

OFFICE OF COMPLIANCE AND INTEGRITY

CAMPUS SECURITY AND FIRE SAFETY REPORT

INCLUDES CRIME AND FIRE STATISTICS FOR MAIN
CAMPUS FOR CALENDAR YEARS 2022, 2023, AND 2024



Wilmington
College

OCTOBER 2025

Overview

As required by The Jeanne Clery Disclosure of Campus Security and Campus Crime Statistics Act, or

“Clery Act,” Wilmington College alerts students, faculty, and staff in a timely manner of crimes that pose a serious or continuing threat to the campus community. Depending upon the nature and location of the incident, Wilmington College may send a campus alert message to members of the community through email or by mobile devices (if they are enrolled in the campus alert system). In addition, any emergency alert that is sent to mobile devices is immediately posted on the College’s website at www.wilmington.edu.

Wilmington College prepares this Annual Security Report in compliance with the Clery Act (as noted above), the Higher Education Opportunity Act, the Campus SaVE Act (which is a reauthorization section included in the Violence Against Women Act). The Higher Education Act (HEA), as amended by the Higher Education Opportunity Act (HEOA). All of these acts specify campus safety requirements for all Title IV institutions. These laws also include the requirements to post missing student notification policies, fire safety practices and data, and information about educational programming that promotes awareness of sexual assault, rape, acquaintance rape, dating violence, domestic violence, and stalking. These disclosures are required in the Annual Security Report and Annual Fire Safety Report due by October 1st each year. Please note that this document is a response to data requested for the 2024 calendar.

year. The statistics are also collected via the Department of Education's web-based Campus Safety and Security site located at <http://ope.ed.gov/security>.

The procedures for preparing the annual disclosure of crime statistics include reporting statistics to the College community obtained from the following sources: the Campus Safety, the local Police Department, and Campus Security Authorities. For statistical purposes, crime statistics reported to any of these sources are recorded in the calendar year the crime was reported. A written request for statistical information is made on an annual basis to all Campus Security Authorities (as defined by federal law).

All of the statistics are gathered, compiled, and reported to the College community via this report, which is published by the Office of Compliance and Integrity. The Office of Compliance and Integrity submits the annual crime statistics published in this brochure to the Department of Education (ED). The statistical information gathered by the Department of Education is available to the public through the ED website.

Campus Security and Safety

The Department of Campus Safety is primarily responsible for the overall security of the campus including students, faculty, staff, buildings, and grounds. The Department of Campus Safety is comprised of a Director, Assistant Director and four campus safety officers. Current certifications in cardiopulmonary resuscitation, obstructed airway skills, standard first aid, external defibrillators, and mental health first aid, is minimally required of all officers. Campus Safety officers are non-sworn and not authorized to make arrests. However, officers are authorized to detain individuals until local law enforcement arrives to make an arrest, if appropriate.

For the protection of the campus community, Wilmington college schedules campus safety officers 24 hours a day and 7 days a week. The Campus Safety Office maintains written records of persons found in academic buildings after scheduled lockup times, as well as reports incidents of violations of the law and College policy and procedures. Campus Safety can be contact at 937.382.0100 or campussafety@wilmington.edu. This contact information is prominently listed on the College website and included on printed department publications and correspondence. Campus Safety officers are always dispatched first to any campus

incident. Depending upon the information gathered at the scene, the campus safety officer may request assistance from the Wilmington City fire, ambulance, and/or police departments. Campus Safety officers will also summons assistance from other local, county, state or federal agencies, if needed.

The Department of Campus Safety cooperates and assists with investigations involving college community members that are brought to its attention by other agencies including for those offenses occurring outside College boundaries.

The College has officially recognized student organizations that own or control housing facilities outside the core main campus. Therefore, Wilmington police department is used to monitor and record criminal activity due to the non-campus location of the student organizations.

Best Practices

- The College provides educational programs that are aimed at preventing domestic violence, dating violence, sexual assault, and stalking. These programs include information about how to respond to these incidents.
- If a student or employee reports that he or she is a victim of domestic violence, dating violence, sexual assault, or stalking – regardless of where the offense occurred – he or she will be provided with a written explanation of his or her rights and options that the College can provide.
- As a matter of policy, the College prohibits retaliation by its officers, employees, or agents against a person who exercises his/her rights or responsibilities under any provision of the Campus SaVe Act.
- When issuing timely warnings as required by the Clery Act, the College withholds the names of victims due to confidentiality.

The College updates and publishes conduct guidelines and procedures annually in the Student Handbook.

Sex Discrimination & Sexual Harassment Policy

Consistent with Wilmington College's testimony, "I will respect the dignity of all persons," Wilmington College (or the "College") is committed to providing a learning, working, and living environment free of discrimination on the basis of sex, including discrimination on the basis of sex and gender by employees, students, or third parties.

Pursuant to Title IX of the Education Amendments of 1972 (Title IX), Wilmington College prohibits discrimination based on sex (including gender identity, gender expression, and sexual orientation) in its educational, extracurricular, athletic, or other programs or activities that it operates, or in the context of admissions or employment. Specifically, Title IX provides, "No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance."

Wilmington College considers sex and gender discrimination in all its forms, including sexual harassment, to be a serious offense. Consistent with Wilmington College's commitment to compliance with Title IX, the College will promptly and equitably respond to all reports and formal complaints under this Sex Discrimination & Sexual Harassment Policy in order to end the conduct, prevent its recurrence and address its effects on individuals and the community.

The policy applies to sexual harassment in the College's education programs or activities – i.e., on campus or at locations or events, or under circumstances over which the College exercises substantial control over both the respondent and the context in which the sexual harassment occurs, and includes any building owned or controlled by a student organization that is officially recognized by the College. It applies to face-to-face encounters, social media, and other forms of electronic communication.

The Policy applies to allegations of sexual harassment made against any person in the United States, including any member of the College community, by a member of the College community in connection with any education program or activity, including any person participating in or attempting to participate in the College's education programs or

activities. Any person may report sex discrimination and sexual harassment in accordance with this Policy (whether the person reporting is the person alleged to be the victim of conduct that could constitute sexual harassment—i.e., the complainant).

Any person participating in or attempting to participate in the College's education programs or activities may file a formal complaint of sexual harassment in accordance with this Policy.

This Policy applies regardless of gender or sexual orientation, as complainants and respondents—i.e., the individual who has been reported to be the perpetrator of conduct that could constitute sexual harassment—may be female, male, non-binary, straight, gay, lesbian, bisexual or transgendered students.¹ For example, both male and female students can be complainants of sexual harassment, and the complainant and respondent can be of the same sex.

Sex Discrimination: Conduct that denies or limits an individual's ability to benefit from or fully participate in educational programs, activities, co-curricular programs including athletics, or employment opportunities because of an individual's sex, gender, gender identity, gender expression or sexual orientation, and discrimination based on an individual's pregnancy.

Sexual Harassment: Sexual harassment is a form of sex discrimination and means conduct on the basis of sex that satisfies one or more of the following:

- a) An employee of the College conditioning the provision of an aid, benefit, or service of the College on an individual's participation in unwelcome sexual conduct—i.e., quid pro quo sexual harassment;
- b) Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the College's education program or activity; or
- c) Sexual assault, dating violence, domestic violence, or stalking

Sexual Conduct: Examples of sexual conduct include, but are not limited to: • Making sexual propositions or pressuring an individual for sexual favors; • Touching of a sexual nature; • Writing graffiti of a sexual nature; • Displaying or distributing sexually explicit drawings, pictures, or written materials; • Performing sexual gestures or touching oneself sexually in front of others; • Telling sexual or dirty jokes; • Spreading sexual rumors or rating other students as to sexual activity or performance; or • Circulating or showing e-mails or websites of a sexual nature.

Unwelcome Conduct vs. Consent: The “conditioning” or “bargain” proposed in quid pro quo harassment may be express or implied from the circumstances. The inquiry into whether sexual conduct is unwelcome does not equate to whether an individual consented to the sexual conduct. When a complainant acquiesces to unwelcome conduct to avoid potential negative consequences, such “consent” does not necessarily mean that the sexual conduct was not “unwelcome” or that quid pro quo harassment did not occur. Whether conduct is considered to be “unwelcome” is a subjective inquiry (i.e., whether the complainant viewed the conduct as unwelcome).

Consent: For purposes of this Policy, consent is defined as the act of knowingly and willingly agreeing verbally or non-verbally to engage in sexual activity. Consent does not exist when if an individual:

- a) Is incapacitated;
- b) Is impaired by any drug or intoxicant;
- c) Has been purposely compelled by force, including threats, intimidation, or coercion;
- d) Is unaware that the act is being committed; e) Is impaired because of a mental or physical condition; or
- f) Pursuant to Ohio law, is under the age of sixteen (16). Consent must exist throughout a sexual encounter and can be withdrawn at any time.

Consent exists when mutually understandable words and/or actions demonstrate a willingness to participate in mutually agreed-upon activity at every stage of that sexual activity. Reasonable reciprocation can be implied. Consent can be withdrawn once given, as long as the withdrawal is clearly

communicated through words or actions. If consent is withdrawn, that sexual activity should cease within a reasonable time.

Since individuals may experience the same interaction in different ways, it is the responsibility of each party to determine that the other has consented before engaging in the activity. If consent is not clearly provided prior to engaging in the activity, consent may be ratified by word or action at some point during the interaction or thereafter, but clear communication from the outset is strongly encouraged.

Consent to some sexual contact (such as kissing or fondling) cannot be presumed to be consent for other sexual activity (such as intercourse). A current or previous intimate relationship is not sufficient to constitute consent.

Proof of consent or non-consent is not a burden placed on either party involved in an incident. Instead, the burden remains on the College to determine whether this Policy has been violated. The existence of consent is based on the totality of the circumstances evaluated from the perspective of a reasonable person in the same or similar circumstances, including the context in which the alleged incident occurred and any similar, previous patterns that may be evidenced.

Incapacitation: A state in which rational or reasonable decision-making and the ability to consent is rendered impossible because of a person's temporary or permanent physical or mental impairment including, but not limited to, physical or mental impairment resulting from drugs or alcohol, disability, sleep, unconsciousness, involuntary physical restraint, or illness.

- a) An incapacitated person cannot give consent.
- b) Sexual activity with someone who one knows or should know to be incapacitated is not consented sexual activity and, therefore, is a violation of this policy.
- c) Incapacitation may result from taking "rape drugs." A rape drug is any drug intentionally used to incapacitate another victim to assist

in the execution of drug facilitated sexual assault. Possession use and/or distribution of any so-called "rape drug" is prohibited and administering these drugs to another person is a violation of this policy.

- d) Being under the influence of alcohol or other drugs will not excuse behavior that violates this policy.

Force: the use of physical violence or physical imposition to gain sexual access, including the use of threat, intimidation (implied threats), or coercion to overcome a person's free will or resistance.

Threat or Intimidation: actual or implied declarations to inflict physical or psychological harm, to cause damage, or to commit other hostile actions to obtain sexual activity from an unwilling participant.

Coercion: unreasonable pressure for sexual activity from an unwilling participant.

Severe, Pervasive, Objectively Offensive: Elements of severity, pervasiveness, and objective offensiveness are evaluated in light of the known circumstances and depend upon the facts of each situation and are determined from the perspective of a reasonable person standing in the shoes of the complainant. Whether conduct is so severe, pervasive, and objectively offensive depends upon the surrounding circumstances, expectations, and relationships, including, but not limited to, the ages, number, disability status, and positions of authority of the individuals involved, among other factors.

Sexual Assault: An offense that meets the definition of rape, fondling, incest, or statutory rape as used in the FBI's Uniform Crime Reporting (UCR) program. Per the National Incident-Based Reporting System User Manual from the FBI UCR Program, a sex offense is "any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent."

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

- Fondling is defined as the touching of the private parts of another person for the purposes of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.
- Incest is defined as sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
- Statutory Rape is defined as sexual intercourse with a person who is under the statutory age of consent.
- Dating Violence is defined under the Violence Against Women Act ("VAWA") as:
 - a) Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim/survivor; and
 - b) Where the existence of such a relationship shall be determined based on consideration of the following factors: i. the length of the relationship; ii. the type of relationship; and iii. the frequency of interaction between the persons involved in the relationship. For the purposes of this definition—
 1. Dating Violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.
 2. Dating violence does not include acts covered under the definition of domestic violence.

Domestic Violence: Domestic violence is defined under VAWA as: a) Felony or misdemeanor crimes of violence committed: i. by a current or former spouse or intimate partner of the victim/survivor; ii. by a person with whom the victim/survivor shares a child in common; iii. by a person who is cohabitating with or has cohabitated with the victim/survivor as a spouse or intimate partner; iv. by a person similarly situated to a spouse of the victim/survivor; v. by any other person against an adult or youth victim/survivor who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

Stalking: defined under VAWA as: a) Engaging in a course of conduct, directed at a specific person that would cause a reasonable person to fear for his or her safety or the safety of others, or to suffer substantial emotional distress.

For the purposes of this definition—

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

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

Guidance on taking immediate action in cases of Sexual Misconduct

Tell a trusted person about the incident. You may contact Wilmington College Campus Security at 937-382-0100 and/or the College's Title IX Coordinator. You may also contact the Wilmington College Counseling Center at 937-481-2272 or 937-481-2509 (x272 or 509) or Health Services at 937-481-2217 (x217). Campus Safety and the Title IX Coordinator can provide immediate referral information, access to the College counselor on call, and/or investigation assistance.

In the event that a sex offense (including sexual assault or stalking) has occurred, do everything possible to preserve evidence by making certain that the crime scene is not disturbed. (The decision to press charges does not have to be made at this time. However, following these procedures will help preserve this option for the future and will help in obtaining a protective order, if necessary.) Survivors should not bathe, urinate, douche, brush teeth, or drink liquids. Clothes should not be changed; all the original clothing should be taken to the hospital in a paper bag. (Plastic bags damage evidence.)

When necessary, seek immediate medical attention at an area hospital and take a full change of clothing, including shoes, for use after a medical examination.

In addition to the above College resources, there are also independent resources available to victims of sexual assault. The Alternatives to Violence Center serves any person who is a survivor of sexual assault, including providing court advocacy, counseling, support groups, temporary shelter, education, and a 24-hour crisis line. The Center is located at 32 East Sugartree Street, Wilmington, OH 45177. The telephone number for the Center is (937) 383-3285 and the crisis line number is (888) 816-1146.

Though the College will undertake its own investigation of any report of sexual misconduct, you may also: (1) notify proper law enforcement authorities, including the Wilmington Police

Department; (2) Be assisted by campus authorities in notifying law enforcement; or (3) Decline to notify such authorities.

Title IX Coordinator:

The Title IX Coordinator is the designated agent of the College with primary responsibility for receiving reports and formal complaints of sexual harassment, signing formal complaints, and generally coordinating the College's compliance with Title IX. The Title IX Coordinator's responsibilities include overseeing the College's response to reports and formal complaints of sexual harassment, including supportive measures, as well as overseeing the College's documentation and recordkeeping set forth in Section 7.0. The Title IX coordinator provides educational materials and training on Title IX, and generally provides guidance and ensures a fair process for individuals involved in Title IX complaints. Below is the contact information for the Title IX Coordinator(s) during the 2024 calendar year:

Nathan Flack, Academic Resource Center Manager and Title IX Coordinator,
1870 Quaker Way Pyle Center Box 1253, Wilmington, Ohio 45177 Tel: (937)
481-2208 (Ext. 208) E-mail: nathan.flack@wilmington.edu

If the Title IX Coordinator had a conflict of interest in handling or was otherwise unable to handle the Title IX matter at issue, the Assistant Director of the Annual Fund would act as the Alternate Title IX Coordinator for that matter.

Below was the contact information for the Alternate Title IX Coordinator:

Britany Chrisman, Assistant Director of the Annual Fund, 1870 Quaker Way,
Pyle Center Box 1307 Wilmington, Ohio 45177 Tel: (937) 481-2401 (Ext.
401) E-mail: brittany.v.chrisman@wilmington.edu

Confidential Resources

Professional Counselor: A professional counselor is an individual employed or contacted by the College who is responsible for providing mental health counseling to members of the College's community and acting within the scope of his or her license or certification. This includes professional counselors at the Wilmington College Health and Wellness Center, which can be reached at 937-481-2272 (x272).

Pastoral Counselor: A pastoral counselor is an individual associated with a religious order or denomination and recognized as someone who provides confidential counseling by such religious order or denomination. This person must function within the scope of that recognition to keep confidentiality and can be reached at 937-481-2239 (x239).

Survivor Advocate: A survivor advocate is an individual employed or contracted with the College's Victim Services, S.A.F.E, including those individuals employed or contracted with the College through the Office on Violence Against Women (OVW) grant program.

Doctor/Nurse: A doctor or nurse is an individual employed or contracted by the College who is responsible for providing medical health services to members of the College's community and acting within the scope of his or her license or certification. This includes doctors and nurses at the Wilmington College Health Center, which can be reached at 937-481-2217 (x217).

Prevention Programs and Institutional Disciplinary Procedures Addressing Dating Violence, Domestic Violence, Sexual Assault, or Stalking

Wilmington College prohibits the offenses of domestic violence, dating violence, stalking, and sexual assault as, defined by the Clery Act, and reaffirms its commitment to maintaining a campus environment that emphasizes the dignity and worth of all members of the College Community. Toward that end, Wilmington College issues this statement of policy to inform the campus community of our programs to address domestic violence, dating violence, stalking, and sexual assault as well as the procedures for institutional disciplinary action in cases of alleged

dating violence, domestic violence, sexual assault, or stalking, which will be followed regardless.

Federal Clery Act Definitions of Domestic Violence, Dating Violence, Sexual Assault and Stalking

The Clery Act defines the crimes of domestic violence, dating violence, sexual assault and stalking as follows:

Domestic Violence

A Felony or misdemeanor crime of violence committed:

- a. By a current or former spouse or intimate partner of the victim;
- b. By a person with whom the victim shares a child in common;
- c. By a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner;
- d. By a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; or
- e. By any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

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

Dating Violence: Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. For the purposes of this definition—Dating Violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. Dating violence does not include acts covered under the definition of domestic violence. For the purposes of complying with the requirements of this section and §668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

Sexual Assault An offense that meets the definition of rape, fondling, incest, or statutory rape as used in the FBI's Uniform Crime Reporting (UCR) program. Per the National Incident-Based Reporting System User Manual from the FBI UCR Program, a sex offense is "any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent."

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

Fondling is defined as the touching of the private parts of another person for the purposes of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.

Incest is defined as sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

Statutory Rape is defined as sexual intercourse with a person who is under the statutory age of consent.

Stalking:

- i. Engaging in a course of conduct directed at a specific person that would cause a reasonable person to—
 - a) Fear for the person's safety or the safety of others; or
 - b) Suffer substantial emotional distress.
- ii. For the purposes of this definition—
 - c) *Course of conduct* means two or more acts, including, but not limited to, acts which the stalker directly, indirectly, or through third parties, by any action, method, device, or means follows, monitors, observes, surveils, threatens, or communicates to or about, a person, or interferes with a person's property.
 - d) *Reasonable person* means a reasonable person under similar circumstances and with similar identities to the victim.

- e) *Substantial emotional distress* means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.
- iii. For the purposes of complying with the requirements of this section and section 668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

Jurisdictional Definitions of Stalking, Sexual Assault, Domestic Violence, and Dating Violence

The Ohio Revised Code provides definitions of sexual offenses that differ somewhat from those of the FBI. When a sex offense occurs and the perpetrator is referred to criminal court, they are normally charged under the provisions of the ORC. The applicable codes are listed here:

2903.211 Menacing by stalking

(A)(1) No person by engaging in a pattern of conduct shall knowingly cause another person to believe that the offender will cause physical harm to the other person or a family or household member of the other person or cause mental distress to the other person or a family or household member of the other person. In addition to any other basis for the other person's belief that the offender will cause physical harm to the other person or the other person's family or household member or the other person's mental distress or the other person's family or household member, the other person's belief or mental distress may be based on words or conduct of the offender that are directed at or identify a corporation, association, or other organization that employs the other person or to which the other person belongs.

(2) No person, through the use of any form of written communication or electronic method of remotely transferring information, including, but not limited to, any computer, computer network, computer program, r-computer system or telecommunication device shall post a message or use any intentionally written or verbal graphic gesture with purpose to urge or entice another to commit a violation of this section.

No person, with a sexual motivation, shall violate this section.

2907.02 Rape

No person shall engage in sexual conduct with another who is not the spouse of the offender or who is the spouse of the offender but is living separate and apart from the offender, when any of the following applies:

For the purpose of preventing resistance, the offender substantially impairs the other person's judgment or control by administering any drug, intoxicant, or controlled substance to the other person surreptitiously or by force, threat of force, or deception.

The other person is less than thirteen years of age, whether or not the offender knows the age of the other person.

The other person's ability to resist or consent is substantially impaired because of a mental or physical condition or because of advanced age, and the offender knows or has reasonable cause to believe that the other person's ability to resist or consent is substantially impaired because of a mental or physical condition or because of advanced age.

No person shall engage in sexual conduct with another when the offender purposely compels the other person to submit by force or threat of force.

A victim need not prove physical resistance to the offender in prosecutions under this section.

2907.03 Sexual Battery

No person shall engage in sexual conduct with another, not the spouse of the offender, when any of the following apply:

The offender knowingly coerces the other person to submit by any means that would prevent resistance by a person of ordinary resolution.

The offender knows that the other person's ability to appraise the nature of or control the other person's own conduct is substantially impaired.

The offender knows that the other person submits because the other person is unaware that the act is being committed.

The offender knows that the other person submits because the other person mistakenly identifies the offender as the other person's spouse.

The offender is the other person's natural or adoptive parent, or a stepparent, or guardian, custodian, or person in loco parentis of the other person.

The other person is in custody of law or a patient in a hospital or other institution, and the offender has supervisory or disciplinary authority over the other person.

The offender is a teacher, administrator, coach, or other person in authority employed by or serving in a school for which the state board of education prescribes minimum standards pursuant to division (DO) of section 3301.07 of the Revised Code, the other person is enrolled in or attends that school, and the offender is not enrolled in an does not attend that school.

The other person is a minor, the offender is a teacher, administrator, coach, or other person authority employed by or serving in an institution of higher education, and the other person is enrolled in or attends that institution.

The other person is a minor, and the offender is the other person's athletic or other type of coach is the other person's instructor, is the leader of a scouting troop of which the other person is a member, or is a person with themporary or occasional disciplinary control over the other person.

The offender is a mental health professional, the other person is a mental health client or patient of the offender, and the offender induces the other person to submit by falsely representing to the other person that the sexual conduct is necessary for mental health treatment purposes.

The other person is confined in a detention facility, and the offender is an employee of that detention facility.

The other person is a minor, the offender is a cleric, and the other person is a member of, or attends, the church or congregation served by the cleric.

The other person is a minor, the offender is a peace officer, and the offender is more than two years older than the other person.

2907.04 Unlawful sexual conduct with a minor

No person who is eighteen years of age or older shall engage in sexual conduct with another, who is not the spouse of the offender, when the offender knows the other person is thirteen years of age or older, but less than sixteen years of age, or the offender is reckless in that regard.

2907.05 Gross sexual imposition

No person shall have sexual contact with another, not the spouse of the offender; cause another, not the spouse of the offender, to have sexual contact with the offender; or cause two or more other persons to have sexual contact when any of the following applies:

The offender purposely compels the other person, or one of the other persons, to submit by force or threat of force.

For the purpose of preventing resistance, the offender substantially impairs the judgment or control of the other person or of one of the other persons by administering any drug, intoxicant, or controlled substance to the other person surreptitiously or by force, threat of force, or deception.

The offender knows that the judgment or control of the other person or of one of the other persons is substantially impaired as a result of the influence of any drug or intoxicant administered to the other person with the other person's consent for the purpose of any kind of medical or dental examination, treatment or surgery.

The other person, or one of the other persons, is less than thirteen years of age, whether or not the offender knows the age of that person.

The ability of the other person to resist or consent or the ability of one of the other persons to resist or consent is substantially impaired because of a mental or physical condition or because of advanced age, and the offender knows or has reasonable cause to believe that the ability to resist or consent of the other person or of one of the other persons is substantially impaired because of a mental or physical condition or because of advanced age.

No person shall knowingly touch the genitalia of another, when the touching is not through clothing, the other person is less than twelve years of age, whether or not the offender knows the age of that person, and the touching is done with an intent to abuse, humiliate, harass, degrade, or arouse or gratify the sexual desire of any person.

2907.06 Sexual Imposition

No person shall have sexual contact with another, not the spouse of the offender, to have sexual contact with the offender; or cause two or more other persons to have sexual contact when any of the following applies:

The offender knows that the sexual contact is offensive to the other person, or one of the other persons, or is reckless in that regard.

The offender knows that the other persons, or one of the other person's, ability to appraise the nature of or control the offender's or touching person's conduct is substantially impaired.

The offender knows that the other person, or one of the other persons, submits because of being unaware of the sexual contact.

The other person, or one of the other persons, is thirteen years of age or older but less than sixteen years of age, whether or not the offender knows the age of such person, and the offender is at least eighteen years of age and four or more years older than such other person.

The offender is a mental health professional, the other person or one of the other persons is a mental health client or patient of the offender, and the offender induces the other person who is the client or patient to submit by falsely representing to the other person who is the client or patient that the sexual contact is necessary for mental health treatment purposes.

The College also prohibits domestic violence. For the purposes of complying with the Violence Against Women Act (VAWA), any incident meeting the following definition is considered a crime for the purposes of the Clery Act:

2919.25 Domestic Violence

No person shall knowingly cause or attempt to cause physical harm to a family or household member. No person shall recklessly cause serious physical harm to a family or household member. No person, by threat of force, shall knowingly cause a family or household member to believe that the offender will cause imminent physical harm to the family or household member.

In addition to prohibiting domestic violence, the College prohibits dating violence. For the purposes of complying with the requirements of the VAWA, an incident meeting the following definition is considered a crime for the purposes of Clery Act reporting.

Dating Violence: means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.

For the purposes of this definition:

Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. Dating violence does not include acts covered under the definition of domestic violence.

Under the ORC, dating violence is not specifically addressed in the criminal code. On July 6, 2018, however, Ohio expanded certain resources to cover those in dating relationships experiencing domestic violence as defined under ORC 3113.31. Specifically, those experiencing domestic violence in dating relationships can seek and be issued domestic violence civil protection orders and have access to domestic violence shelters (ORC 3113.33).

The College prohibits stalking. For the purposes of complying with the requirements of the VAWA, any incident meeting the following definition is considered a crime for the purposes of Clery Act reporting:

Education and Prevention Programming

Bystanders play a critical role in the prevention of sexual and relationship violence. They are “individuals who observe violence or witness the conditions that perpetuate violence. They are not directly involved but have the choice to intervene, speak up, or do something about it.”¹ We want to promote a culture of community accountability where bystanders are actively engaged in the prevention of violence without causing further harm. We may not always know what to do even if we want to help. Below is a list² of some ways to be an active bystander. Further information regarding bystander intervention may be found. If you or someone else is in immediate danger, dial 911. This could be when a person is yelling at or being physically abusive towards another and it is not safe for you to interrupt.

1. Watch out for your friends and fellow students/employees. If you see someone who looks like they could be in trouble or need help, ask if they are ok.
2. Confront people who seclude, hit on, try to make out with, or have sex with people who are incapacitated.
3. Speak up when someone discusses plans to take sexual advantage of another person.
4. Believe someone who discloses sexual assault, abusive behavior, or experience with stalking.
5. Refer people to on or off campus resources listed in this document for support in health, counseling, or with legal assistance.

Risk Reduction

With no intent to victim blame and recognizing that only abusers are responsible for their abuse, the following are some strategies to reduce one’s risk of sexual assault or harassment (taken from Rape, Abuse, & Incest National Network, www.rainn.org)

¹ Burn, S.M. (2009). A situational model of sexual assault prevention through bystander intervention. *Sex Roles*, 60, 779-792.

² Bystander intervention strategies adapted from Stanford College’s Office of Sexual Assault & Relationship Abuse

Programs to Prevent Domestic Violence, Dating Violence, Sexual Assault and Stalking

The College engages in comprehensive, intentional, and integrated programming, initiatives, strategies, and campaigns intended to end dating violence, domestic violence, sexual assault and stalking that:

- A. Are culturally relevant, inclusive of diverse communities and identities, sustainable, responsive to community needs, and informed by research, or assessed for value, effectiveness, or outcome; and
- B. Consider environmental risk and protective factors as they occur on the individual, relationship, institutional, community and societal levels.

Educational programming consists of primary prevention and awareness programs for all incoming students and new employees and ongoing awareness and prevention campaigns for students and that:

- A. A statement that the institution prohibits the crimes of domestic violence, dating violence, sexual assault, and stalking (as defined by the Clery Act);
- B. The definitions of domestic violence, dating violence, sexual assault and stalking according to any applicable jurisdictional definitions of these terms;
- C. What behavior and actions constitute consent, in reference to sexual activity, in the State of Ohio;
- D. The institution's definition of consent AND the purposes for which that definition is used.
- E. A description of safe and positive options for bystander intervention. Bystander intervention means safe and positive options that may be carried out by an individual or individuals to prevent harm or intervene when there is a risk of dating violence, domestic violence, sexual assault or stalking. Bystander intervention includes recognizing situations of potential harm, understanding institutional structures and cultural conditions that facilitate violence, overcoming barriers to intervening, identifying safe and effective intervention options, and taking action to intervene;
- F. Information on risk reduction. Risk reduction means options designed to decrease perpetration and bystander inaction, and to increase empowerment for victims in order to promote safety and to help individuals and communities address conditions that facilitate violence.

G. Information regarding:

- a. procedures victims should follow if a crime of domestic violence, dating violence, sexual assault and stalking occurs (as described in "Procedures Victims Should Follow if a Crime of Domestic Violence, Dating Violence, Sexual Assault and Stalking Occurs" elsewhere in this document)
- b. how the institution will protect the confidentiality of victims and other necessary parties (as described in "Assistance for Victims: Rights and Options" elsewhere in this document);
- c. existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available for victims, both within the institution and in the community (as described in "Assistance for Victims: Rights and Options" elsewhere in this document); and
- d. options for, available assistance in, and how to request changes to academic, living, transportation, and working situations or protective measures (as described in "Assistance for Victims: Rights and Options" elsewhere in this document);
- e. procedures for institutional disciplinary action in cases of alleged dating violence, domestic violence, sexual assault, or stalking (as described in "Adjudication of Violations" elsewhere in this document);

Primary Prevention and Awareness Programs

Wilmington College provides comprehensive primary prevention education programs that aim to prevent domestic violence, dating, violence, sexual assault, and stalking.

Educational programing consists of primary prevention and awareness programs for all incoming students and new employees and ongoing awareness and prevention campaigns for students and employees that:

- Identifies domestic violence, dating violence, sexual assault and stalking as prohibited conduct;
- Defines, using definitions provided both by the U.S. Department of Education, as well as state law, what behavior constitutes domestic violence, dating violence, sexual assault, and stalking;

- Defines what behavior and actions constitute consent to sexual activity in the state of Ohio and using the definition of consent found in the Student Handbook where state law differs from the definitions used on campus to address College policy violations;
- Provides a description of safe and positive options for bystander intervention. Bystander intervention means safe and positive options that may be carried out by an individual or individuals to prevent harm or intervene when there is a risk of dating violence, domestic violence, sexual assault, or stalking. Bystander intervention includes recognizing situations of potential harm, understanding institutional structures and cultural conditions that facilitate violence, overcoming barriers to intervening, identifying safe and effective intervention options, and taking action to intervene;
- Information on risk reduction. Risk reduction means options designed to decrease perpetration and bystander inaction, and to increase empowerment for victims in order to promote safety and to help individuals and communities address conditions that facilitate violence;
- Provides an overview of information contained in the annual security report in compliance with the Clery Act. Information regarding:
 - procedures victims should follow if a crime of domestic violence, dating violence, sexual assault and stalking occurs;
 - how the institution will protect the confidentiality of victims and other necessary parties;
 - options for, available assistance in, and how to request changes to academic, living, transportation, and working situations or supportive measures;
 - procedures for institutional disciplinary action in cases of alleged dating violence, domestic violence, sexual assault, or stalking.

Wilmington College has developed an annual educational campaign consisting of presentations that include distribution of educational materials to new students and participating in and presenting information to new.

Specifically, the College offered the following **primary prevention and awareness programs** for all **incoming students** in 2024:

Name of Program	Date	Location	Which Prohibited Behavior* Covered?

Bringing in the Bystander – New Student Orientation	08/2024	Hugh Highland Theatre	DoV, DaV, SA, S
Athletics Title IX Training	08/2024	Hermann Court	DoV, DaV, SA, S
New Member Education – Office of Fraternity and Sorority Life	09/2024	McCoy Room	DoV, DaV, SA, S
Situational Awareness Program	10/2024	Hugh Highland Theater	DoV, DaV, SA, S

*DoV means Domestic Violence, DaV means Dating Violence, SA means Sexual Assault and S means Stalking

The College offered the following **primary prevention and awareness programs** for all **new employees** in 2024:

Name of Program	Date Held	Location Held	Which Prohibited Behavior* Covered?
Sex Discrimination & Sexual Harassment Training	10/2024		DoV, DaV, SA, S

*DoV means Domestic Violence, DaV means Dating Violence, SA means Sexual Assault and S means Stalking

Ongoing Prevention and Awareness Campaigns

The College has developed an annual educational campaign consisting of programs, initiatives, and strategies to demonstrating ongoing prevention and awareness programs to all students and employees. These initiatives and strategies are sustained over time such as face-to-face presentations and printed materials.

The College offered the following **ongoing awareness and prevention programs** for **students** in 2024:

Name of Program	Date Held	Location Held	Which Prohibited Behavior* Covered?
Student Title IX Training	1/2024	Hugh Highland Theatre	DoV, DaV, SA, S

*DoV means Domestic Violence, DaV means Dating Violence, SA means Sexual Assault and S means Stalking

The College offered the following **ongoing awareness and prevention programs** for **employees** in 2024:

Name of Program	Date Held	Location Held	Which Prohibited Behavior* Covered?
Sex Discrimination & Sexual Harassment Training	10/2024		DoV, DaV, SA, S

*DoV means Domestic Violence, DaV means Dating Violence, SA means Sexual Assault and S means Stalking

Procedures Victims Should Follow if a Crime of Domestic Violence, Dating Violence, Sexual Assault and Stalking Occurs

After an incident of sexual assault, dating violence or domestic violence, the victim should consider seeking medical attention as soon as possible at Clinton Memorial Hospital. In Ohio, evidence may be collected even if you chose not to make a report to law enforcement³ It is important that a victim of sexual assault not bathe, douche, smoke, change clothing or clean the bed/linen/area where they were assaulted if the offense occurred within the past 96 hours so that evidence may be preserved that may assist in proving that the alleged criminal offense occurred/or is occurring or may be helpful in obtaining a protection order. In circumstances of sexual assault, if victims do not opt for forensic evidence collection, health care providers can still treat injuries and take steps to address concerns of pregnancy and/or sexually transmitted infections. Victims of sexual assault, domestic violence, stalking, and dating violence are encouraged to also preserve evidence by saving text messages, instant messages, social networking pages, other communications, and keeping pictures, logs or other copies of documents, if they have any, that would be useful to College adjudicators/investigators or police.

As time passes, evidence may dissipate or become lost or unavailable, thereby making investigation, possible prosecution, disciplinary proceedings, or obtaining protection from abuse orders related to the incident more difficult. If a victim

³ Under the Violence Against Women and Department of Justice Reauthorization Act of 2005, starting in 2009, states must certify that they do not “require a victim of sexual assault to participate in the criminal justice system or cooperate with law enforcement in order to be provided with a forensic medical exam, reimbursement for charges incurred on account of such an exam, or both.”

chooses not to make a complaint regarding an incident, he or she nevertheless should consider speaking with Campus Public Safety or other law enforcement to preserve evidence in the event that the victim decides to report the incident to law enforcement or the College at a later date to assist in proving that the alleged criminal offense occurred or that may be helpful in obtaining a protection order.

Involvement of Law Enforcement and Campus Authorities

Although the College strongly encourages all members of its community to report violations of this policy to law enforcement (including on campus law enforcement and/or local police), it is the victim's choice whether or not to make such a report. Furthermore, victims have the right to decline to notify law enforcement. However, the College's Campus Safety will assist any victim with notifying law enforcement if the victim so desires. The Wilmington Police Department may also be reached directly by calling 937-382-3833 , or in person at 69 N. South Street. Additional information about the Wilmington Police department may be found online at: <https://wilmingtonohio.gov/departments/police>. Reports can be filed online or in person.

Reporting Incidents of Domestic Violence, Dating Violence, Sexual Assault and Stalking

If you have been the victim of domestic violence, dating violence, sexual assault, or stalking, you should report the incident promptly to the Title IX Coordinator, Spencer K. Izor, Associate Vice President – Compliance by calling 937-481-2365, writing spencer.izor@wilmington.edu or coming into the office to report in person and Campus Public Safety (if the victim so desires.) Reports of all domestic violence, dating violence, sexual assault and stalking made to Campus Public Safety will automatically be referred to the Title IX Coordinator for investigation regardless of if the complainant chooses to pursue criminal charges.

Procedures the College Will Follow When a Crime of Domestic Violence, Dating Violence, Sexual Assault and Stalking is Reported

The College has procedures in place that serve to be sensitive to victims who report sexual assault, domestic violence, dating violence, and stalking, including informing individuals about their right to file criminal charges as well as the availability of counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid and other services on and/or off campus as well as additional remedies to prevent contact between a complainant

and an accused party, such as changes to housing, academic, protective orders, transportation and working situations, if reasonably available. The College will make such accommodations or protective measures, if the victim requests them and if they are reasonable available, regardless of whether the victim chooses to report the crime to the Campus Safety or local law enforcement. Students and employees should contact Spencer K. Izor, Associate Vice President – Compliance at 937-481-2365 or spencer.izor@wilmington.edu.

If a report of domestic violence, dating violence, sexual assault or stalking is reported to the College, below are the procedures that the College will follow:

Incident Being Reported	Procedure Institution Will Follow
Sexual Assault	1. Depending on when reported (immediate vs delayed report), institution will provide complainant with access to medical care. 2. Institution will assess immediate safety needs of complainant. 3. Institution will assist complainant with contacting local police if complainant requests AND provide the complainant with contact information for local police department. 4. Institution will provide complainant with referrals to on and off campus mental health providers. 5. Institution will assess need to implement interim or long-term protective measures, if appropriate. 6. Institution will provide the victim with a written explanation of the victim's rights and options. 7. Institution will provide a "No trespass" (PNG) directive to accused party if deemed appropriate. 8. Institution will provide written instructions on how to apply for Protective Order 9. Institution will provide a copy of the policy applicable to Sexual Assault to the complainant and inform the complainant regarding timeframes for inquiry, investigation, and resolution.

	10. Institution will inform the complainant of the outcome of the investigation, whether or not the accused will be administratively charged and what the outcome of the hearing is. 11. Institution will enforce the anti-retaliation policy and take immediate and separate action against parties that retaliate against a person for complaining of sex-based discrimination or for assisting in the investigation. 12. Institution official receiving the report will forward the report to the Title IX Coordinator in accordance with the institution's policy and procedure
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Stalking	1. Institution will assess immediate safety needs of complainant. 2. Institution will assist complainant with contacting local police if complainant requests AND provide the complainant with contact information for local police department. 3. Institution will provide written instructions on how to apply for Protective Order 4. Institution will provide written information to complainant on how to preserve evidence. 5. Institution will assess need to implement interim or long-term protective measures to protect the complainant, if appropriate 6. Institution will provide the victim with a written explanation of the victim's rights and options. 7. Institution will provide a "No trespass" (PNG) directive to accused party if deemed appropriate. 8. Institution official receiving the report will forward the report to the Title IX Coordinator in accordance with the institution's policy and procedure
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Dating Violence	1. Institution will assess immediate safety needs of complainant. 2. Institution will assist complainant with contacting local police if complainant requests AND provide the complainant with contact information for local police department. 3. Institution will provide written instructions on how to apply for Protective Order 4. Institution will provide written information to complainant on how to preserve evidence. 5. Institution will assess need to implement interim or long-term protective measures to protect the complainant, if appropriate 6. Institution will provide the victim with a written explanation of the victim's rights and options. 7. Institution will provide a "No trespass" (PNG) directive to accused party if deemed appropriate. 8. Institution official receiving the report will forward the report to the Title IX Coordinator in accordance with the institution's policy and procedure.
Domestic Violence	1. Institution will assess immediate safety needs of complainant. 2. Institution will assist complainant with contacting local police if complainant requests AND complainant provided with contact information for local police department. 3. Institution will provide written instructions on how to apply for Protective Order 4. Institution will provide written information to complainant on how to preserve evidence. 5. Institution will assess need to implement interim or long-term protective measures to protect the complainant, if appropriate 6. Institution will provide the victim with a written explanation of the victim's rights and options. 7. Institution will provide a "No trespass" (PNG) directive to accused party if deemed appropriate. 8. Institution official receiving the report will forward the report to the Title IX Coordinator in accordance with the institution's policy and procedure

Assistance for Victims: Rights & Options

Regardless of whether a victim elects to pursue a criminal complaint or whether the offense is alleged to have occurred on or off campus, the College will assist victims of sexual assault, domestic violence, dating violence, and stalking and will provide each victim with a written explanation of their rights and options. Such written information will include:

- the procedures victims should follow if a crime of dating violence, domestic violence, sexual assault, or stalking has occurred;
- information about how the institution will protect the confidentiality of victims and other necessary parties;
- a statement that the institution will provide written notification to students and employees about victim services within the institution and in the community;
- a statement regarding the institution's provisions about options for, available assistance in, and how to request accommodations and protective measures; and an explanation of the procedures for institutional disciplinary action.

Rights of Victims and the Institution's Responsibilities for Orders of Protection, "No Contact" Orders, Restraining Orders, or Similar Lawful Orders Issued by a Criminal, Civil, or Tribal Court or by the Institution

Wilmington College complies with Ohio law in recognizing orders of protection. Any person who obtains an order of protection from Ohio should provide a copy to Campus Police and the Office of the Title IX Coordinator. A complainant may then meet with Campus Police to develop a Safety Action Plan, which is a plan for campus police and the victim to reduce risk of harm while on campus or coming and going from campus. This plan may include, but is not limited to escorts, special parking arrangements, providing a temporary cellphone, changing classroom location, or allowing a student to complete assignments from home, etc.) The College cannot apply for a legal order of protection, no contact order or restraining order for a victim from the applicable jurisdiction(s).

Type Of Order	Rights of Victims	Institution's Responsibilities
Orders of protection	Orders of, may be sought via the court system with jurisdiction over where the victim resides.	The victim may present an order of protection issued by a court to the College's Department of

		Campus Safety so that the department has it on file. This information may also be presented to the Office of Compliance and Integrity to assist in determining a safety plan and accommodations.
No contact orders	A victim may seek an institutional No Contact Order from the College	The College may issue an institutional No Contact order if deemed appropriate and/or at the request of the victim or accused.
Restraining orders	See "Orders of Protection" above	See "Orders of Protection" above
Similar lawful orders issued by a criminal, civil, or tribal court. Orders by the institution (PNG)	Victims have the right to have any lawful orders recognized by the institution. Institutional orders will be issued as deemed appropriate.	Any lawful orders obtained by a victim should be presented to Campus Safety and the Office of Compliance and Integrity.

The victim is required to apply directly for these services or can seek advice through the Office of Compliance and Integrity. Protection from abuse orders may be available through the Clinton County Court of Common Pleas. For assistance in completing the Petition, the victim, may contact the local victim assistance program, domestic violence program, or Ohio Domestic Violence Network at 800-934-9840.

**CHART DEMONSTRATING TYPES OF ORDERS AVAILABLE
IN
CLINTON COUNTY, OHIO**

Type of Order:	Who Can File for One:	Court:	Based On:
Civil Stalking or Sexually Oriented Offense Protection Order (CPO) – up to 5 years, can be renewed**	Any person 18 years of age or older who lives in Clinton County may seek a CPO on behalf of themselves or any family or household members including : • Spouses, former spouses • Parent, child, foster parent • People who have kids together • Intimate partners who lived together in the last 5 years; Any person who was a victim of a sexually oriented offense (see ORC 2950.01). No relationship with offender is required. Case does not have to be criminally prosecuted. –OR– Any person who is a victim of stalking. No relationship with stalker is required.	Common Pleas Court – where victim lives, where abuser lives or has a business, or where incident(s) occurred	Causing or trying to cause injury or placing someone in fear of imminent serious harm Sexual assault or unwanted sexual contact (see ORC 2950.01)
Dating Violence or Domestic Violence Protection Order	Any person 18 years of age and older who is a resident of Clinton County, against a family or household member or a person with whom Petitioner as a dating relationship	Common Pleas Court - where victim lives, where abuser lives or has a business, or where incident(s) occurred	Dating relationship within the preceding 12 months, reckless bodily injury, placing another in fear by threat of force or imminent serious physical harm menacing by stalking or aggravated trespass
Juvenile Protection Order – until abuser reaches age 19	Victim of abuse by a person who is under age 18, or the victim’s parent or other household member, or other parties the Court approves.	Juvenile Court – where victim lives	Assault, stalking, sexual offenses, threats of harm or aggravated trespass

The College may issue an institutional no contact order if deemed appropriate or at the request of the victim or accused. If the College receives a report that such an institutional no contact order has been violated, the College will initiate disciplinary proceedings appropriate to the status of the accused (student, employee, etc.) and will impose sanctions if the accused is found responsible for violating the no contact order.

Accommodations and Protective Measures Available for Victims

Upon receipt of a report of domestic violence, dating violence, sexual assault or stalking, Wilmington College will provide written notification to students and employees about accommodations available to them, including academic, living, transportation, protective orders and working situations. The written notification will include information regarding the accommodation options, available assistance in requesting accommodations, and how to request accommodations and protective measures (i.e., the notification will include the name and contact information for the individual or office that should be contacted to request the accommodations).

At the victim's request, and to the extent of the victim's cooperation and consent, College offices will work cooperatively to assist the victim in obtaining accommodations. If reasonably available, a victim may be offered changes to academic, living, working, protective measures or transportation situations regardless of whether the victim chooses to report the crime to campus police or local law enforcement. Examples of options for a potential change to the academic situation may be to transfer to a different section of a class, withdraw and take a class at another time if there is no option for moving to a different section, etc. Potential changes to living situations may include moving to a different room or residence hall. Possible changes to work situations may include changing working hours. Possible changes in transportation may include having the student or employee park in a different location, assisting the student or employee with a safety escort, etc.

To request changes to academic, living, transportation and/or working situations or protective measures, a victim should request these services by contacting Spencer Izor, Associate Vice President – Compliance at 937-381-2365 or spencer.izor@wilmington.edu.

On and Off Campus Services for Victims

Upon receipt of a report of domestic violence, dating violence, sexual assault or stalking, Wilmington College will provide written notification to students and employees about existing assistance with and/or information about obtaining resources and services including counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid and assistance in notifying appropriate local law enforcement. These resources include the following:

ON CAMPUS	Type of Services Available	Service Provider	Contact Information
Campus Ministry	Confidential Pastoral Care and Support	Ordained Campus Minister	Campus Ministry 937.481.2237
Counseling Center	Individual counseling; seminars and group therapy; on-call crisis intervention for Wilmington College students	Licensed Counseling professionals	Health and Wellness Center 937-481-2272
Health Services	Confidential medical services and healthcare education	Board- certified physicians and nurses	Health and Wellness Center 937-481-2272
International Student Services	Services, resources and programs to assist international students when dealing with special circumstances.	Director for International Affairs	Heiland House
Office of Compliance and Integrity	Provides supportive measures to Complainants and respondents; handles complaints related to protected class discrimination and sexual misconduct	Associate Vice President of Compliance	College Hall 937-481-2365
Student Financial Aid	Guidance to current undergraduate and graduate students to navigate special circumstances related to financial aid	Senior Director, Student One Stop Center/Financial Aid	Pyle Student Center 937-481-2337

OFF CAMPUS	Type of Services Available	Service Provider	Contact Information
Wilmington Police Department	Municipal law enforcement, investigations and guidance on seeking criminal charges	OPOTA certified and sworn officers/investigators	69 N South Street, Wilmington, OH 45177 937-382-3833
Clinton County Prosecutor's Office – Victim Witness Division	Provides crime victims and witnesses with case status notification, referrals and assistance with restitution, victims' compensation and forms	Licensed attorneys and trained staff members	
Highland County/Clinton County Alternatives to Violence Center	Offers services: Shelter, 24-hour crisis line, support groups, counseling, limited transportation, Hope-Line Cell Phone, parenting, emergency legal advice, court/family advocacy, sexual assault advocacy, offender's programs, adult anger management, teen programs	Victim Advocates	37 West Main Street Wilmington, OH 45177 866-296-5415
Clinton Memorial Hospital	Emergency medical care, Sexual Assault Nurse Examiner (SANE)	Board Certified physician, nurses, and other health care professionals	610 W. Main St. Wilmington, OH 45177 937-
YWCA House of Peace	Offers emergency shelter, 24-hour crisis line, court advocacy, support groups, safety planning, protection order assistance, case management, pet protection, child safety	Victim Advocates	513-753-7281
Family Violence Prevention Center of Greene County	Provides crisis intervention, and safe housing	Victim Advocates	Xenia, Ohio 937-376-8526

Other resources available to persons who report being the victim of sexual assault, domestic violence, dating violence, or stalking, include:

- <http://www.rainn.org> – Rape, Abuse and Incest National Network
- <http://www.ovw.usdoj.gov/sexassault.htm> – Department of Justice
- <http://www2.ed.gov/about/offices/list/ocr/index.html> – Department of Education, Office for Civil Rights

Confidentiality

Victims may request that directory information on file with the College be withheld by request by contacting Spencer Izor, Associate Vice President – Compliance at 937-381-2365 or spencer.izor@wilmington.edu.

Regardless of whether a victim has opted-out of allowing the College to share “directory information,” personally identifiable information about the victim and other necessary parties will be treated as confidential and only shared with persons who have a specific need-to-know, i.e., those who are investigating/adjudicating the report or those involved in providing support services to the victim, including accommodations and protective measures. By only sharing personally identifiable information with individuals on a need-to-know basis, the institution will maintain as confidential, any accommodations or protective measures provided to the victim to the extent that maintaining such confidentiality would not impair the ability of the institution to provide the accommodations or protective measures.

The College does not publish the name of crime victims or other identifiable information regarding victims in the Daily Crime Log or in the annual crime statistics that are disclosed in compliance with the *Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act*. Furthermore, if a Timely Warning Notice is issued on the basis of a report of domestic violence, dating violence, sexual assault or stalking, the name of the victim and other personally identifiable information about the victim will be withheld.

Adjudication of Violations

The College’s disciplinary process includes a prompt, fair, and impartial initial investigation and final resolution process. In all instances, the process will be conducted in a manner that is consistent with the institution’s policy and that is transparent to the accuser and the accused. Usually, the resolution of domestic violence, dating violence, sexual assault and stalking complaints are completed within the timeframe specified in each policy the institution maintains. However, each procedure allows for extensions of timeframes for good cause with written notice to the accuser and the accused of the delay and the reason for the delay. College officials involved in the investigation or adjudication of domestic violence, dating violence, sexual assault and stalking complaints are trained annually on the issues related to domestic violence, dating violence, sexual assault, and stalking as

well as how to conduct an investigation and hearing process that protects the safety of the victim and promotes accountability. Furthermore, each policy provides that:

1. The accuser and the accused will have timely notice for meetings at which the accuser or accused, or both, may be present;
2. The accuser, the accused and appropriate officials will have timely and equal access to any information that will be used during formal and informal disciplinary meeting and hearings;
3. The institutional disciplinary procedures will not be conducted by officials who have a conflict of interest or bias for or against the accuser or the accused;
4. The accuser and the accused will have the same opportunities to have others present during any institutional disciplinary proceeding. The accuser and the accused each have the opportunity to be advised by an advisor of their choice at any stage of the process and to be accompanied by that advisor to any related meeting or proceeding. The College will not limit the choice of advisor or presence for either the accuser or the accused in any meeting or institutional disciplinary proceeding. However, the role of the advisor is limited. An advisor may only consult and advise his or her advisee but not speak for the advisee at any meeting or hearing.
5. The accuser and the accused will be notified simultaneously, in writing, of the any initial, interim and final decision of any disciplinary proceeding; and
6. Where an appeal is permitted under the applicable policy, the accuser and the accused will be notified simultaneously in writing, of the procedures for the accused and the victim to appeal the result of the institutional disciplinary proceeding. When an appeal is filed, the accuser and the accused will be notified simultaneously in writing of any change to the result prior to the time that it becomes final as well as of the final result once the appeal is resolved.

Whether or not criminal charges are filed, the College or a person may file a complaint under the following policies, depending upon the status of the accused (student or employee)

Grievance Process for Formal Complaints of Sexual Harassment for Employees

The grievance process treats complainants and respondents equitably by providing remedies to a complainant where a determination of responsibility for sexual harassment has been made against the respondent and by following the grievance process before the imposition of any disciplinary sanctions or other actions that are not supportive measures. Respondents are presumed not responsible for the alleged conduct until a determination regarding responsibility is made at the conclusion of the grievance process.

The Title IX Coordinator, Alternate Title IX Coordinator, investigator(s), any decision-maker(s), including any Adjudicator and the Appeal Board member, and any person designated to facilitate an information resolution process may not have a conflict of interest or bias for or against complainants or respondents generally or an individual complainant or respondent.

Reporting Sex Discrimination and Sexual Harassment

Any person may report sexual harassment (whether or not the person reporting is the person alleged to be the victim of conduct that could constitute sex discrimination or sexual harassment), in person, by mail, by telephone, or by electronic mail, using the contact information listed for the Title IX Coordinator, or by any other means that results in the Title IX Coordinator receiving the person's verbal or written report, including reporting to the Alternate Title IX Coordinator listed in Section 4.3 of the Administrative and Support Staff Handbook. A report may be made at any time (including during non-business hours) by using the telephone number or electronic mail address, or by mail to the office address, listed for the Title IX Coordinator.

Officials with authority are required to promptly report incidents or allegations of sexual harassment to the College's Title IX Coordinator or Alternate Title IX Coordinator. Where an official with authority is the complainant, you are strongly encouraged to report the misconduct to the College's Title IX Coordinator or Alternate Title IX Coordinator.

Any person who is not an official with authority, including students and members of the College community, are strongly encouraged to promptly report incidents or

allegations of sex discrimination and sexual harassment to the College's Title IX Coordinator or Alternate Title IX Coordinator.

Title IX Coordinators

The Title IX Coordinator is the designated agent of the College with primary responsibility for receiving reports and formal complaints of sexual harassment, signing formal complaints, and generally coordinating the College's compliance with Title IX. The Title IX Coordinator's responsibilities include overseeing the College's response to reports and formal complaints of sexual harassment, including supportive measures, as well as overseeing the College's documentation and recordkeeping set forth in Section 7.0 of the Administrative and Support Staff Handbook. The Title IX coordinator provides educational materials and training on Title IX, and generally provides guidance and ensures a fair process for individuals involved in Title IX complaints.

Below is the contact information for the Title IX Coordinator:

Spencer K. Izor, M.Ed., J.D.
Associate Vice President – Compliance
1870 Quaker Way
Wilmington, Ohio 45177
Tel: (937) 481-2365 (Ext. 365)
E-mail: spencer.izor@wilmington.edu

If the Title IX Coordinator has a conflict of interest in handling or is otherwise unable to handle the Title IX matter at issue, the Chief of Human Resources will act as the Alternate Title IX Coordinator for that matter. Below is the contact information for the Alternate Title IX Coordinator:

Terron Cruey
Chief of Human Resources
1870 Quaker Way
Wilmington, Ohio 45177
Tel: (937) 481-2282 (Ext. 282)
E-mail: terron.cruey@wilmington.edu

Offering and Providing Supportive Measures

Where the Title IX Coordinator receives a report of an incident or allegation of sexual harassment from any individual, including an official with authority or complainant, the Title IX Coordinator will promptly contact the complainant to discuss the availability of supportive measures and inform the complainant of the availability of such supportive measures with or without filing of a formal complaint. The Title IX Coordinator will also provide to the complainant a copy of this Policy and explain to the complainant their right to file a formal complaint and the process for filing a formal complaint, as outlined in below.

Supportive measures are non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the complainant or the respondent before or after the filing of a formal complaint or where no formal complaint has been filed. Such measures are designed to restore or preserve equal access to the College's education program or activity without unreasonably burdening the other party, including measures designed to protect the safety of all parties or the College's educational environment, or deter sexual harassment. Supportive measures may include, but are not limited to, the following:

- a) Extensions of deadlines or other course-related adjustments;
- b) Modifications of work or class schedules;
- c) Campus escort services;
- d) Mutual restrictions on contact between parties—e.g., a no-contact order;
- e) Changes in work or housing locations;
- f) Leaves of absence;
- g) Increased security and monitoring of certain areas of campus; and
- h) Other similar measures.

The Title IX Coordinator is responsible for coordinating the effective implementation of supportive measures and will consider the complainant's wishes with respect to supportive measures.

The College will maintain the confidentiality of any supportive measures provided to the complainant or respondent, to the extent that maintaining such confidentiality would not impair the ability of the College to provide the supportive measures. To the extent an individual chooses to report an incident or allegation of sexual harassment anonymously or without disclosing the identity of the complainant and/or the respondent, the College will be unable to provide supportive measures to the complainant and/or consider whether to initiate the grievance process against a respondent in response.

Written Notice of Allegations

Upon receipt of a formal complaint, the Title IX Coordinator will provide written notice to known parties that includes the following:

- a) notice of this grievance process;
- b) notice of the allegations of sexual harassment with sufficient details known at the time, including,
 - i. the identities of the known parties involved in the incident,
 - ii. the conduct allegedly constituting sexual harassment, and
 - iii. the date and location of the alleged incident, if known;
- c) a statement that the respondent is presumed not responsible for the alleged conduct and that a determination regarding responsibility is made at the conclusion of the grievance process;
- d) notice that the parties may have an advisor of their choice, who may be, but is not required to be, an attorney consistent with Section 5.7.2 of the Administrative and Support Staff Handbook;
- e) notice that the parties may inspect and review evidence obtained as part of the investigation that is directly related to the allegations raised in the formal complaint consistent with Section 5.7.5 of the Administrative and Support Staff Handbook;
- f) notice of any provision in the College's code of conduct that prohibits knowingly making false statements or knowingly submitting false information during the grievance process; and
- g) notice that making a good faith formal complaint that is not later substantiated does not constitute providing false or misleading information.

Written notice will be provided with sufficient time to prepare a response before any initial interview.

If, in the course of the investigation, the College decides to investigate allegations about the complainant or respondent that were not included in the written notice provided above, the Title IX Coordinator will provide written notice of the additional allegations to known parties.

Dismissal of Formal Complaint

While the College will investigate the allegations in formal complaints of sexual harassment, it will dismiss a formal complaint where the conduct alleged:

- a) would not constitute sexual harassment, even if proven;
- b) did not occur in the College's education program or activity—i.e., locations or events, or under circumstances over which the College exercises substantial control over both the respondent and the context in which the sexual harassment occurs, including any building owned or controlled by a student organization that is officially recognized by the College; or
- c) did not occur against a person in the United States.

Such mandatory dismissal, however, does not preclude action under another provision of the College's code of conduct.

The College may dismiss a formal complaint or any allegation therein, if at any time during the investigation or hearing:

- a) a complainant notifies the Title IX Coordinator in writing that the complainant would like to withdraw the formal complaint or any allegations therein;
- b) the respondent is no longer enrolled or employed by the College; or
- c) specific circumstances prevent the College from gathering evidence sufficient to reach a determination as to the formal complaint or allegations therein.

For example, where the identity of a complainant is not disclosed, the College may not be able to gather evidence necessary to establish the elements of sexual harassment, such as whether the alleged conduct was unwelcome or without consent. In such instances, discretionary dismissal may be appropriate.

The Title IX Coordinator will make determinations regarding dismissal and will promptly notify the parties in writing of any dismissal and the reasons therefore.

Time Frame and Temporary Delays

Upon receipt of a sexual harassment complaint, the College will exercise good faith to investigate and conclude the grievance process in a reasonably prompt time frame.

- a) Once a formal complaint of sexual harassment has been made, an investigation into the complaint will be conducted by the investigator(s) within sixty (60) days of the complaint being made.
- b) Consistent with Section 5.7.5 of the Administrative and Support Staff Handbook, prior to the completion of the investigative report (see Section 5.7.6), the Title IX Coordinator will send to each party and the party's advisor, if any, the evidence subject to inspection and review in electronic format or hard copy, with any redactions required by the Family Page Educational Rights and Privacy Act ("FERPA"). The parties will have ten (10) days to submit a written response, which the investigator(s) will consider prior to completion of the investigative report.
- c) Consistent with Section 5.7.6 of the Administrative and Support Staff Handbook, the investigator(s) will create an investigative report that fairly summarizes relevant evidence within ninety (90) days of the complaint being made.
- d) The Title IX Coordinator will send to each party and the party's advisor, if any, a copy of the final investigative report, in electronic format or hard copy, with any redactions required by FERPA, for their review and written response within three (3) days of completing the investigative report and at least ten (10) days prior to the hearing.

- e) A hearing before the Adjudicator will be held within one hundred and twenty (120) days of the complaint being made.
- f) The Adjudicator will issue a written determination regarding responsibility within fourteen (14) days of the hearing.

Temporary delay of the grievance process or a limited extension of time frames may be permitted for good cause. Good cause may include, but is not limited to, the absence of a party, a party's advisor, or a witness; concurrent law enforcement activity; or the need for language assistance or accommodation of disabilities. The Title IX Coordinator will provide written notice to the complainant and the respondent of any temporary delay or limited extension and the reasons for such action.

Evidentiary Standard & Evidence

Determinations regarding responsibility for all formal complaints of sexual harassment, whether against a student or employee, will be made using the preponderance of the evidence standard.

Parties are provided an equal opportunity to participate fully and robustly in the investigation process by gathering and presenting evidence, including fact and expert witnesses and other evidence, reviewing the evidence gathered, responding to the investigative report that summarizes relevant evidence, and asking questions of other parties and witnesses before the Adjudicator has reached a determination regarding responsibility.

However, while not a party to the proceedings, the College bears the burden of proof and the burden of gathering evidence sufficient to reach a determination regarding responsibility provided that the College cannot access, consider, disclose, or otherwise use a party's records that are made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in the professional's or paraprofessional's capacity, or assisting in that capacity, and which are made and maintained in connection with the provision of treatment to the party, unless the College obtains that party's voluntary, written consent to do so.

This Policy also does not require, allow, rely upon or otherwise use questions or evidence that constitute or seek disclosure of information protected under legally recognized privilege, such as the attorney–client privilege or the doctor–patient privilege, unless the person holding such privilege waives it.

Investigator(s) must objectively and impartially gather and present any relevant evidence to the Adjudicator in an investigative report, who, in turn, must objectively and impartially evaluate relevant evidence and reach a determination regarding responsibility.

All relevant evidence discovered during this grievance process, including inculpatory and exculpatory evidence, will be evaluated on an objective basis. All credibility determinations will not be based on a person’s status as a complainant, respondent, or witness.

Consolidation of Formal Complaints

The College may consolidate formal complaints as to allegations of sexual harassment against more than one respondent, or by more than one complainant against one or more respondents, or by one party against the other party, where the allegations of sexual harassment arise out of the same facts or circumstances.

Where a grievance process involves more than one complainant or more than one respondent, references in this Policy to the singular “party,” “complainant,” or “respondent” include the plural, as applicable.

Emergency Removal & Administrative

In addition to implementing supportive measures set forth above, in emergency situations that arise out of allegations of conduct that could constitute sexual harassment, the College may elect to remove the respondent from the College’s education programs or activities. Removal may be made only after the College conducts an individualized safety and risk analysis and concludes that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of sexual harassment justifies removal. Removal may take place before an investigation into sexual harassment allegations concludes or where no grievance process is pending. The Title IX Coordinator may make removal decisions on behalf of the College and may periodically reassess whether an immediate threat

to physical health or safety is ongoing or has dissipated such that removal is no longer warranted.

Where the College elects to remove a respondent from its education programs or activities, it will provide the respondent with notice and an opportunity to challenge the decision immediately following removal. The respondent must make any challenge to the Title IX Coordinator. Where a respondent is a non-student employee, the College may also elect to place the respondent on administrative leave during the pendency of a grievance process under Section 5.0. The Director of Human Resources may make administrative leave decisions on behalf of the College and may periodically reassess whether administrative leave is warranted during the grievance process.

Hazing Policy Statements

Wilmington College prohibits students, employees, officers, contractors, and volunteers from engaging, or attempting to engage in Hazing. The College defines Hazing as:

1. any intentional, knowing, or reckless act committed by a person (whether individually or in concert with other persons) against another person or persons regardless of the willingness of such other person or persons to participate, that—
 - is committed in the course of an initiation into, an affiliation with, or the maintenance of membership in, a student organization; and
 - causes or creates a risk, above the reasonable risk encountered in the course of participation in the institution of higher education or the organization (such as the physical preparation necessary for participation in an athletic team), of physical or psychological injury including –
 1. whipping, beating, striking, electronic shocking, placing of a harmful substance on someone's body, or similar activity;
 2. causing, coercing, or otherwise inducing sleep deprivation, exposure to the elements, confinement in a small space, extreme calisthenics, or other similar activity;
 3. causing, coercing, or otherwise inducing another person to consume food, liquid, alcohol, drugs, or other substances;
 4. causing, coercing, or otherwise inducing another person to perform sexual acts;

5. any activity that places another person in reasonable fear of bodily harm through the use of threatening words or conduct;
 6. any activity against another person that includes a criminal violation of local, State, Tribal, or Federal law; and
 7. any activity that induces, causes, or requires another person to perform a duty or task that involves a criminal violation of local, State, Tribal, or Federal law.
2. Hazing also involves any other activity not addressed by (1) of this definition that is expected of someone joining or participating in a student organization that humiliates, degrades, abuses, or endangers them, regardless of a person's willingness to participate.

For purposes of the College's Hazing policy, the phrase "student organization" means "an organization at Wilmington College (such as a club, society, association, varsity or junior varsity athletic team, club sports team, fraternity, sorority, band, or student government) in which two or more of the members are students enrolled at the College." While student organizations that are not recognized or established by the College are not subject to the College's disciplinary jurisdiction, individuals who engage in violations of the standards of conduct outlined in the College's Hazing policy will be held accountable regardless of whether the student organization in which the Hazing activities occurred is recognized or established by the institution.

Any student organization recognized or established by the College that is found to be responsible for violating the College's Hazing policy will be recorded in the Campus Hazing Transparency Report. However, all reports of hazing involving student organizations that occur in the College's Clery Geography will be included in the crime statistics regardless of whether the organization is established or recognized by the institution.

The College reserves the right to hold a sub-group of an organization accountable for Hazing policy violations, rather than the entire student organization, when circumstances reasonably indicate a sub-group, not the entire student organization, committed a Hazing policy violation. For example, affinity groups or position groups within an athletic team that meet the definition of student organization may be held accountable for Hazing in lieu of the entire athletic team.

How to Report Hazing

Any individual who experiences or witnesses Hazing is strongly encouraged to report the incident immediately. Any incident involving an in-progress crime or emergency should be reported immediately to the local law enforcement agency with jurisdiction by dialing 911.

Reports can be made in person, by phone, or by email using the contact information below.

Incidents of Hazing involving students can be reported to:

- (a) Campus Safety at (937) 382-0100 or
- (b) Dean of Students Office at
- (c) Office of Compliance and Integrity at (937) 481-2365

Incidents of Hazing involving employees can be reported to:

- (a) Campus Safety at (937) 382-0100
- (b) Office of Human Resources at (937)-481-2282
- (c) Office of Compliance and Integrity at (937) 481-2365

Process Used to Investigate Hazing Reports

Upon receipt of a report alleging Hazing, the Vice President, Chief Student Affairs, Officer/Dean of Students, or designee, will review the report and determine if the alleged behavior, as described in the report, would constitute Hazing as defined by the College. The Vice President, Chief Student Affairs, Officer/Dean of Students, or designee, will also determine which College official(s) or office(s) have jurisdiction over the respondent(s). As it relates to the College's Hazing policy, the term "respondent" refers to a student, a recognized or registered student organization, or an employee who is alleged to have engaged in Hazing.

The Vice President, Chief Student Affairs, Officer/Dean of Students, or designee, is empowered to take reasonable steps to obtain additional information that may be necessary to determine if a policy violation has been alleged or to determine if an investigation is warranted. The Vice President, Chief Student Affairs, Officer/Dean of Students may consult with applicable College officials when determining which individual(s) or office(s) have jurisdiction over the respondent(s). When determining

jurisdiction, the Vice President, Chief Student Affairs, Officer/Dean of Students, or designee, will consider:

- the nature of the alleged conduct,
- the circumstances of the report, and
- whether the respondent is a person or student organization subject to the College's conduct standards.

These factors will also inform whether the procedures outlined in the Student Handbook will be utilized to resolve the alleged misconduct. Allegations of Hazing involving a student or a student organization that is officially recognized by, or registered with, the College will be resolved using the procedures outlined in the Student Handbook. Allegations involving other respondents will be resolved using the policies and procedures applicable to the respondent's status.

Interim Action

In response to the report, the Vice President, Chief Student Affairs, Officer/Dean of Students or designee, may impose an interim administrative action on a respondent prior to the resolution when a threat of imminent harm to persons or property exists, and/or there is potential for significant disruption to the community that exists during the course of investigation. If the respondent is an employee, the applicable College official(s) may impose interim administrative action consistent with the policies and procedures applicable to the employee.

Interim action is not a sanction. It is taken in an effort to protect the safety and well-being of individuals and the College community. Interim administrative action is preliminary in nature; it is in effect only until there is a resolution of the matter. The respondent may challenge the interim action in writing to the next level of conduct authority within five (5) days of the imposition of the interim action. The interim action will be in effect during the challenge.

Investigation

If an investigation is warranted, the Vice President, Chief Student Affairs, Officer/Dean of Students, or designee, shall appoint one or more investigators to conduct a prompt, thorough, and impartial investigation. External investigators may be appointed at the discretion of the Vice President, Chief Student Affairs, Officer/Dean of Students. Reports of alleged Hazing that also allege violations of the College's Sex Discrimination and Sexual Harassment Policy will be coordinated

between the Associate Vice President – Compliance, or designee and to determine the appropriate investigation and/or resolution procedures.

The respondent (typically the president for a registered/recognized student organization, or its equivalent for an established organization) will be sent a written notice of the allegations by way of their college supplied e-mail account. If the student organization has a national or oversight entity, that entity may be apprised of the College's investigation at the discretion of the Vice President, Chief Student Affairs, Officer/Dean of Students. The national or oversight entity cannot speak on behalf of or represent the student organization.

Reasonable efforts will be made to complete the investigation in a timely manner. Typically, the College will aim to complete an investigation into allegations of Hazing within 45 business days of providing written notice of the investigation to the respondent, though investigations may extend beyond 45 business days as circumstances require.

During the investigation, the respondent will be provided with an opportunity to: provide information through an in-person or virtual interview, submit a written account, provide the names of incident witnesses for possible interviews with the investigator(s), provide witness statements, and provide any documentation that may be relevant to the facts of the allegations. However, the investigator(s) may consider information from any sources the investigator(s) deem relevant and credible. The investigator(s) will make reasonable efforts to obtain relevant supporting documentation related to the allegations from other College official(s) or available resources.

Upon completion of the investigation, the investigator(s) will prepare an investigation report. The investigation report will summarize the information gathered and include detailed findings-of-fact regarding the behaviors in question.

The investigator(s) will submit an investigation report to the appropriate College official(s) with jurisdiction over the respondent(s). The applicable official(s) will determine whether the respondent(s) violated the College's Hazing policy using the resolution procedures applicable to the respondent(s). If the respondent(s) are found to have violated the College's Hazing policy, the applicable official(s) will impose appropriate sanctions.

All respondents will be informed, in writing, of the College's findings and any sanctions imposed. Any opportunity for the respondent to appeal will follow the relevant policies and procedures applicable to the respondent.

Respondents who violate the College's Hazing policy will be subject to conduct sanctions, which may include probation, loss of privileges, loss of recognized/registered status, mandatory training or education, suspension, expulsion, administrative leave, revocation of tenure, or termination. Respondents can also face sanctions under other College policies as well as criminal or civil penalties imposed under applicable law.

Information Regarding Applicable Local, State, and Tribal Laws on Hazing

In addition to the College's Hazing policy, members of the campus community should be aware of applicable jurisdictional laws pertaining to Hazing.

Ohio enacted its Anti-Hazing Act commonly referred to as "Collin's Law" in 2021. In Ohio, institutions of higher education must follow both state and federal anti-hazing laws. Ohio defines hazing in ORC Section 2903.31 as:

Hazing

(A) As used in this section:

- (1) "Hazing" means doing any act or coercing another, including the victim, to do any act of initiation into any student or other organization or any act to continue or reinstate membership in or affiliation with any student or other organization that causes or creates a substantial risk of causing mental or physical harm to any person, including coercing another to consume alcohol or a drug of abuse, as defined in section 3719.011 of the Revised Code.
- (2) "Organization" includes a national or international organization with which a fraternity or sorority is affiliated.

(B)

- (1) No person shall recklessly participate in the hazing of another.

- (2) No administrator, employee, faculty member, teacher, consultant, alumnus, or volunteer of any organization, including any primary, secondary, or post-secondary school or any other educational institution, public or private, shall recklessly permit the hazing of any person associated with the organization.

(C)

- (1) No person shall recklessly participate in the hazing of another when the hazing includes coerced consumption of alcohol or drugs of abuse resulting in serious physical harm to the other person.
- (2) No administrator, employee, faculty member, teacher, consultant, alumnus, or volunteer of any organization, including any primary, secondary, or post-secondary school or any other educational institution, public or private, shall recklessly permit the hazing of any person associated with the organization when the hazing includes coerced consumption of alcohol or drugs of abuse resulting in serious physical harm to that person.

(D) Whoever violates this section is guilty of hazing. A violation of division (B)(1) or (2) of this section is a misdemeanor of the second degree. A violation of division (C)(1) or (2) of this section is a felony of the third degree.

There are no applicable local or Tribal laws relating to hazing in the College's jurisdiction.

Ohio enacted its Anti-Hazing Act commonly referred to as "Collin's Law" in 2021. In addition to expanding the definition of hazing, Ohio's Anti-Hazing Act also requires that those roles named in the above section, when acting in an official and professional capacity, immediately report hazing to law enforcement within the county in which the victim of hazing resides or where the hazing occurred. ORC § 2903.311 (2021). Additionally, Collin's Law mandated that Ohio's Department of Higher Education develop a statewide hazing prevention educational plan and ancillary resources to assist institutions of higher education in the state with preventing hazing.

Campus Hazing Transparency Report

As required by the Stop Campus Hazing Act, the College publishes a Campus Hazing Transparency Report that summarizes findings concerning student organizations established or recognized by the College that have been found responsible for violating the College's Hazing policy. The Transparency Report will be updated to include new findings of organizational responsibility no less than twice annually following a final determination that a student organization has violated the College's Hazing policy. The first Transparency Report will be published by December 23, 2025, unless no organizations have been found responsible for Hazing at that time, as the College is not required to publish a Transparency Report until a student organization has been found responsible for violating the College's Hazing policy on or after July 1, 2025.

Each entry published to the Transparency Report will include, at a minimum, the following information:

- the student organization;
- a general description of the violation that resulted in a finding of responsibility;
- whether the violation involved the abuse or illegal use of alcohol or drugs;
- the findings of the institution (i.e., the rationale for finding the organization responsible for Hazing);
- any sanctions placed on the student organization; and
- the dates on which—
 - the incident was alleged to have occurred,
 - the investigation into the incident was initiated,
 - the investigation ended with a finding that a Hazing violation occurred, and
 - the student organization was provided notice that the incident resulted in a Hazing violation.

Hazing Prevention and Awareness Programs

The College provides Hazing prevention and awareness programs that are informed by research, campus-wide in scope, and designed to reach all students, staff, and faculty.

Programs address various topics, including:

- the College's definition of Hazing, including a clear statement that the College prohibits Hazing;
- the definition of Student Organization, as it applies to the College's Hazing policy;
- how to report Hazing;
- the process the College will use to investigate reports of Hazing;
- information on applicable local, State, and Tribal laws regarding Hazing; and
- primary prevention strategies intended to stop Hazing before it occurs (including bystander intervention, ethical leadership, and strategies for building group cohesion).

These programs are part of the College's comprehensive strategy to prevent incidents of Hazing before they occur. These programs also raise awareness about the College's Campus Hazing Transparency Report that summarizes findings concerning student organizations established or recognized by the College that have been found responsible for violating the College's Hazing policy.

Specifically, the College provides Hazing prevention and awareness programs to students by in person presentations such as "Elect to Respect: Leading with Civility," "New Member Education Anti-Hazing Presentation," and online/ on demand trainings such as "Hazing Prevention: What Every College Student Needs to Know," and "Are you a Bully? How to Recognize & Respond to Bullying and Hazing."

Additionally, the College provides Hazing prevention and awareness programs to employees by online and on demand trainings such as Investigating Hazing Complaints; Case Study Insights for Effective and Actionable Strategies and "Stop Campus Hazing Act: What Administrators Must Know to Stay Compliant."

Access to Campus Facilities and Security Policies

Students, faculty, staff, and other employees of Wilmington College have access to academic, administrative, and recreational facilities on campus, during normal business hours. Access to residence halls is limited primarily to students and their guests. Guests may visit residents in student's rooms or lounges in accordance with the visitation policy. The general public is welcome to attend most cultural and sports events, unless otherwise stipulated. However, the general public does not have access to the campus or college facilities on a regular, routine basis.

Exceptions are made for specified community service programs and public relations purposes. The College reserves the right to ask anyone with offensive behavior to leave the property.

The Physical Plant Department maintains campus physical facilities with sensitivity to safety, for example, proper maintenance of campus lighting on walkways and in parking lots, trimming of shrubbery, etc.

The outside doors of the residence halls are locked and should not be propped open. Each residence hall room has a door lock, and students are encouraged to keep their room keys on their person and to lock their room doors at night and at all other times when the room is not occupied. The Code of Conduct works well, but with guests often present, especially on weekends, the residence halls become much more public. Thus, good judgment is encouraged. Students should take common sense precautions to protect their personal property, such as marking stereos, cameras, televisions, computers, and the like. In addition, valuables left in a car should be locked in the trunk, if applicable, and the motor vehicle itself should be locked when parked. During holiday periods students are expected to secure their own belongings by locking room doors and windows when the room is vacated and by taking valuable items with them for the holiday. Students are urged to report to Campus Safety officers or other personnel, as appropriate, any suspicious-looking individuals whom they believe do not belong in their residence halls or other College buildings and any troubling, unusual incidents in or around residence halls or elsewhere on campus. It is the policy of this College to disclose to victims of violent crime the results of any disciplinary actions taken against those who violate the Code of Conduct in this context.

Security of Campus

Wilmington College schedules campus safety officers 24 hours a day and 7 days a week to provide security for the campus buildings and grounds in an effective and non-aggressive manner. For the protection of all students, the Campus Safety Office maintains records of all persons found in academic buildings after lock-up time as well as reports of incidents involving violations of law or College regulations in which a Campus Safety officer is involved or receives a report.

Violations should be reported to the Campus Safety Office as well as to outside law agencies when appropriate. Only in cases involving a need for direct confrontation of law offenders or when health or property are threatened will an outside law enforcement agency be called.

Campus Safety

For the protection of all students, the Campus Safety Office maintains written records of persons found in academic buildings after scheduled lockup times, as well as reports and, at times, photographs of incidents involving violations of law or College regulations in which a Campus Safety officer is involved or receives a report. Violations should be reported to the Campus Safety Office as well as to outside law agencies when appropriate. An outside law enforcement agency will be contacted in cases involving a need for direct confrontation of law offenders or when health or property is threatened.

Whether a Wilmington College parking permit is purchased or not, all vehicles parked on campus property must be registered with the College. Parking regulations, including non-registration of vehicles, will be enforced by Campus Safety. These regulations and their associated fines can be found in the Student Handbook.

Alcohol Policy

Wilmington College prohibits the unlawful possession, use, and sale of alcoholic beverages on campus. The Campus Safety is responsible for the enforcement of state underage drinking laws.

It is the College's intention to provide a nurturing environment that fosters student development and autonomy. This can best be accomplished by providing latitude for individual choice with regard to personal use of alcohol. However, that freedom of choice exists with the understanding that students will comply with federal and state law and College policies, take full responsibility for their conduct, and ensure that their behavior does not impinge upon the rights and needs of others. Freedom of choice also requires knowledge of the impact of alcohol abuse on one's health.

The Drug-Free Schools and Communities Act-The Drug-Free Schools and Communities Act requires each institution of higher education to certify that it has adopted and implemented a program to prevent the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees.

Failure to comply can result in the loss of funds and any other form of financial assistance under any Federal program, including participation in any federally funded or guaranteed student loan program, The Drug- Free Schools Communities Act further requires the College to inform faculty, students, and staff about:

- the College's standards of conduct regarding alcohol use and the sanctions that may be imposed on students who violate these standards;
- applicable legal sanctions under local, state, and federal laws for the unlawful possession, use, or distribution of illicit drugs and alcohol;
- the health risks associated with the use of illicit drug and the abuse of alcohol; and
- available counseling, treatment, or rehabilitation or re-entry programs in place that address substance abuse.

In compliance with the Drug Free Schools and Communities Act, Wilmington College publishes information regarding the College's prevention programs related to drug and alcohol abuse prevention which include standards of conduct that prohibit the unlawful possession, use, and distribution of alcohol and illegal drugs on campus and at institution-associated activities; sanctions for violations of federal, state, and local laws and College policy; a description of health risks associated with alcohol and other drug use and abuse; and a description of available

counseling, treatment, rehabilitation and/or re-entry programs for Wilmington College students and employees.

Wilmington College has a variety of prevention and education alternatives available to students, as well as sanctions designed to assist individuals determined to reduce alcohol or other substance abuse problems. Initial screening/assessment interactions and initial counseling sessions are available both on a voluntary basis and through the alcohol policy's sanctioning process. However, the most effective means of addressing positive change is the willingness of members of the community who know and care for each other to face issues such as these and address concerns, values, and expectations to one another. Anyone experiencing problems with their own or someone else's use of alcohol should consult available resources, both on campus and in the local area. Screening, evaluation, and intervention for any student using drugs.

Drug Policy

As an academic community, Wilmington College is committed to providing an environment in which learning, and scholarship can flourish. The possession or use of illegal drugs, or the abuse of those which may otherwise be legally possessed, seriously affects the College's environment, as well as the individual potential of our students. The College enforces all applicable federal, state, and local laws and College policies.

Prohibition of Illicit Drugs Wilmington College prohibits the unlawful use, possession, sale, manufacture, or distribution of illicit drugs on college property and as part of any College activity. Students must comply fully with all federal, state, and municipal regulations regarding the use, cultivation, manufacture, sale, distribution, and/or possession of drugs or controlled substances. In addition, the misuse of substances which present physical or psychological hazards to individuals is prohibited.

The Chief of Campus Safety has primary responsibility for the enforcement of Federal and State drug laws.

Violations of the Drug Policy include but are not limited to:

- Knowing possession of drug paraphernalia.
- Misuse of prescription drugs or over-the-counter medications.
- The use, cultivation, manufacture, sale, distribution, and/or possession of drugs or controlled substances in violation of federal, state, or municipal laws is prohibited by the College and is not permitted in the residence halls or on any College property.
- Failure to report the use, cultivation, manufacture, sale, distribution, and/or possession of illegal substances on any College property to a college official.

Being knowingly present during the use of illegal drugs or the misuse of prescription drugs, over-the-counter medications, or other substances which present physical or psychological hazards to individuals.

Missing Student Notification Policy and Procedures

When students first enroll, they complete data sheet so that quick notification can be made to primary and/or secondary contacts in the event of an emergency. It is the student's responsibility to update this information when changes occur. This data sheet allows student to identify an initial contact for the College. Students residing in campus housing will be informed annually that each student has the option to identify a person designated as a confidential missing person contact to be notified by Wilmington no later than 24 hours after the time the student is determined to be missing by the designated College officials authorized to make that determination (specifically, the Campus Safety) or the local law enforcement agency in which the student went missing. When students are informed of their option to provide a confidential contact, they are advised that their contact information will be registered confidentially, and that this information will be accessible only to authorized campus officials and law enforcement and that it may not be disclosed outside of a missing person investigation. Students are advised that, in the event a student under 18 years of age and not emancipated, Wilmington College must notify a custodial parent or guardian within 24 hours of the determination that the student is missing , students are also advised that, in addition to notifying any additional contact person designated by the student. Students are advised that, for all missing students, Wilmington College will notify the local law enforcement agency within 24 hours of the determination that the student is missing, unless the local law enforcement agency was the entity that made the determination that the student is missing.

In the event that a student is determined to be missing for 24 hours, the College will notify the missing person contact no later than 24 hours after the student is determined missing in accordance with our official notification procedures. If a current data sheet is not on file, the College will notify the parents documented in our records. In the event that the student is under 18 years of age, and not an emancipated individual, we are required to notify custodial parents or guardians and any other designated contact person within 24 hours.

Anyone who believes that a student is missing should report it immediately to Campus Safety by calling 937-382-0100. If members of the Wilmington College community believe that a student has been missing for 24 hours, it is critical that they report that information to Campus Safety by calling 937-382-0100. Details will be asked regarding the last time the student was seen, where the student was seen, and any communications that have been received. Campus personnel who may have information regarding this student will be contacted and asked to provide their last known contact with this student. If it is determined that no contact has been made with the student in question for more than 24 hours, Campus Safety will notify other appropriate law enforcement agencies within 24 hours of the determination the student has been missing for 24 hours, and request assistance in finding the missing student. Regardless of whether the student has identified a contact person, is above the age of 18, or is an emancipated minor, Wilmington College will inform the Wilmington Police Department (or the local law enforcement with jurisdiction) that the student is missing within 24 hours.

Reporting Criminal Actions and/or Emergencies

The Campus Safety Office is located at 578 Withrow Circle. It is the policy of the College to have campus safety personnel and/or other appropriate staff responds to any reported crime or emergency involving a threat to personal safety and security or to enlist the help of local police agencies or emergency services, such as the City of Wilmington Police Department, which can be reached by calling 911. For direct telephone access to the Campus Safety Office, dial 382-0100. Campus Safety Officers are on duty 24 hours per day.

Residence Life has professional staff on call 24 hours a day, If you feel threatened or have a safety or security concern and are unsure of what to do, your RA/CA—or any other RA/CA—can be of assistance in contacting these emergency personnel. Any member of the Student Affairs Staff is always willing to assist.

Where the nature of a problem is such that other support devices are required, such as counselors and health services professionals, Campus Safety officers or

personnel in the VP, Chief Student Affairs Officer/Dean of Students' office will make the contacts, as deemed necessary. You are also urged to report all acts of violence or crimes, including theft, to Campus Safety personnel, the VP, Chief Student Affairs Officer/Dean of Students, or members of his/her staff including the Housing & Residence Life Staff. All crimes must be reported no matter when they are discovered.

Response to a Report

Follow-up action will be taken to investigate each incident so that accurate records can be maintained.

Campus Safety Officers are available at 937-382-0100, 24 hours a day to answer your calls. In response to a call, Campus Safety will take the required action, either dispatching an officer or asking the victim to report to Campus Safety to file an incident report. All reported crimes will be investigated by the College and may become a matter of public record. All Campus Safety incident reports are forwarded to the Dean of Students Office for review and referral for Formal Judicial Review for potential action, as appropriate. Campus Safety Investigators will investigate a report when it is deemed appropriate. Additional information obtained via the investigation will also be forwarded for Formal Judicial Review.

If assistance is required from the Wilmington Police Department or the Wilmington Fire Department, Campus Safety will contact the appropriate unit. If a sexual assault or rape should occur, staff on the scene, including Campus Safety, will offer the victim a wide variety of services.

Reporting to Meet Disclosure Requirements

Members of the community are helpful when they immediately report crimes or emergencies to the Campus Safety at 937-382-0100 and/or the following primary campus security authorities for purposes of including them in the annual statistical disclosure and assessing them for issuing a Timely Warning Notices, when deemed necessary:

Spencer K. Izor
Associate Vice President – Compliance
spencer.izor@wilmington.edu
937-481-2365

Sigrid Solomon
Vice President, Chief Student Affairs Officer/Dean of Students
sigrid.solomon@wilmington.edu

Nick Hoover
Director, Housing and Residence Life
nick.hoover@wilmington.edu
937-481-2369

Matt Croci
Director of Athletics
matt.croci@wilmington.edu
937-481-2364

Kelly Siders
Director of Health Services
kelley.siders@wilmington.edu
937-481-2217

Kazi McDowell
Director of Counseling Services
kazi.mcdowell@wilmington.edu
937-481-2272

Terron Cruey
Vice President, Chief, Human Resources
terron.cruey@wilmington.edu

George Dimidik
Vice President, IT and Operations
george.dimidik@wilmington.edu
937-481-2543

Wynn Alexander
Vice President for Academic Affairs/Dean of Faculty/Professor of Theatre
wynn.alexander@wilmington.edu
937-481-2203

Accurate and Prompt Reporting

Crimes should be accurately and promptly reported to the Campus Safety or the appropriate police agency, when the victim of a crime elects to, or is unable to, make such a report.

Voluntary Confidential Reporting

The Campus Safety encourages anyone who is the victim or witness of any crime to promptly report the incident to the police. Campus Safety does not have a voluntary confidential reporting process because police reports are public records under state law, thus Campus Safety cannot hold reports of crime in confidence. Confidential reports for purposes of inclusion in the annual disclosure of crime statistics can be made to any campus security authorities (the primary CSAs are identified in the Reporting and Disclosure Procedures above). However, some of the CSAs are also Responsible Employees under Title IX, and they are obligated to share reported information involving sexual misconduct, domestic/dating violence, and stalking, including information about the identity of the victim and accused, with the Title IX Coordinator. Reports to professional and pastoral counselors can be kept confidential. Professional and pastoral counselors are encouraged to inform their clients, if and when they deem it appropriate, of the procedures to confidentially report crimes to primary CSAs, when they deem it appropriate.

Pastoral and Professional Counselors

Campus "Pastoral Counselors" and "Professional Counselors," when acting as such, are not considered to be a campus security authority for Clery Act purposes and are not required to report crimes for inclusion in the annual disclosure of crime statistics. As a matter of policy, the professional counselors at Wilmington College are encouraged, if and when they deem it appropriate, to inform persons being counseled of the procedures to report crimes on a voluntary confidential basis to Campus Safety.

Pastoral Counselor

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

Professional Counselor

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

It is well known that many acts of violence, including sexual abuse situations, occur when one or more of those involved have abused alcohol or other drugs and are under their influence. The possession and use of alcohol is prohibited in residence halls and public/common areas on campus. Caution is urged when one is in a setting where alcohol is present and those who do consume alcohol are reminded that they are expected to do so in a responsible manner consistent with the law.

Students receive educational information about alcohol through orientation for new students, programs in residence halls, and other special events conducted on campus.

Campus Safety

Campus Safety officers can detain suspects until police arrival but have no power of arrest.

Campus Safety Officers have the authority to enforce College policies.

The patrol jurisdiction of Campus Safety officers is limited to any buildings or properties owned or controlled by Wilmington College.

The Campus Safety maintains a strong working relationship with state and local police agencies, including the Clinton County Sheriff's Office and the City of Wilmington Police Department.

There are no written agreements or memorandums of understanding regarding any topics, including the investigation of criminal incidents, between Wilmington College and the Wilmington Police Department.

Campus Security Procedures, Practices and Prevention of Crimes

From time to time, Campus Safety officers visit residence halls to talk with students about security procedures and concerns and to encourage crime prevention. Students and employees are regularly encouraged to be responsible for their own security and that of others.

Everyone should be aware that the College gives timely notice to the community when certain types of crimes are reported to campus authorities or local police agencies if such crimes are considered a threat to students and employees.

These notices should be heeded, for, in practice, such a notice would be infrequent and should command special attention. Notice is made through the campus email system and by posting notices at strategic locations on campus.

One of the essential ingredients of any successful crime prevention program is an informed public. It is the intent of the Wilmington College to inform students of good crime prevention and security awareness practices.

During the 2024–2025 academic year, Wilmington College offered approximately 7 crime prevention and security awareness programs. Topics such as personal safety, residence hall security, drug and alcohol abuse awareness and sexual assault prevention are some examples of programs offered during the prior academic year.

Emergency Notification System (ENS)

The Office of Human Resources maintains an Emergency Response Plan that outlines responsibilities of campus units during emergencies. This plan outlines incident priorities, campus organization and specific responsibilities of particular units or positions.

College units are responsible for developing emergency response and continuity of operations plans for their areas and staff. Campus emergency management provides resources and guidance for the development of these plans. Emergencies occurring on campus should be reported to Campus Safety at 937–382–0100.

Our emergency notification system can send notifications instantly and simultaneously to all registered mobile phones and email addresses provided. All members of the Wilmington campus community (students, faculty, and staff) are automatically enrolled in RAVE, the emergency text and voice messaging.

The Campus Safety staff is responsible for responding to reported emergencies and confirming the existence of an emergency, sometimes in conjunction with campus administrators, local first responders and/or the national weather center.

In the event of an emergency, Wilmington College will initiate and provide, without delay, immediate notifications to the appropriate segment(s) of the College community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students, employee, and visitors.

These messages are sent as text messages to cell phones and any applicable charges from your carrier will apply. If any these systems fail or the College deems it appropriate, in person communication may be used to communicate an emergency.

The College will, without delay, and considering the safety of the community determines the content of the communication and initiate the emergency alert system unless the notification will, in the professional judgment of responsible authorities, comprise efforts to assist victims or to contain, respond to or otherwise mitigate the emergency. The administrators responsible for alerting the community are members of the Safety and Emergency Response Committee, which consists of Vice President for Business and Finance, Vice President for Student Affairs/Dean of Students/ Dean of Faculty, Director of Physical Plan, Campus Safety Lead Officer, Director of Public Relations, Assistant Dean for

Housing, one faculty member, and one student. . This group will confer to determine if a notification should be sent.

System to use	Primary Message Creator	Backup Message Creator	Authority for approving	Primary Message Sender/ Distributor	Backup Message Sender/ Distributor
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			& sending messages		
College Telephone Numbers	Spencer Izor	George Dimidik	X	Spencer Izor	George Dimidik
Mobile Telephone Numbers	Spencer Izor	George Dimidik	X	Spencer Izor	George Dimidik
Email	Spencer Izor	George Dimidik	X	Spencer Izor	George Dimidik
SMS Text	Spencer Izor	George Dimidik	X	Spencer Izor	George Dimidik

The Safety and Emergency Response Committee will collaborate to determine the content of the message and will use some or all of the systems described below to communicate the threat to the Wilmington College Community or to the appropriate segment of the community, if the threat is limited to a particular building or segment of the population.

The content of the message will vary depending on the situation. At a minimum, the messages will describe the emergency, provide basic instructions to the community, and will direct them to where they can receive additional information.

Follow-up information will be distributed using some or all of the identified communication systems (except fire alarm):

- The local news media may be utilized to disseminate emergency information to members of the larger community, including neighbors, parents, and other interested parties. The larger community can also access emergency information via the Wilmington College homepage and/or social media.
- If there is an immediate threat to the health or safety of students or employees occurring on campus, an institution must follow its emergency notification procedures. An institution that follows its emergency notification procedures is not required to issue a timely warning based on the same

circumstances; however, the institution must provide adequate follow-up information to the community as needed. *Please note that the emergency notification will be tested at least once each semester.

Any member of the community who has concerns regarding campus safety should report those concerns to Campus Safety at 578 Withrow Circle, at 937-382-0100, or the Vice President of IT & Operations, George Dimidik at 937-481-2543 Robinson Communication Center (RCC) Room 102, or Spencer Izor, Associate Vice President of Compliance at 937-481-2365 at 306A College Hall.

In conjunction with other emergency agencies, the College conducts emergency response drills and exercises each year, such as tabletop exercises, field exercises, and tests of the emergency notification systems on campus. These tests, which may be announced or unannounced, are designed to assess and evaluate the emergency plans and capabilities of the institution.

Each test is documented and includes a description of the exercise, the date and time of the exercise, and whether it was announced or unannounced.

The campus publicizes a summary of the emergency response and evacuation procedures via email at least once each year in conjunction with a test (exercise and drill) that meets all of the requirements of the Higher Education Opportunity Act.

Emergency Evacuation Procedures

The emergency evacuation procedures are tested at least twice each year. Students and employees learn the locations of the emergency exits in the buildings and are provided guidance about the direction they should travel when exiting each facility for a short-term building evacuation. The Campus Safety does not tell building occupants in advance about the designated locations for long-term evacuations because those decisions are affected by time of day, location of the building being evacuated, the availability of the various designated emergency gathering locations on campus, and other factors such as the location and nature of the threat. In both cases, Campus Safety staff on the scene will communicate information to students regarding the developing situation or any evacuation status changes.

The purpose of evacuation drills is to prepare building occupants for an organized evacuation in case of a fire or other emergency. At Wilmington College evacuation drills are used as a way to educate and train occupants on fire safety issues specific to their building. During the drill, occupants 'practice' drill procedures and familiarize themselves with the location of exits and the sound of the fire alarm.

General Evacuation Procedures

At the sound of a fire alarm or if you are instructed to evacuate, leave your work area immediately and proceed to the nearest exit, and leave the building. If you are the first to recognize a fire situation, activate the alarm, evacuate to a safe location using the nearest exit, and notify Campus Safety (937-382-0100), Police or in the event of an emergency dial 911.

1. Remain Calm
2. Do NOT use Elevators, Use the Stairs.
3. Assist the physically impaired. If he/she unable to exit without using an elevator, secure a safe location near a stairwell, and immediately inform Campus Safety or the responding Fire Dept. of the individual's location.
4. Proceed to a clear area at least 150 feet from the building. Keep all walkways clear for emergency vehicles.
5. Make sure all personnel are out of the building.
6. Do not re-enter the building.

Shelter-in-Place Procedures –What it Means to “Shelter-in-Place.”

If an incident occurs and the buildings or areas around you become unstable, or if the air outdoors becomes dangerous due to toxic or irritating substances, it is usually safer to stay indoors, because leaving the area may expose you to that danger. Thus, to “shelter-in-place” means to make a shelter of the building that you are in, and with a few adjustments this location can be made even safer and more comfortable until it is safe to go outside.

Basic “Shelter-in-Place” Guidance

If an incident occurs and the building you are in is not damaged, stay inside in an interior room until you are told it is safe to come out. If your building is damaged,

take your personal belonging (purse, wallet, access card, etc.) and follow the evacuation procedures for your building (close your door, proceed to the nearest exit, and use the stairs instead of the elevators). Once you have evacuated, seek shelter at the nearest College building quickly. If police or fire department personnel are on the scene, follow their directions.

How You Will Know to "Shelter-in-Place"

A shelter-in-place notification may come from several sources, Campus Safety, Housing Staff members, other College employees, Wilmington Police Department, or other authorities utilizing the College's emergency communications tools.

How to "Shelter-in-Place"

No matter where you are, the basic steps of shelter-in-place will generally remain the same. Should the need ever arise, follow these steps, unless instructed otherwise by local emergency personnel:

1. If you are inside, stay where you are. Collect any emergency shelter-in-place supplies and a telephone to be used in case of emergency. If you are outdoors, proceed into the closest building quickly or follow instructions from emergency personnel on the scene.
2. Locate a room to shelter inside. It should be:
 - An interior room;
 - Above ground level; and
 - Without windows or with the least number of windows. If there is a large group of people inside a particular building, several rooms maybe necessary.
3. Shut and lock all windows (tighter seal) and close exterior doors.
4. Turn off air conditioners, heaters, and fans.
5. Close vents to ventilation systems as you are able. (College staff will turn off the ventilation as quickly as possible.)
6. Make a list of the people with you and ask someone (hall staff, faculty, or other staff) to call the list in to Campus Safety so they know where you are sheltering. If only students are present, one of the students should call in the list.
7. Turn on a radio or TV and listen for further instructions.
8. Make yourself comfortable.

Timely Warnings

In the event a crime is reported within the WILMINGTON COLLEGE Clery Geography (On Campus, Public Property and Non-campus property), that, in the judgment of the Associate Vice President of Compliance, or designee, constitutes a serious or continuing threat, a campus wide "timely warning" notice will be issued.

Timely Warnings are typically issued for the following Uniform Crime Reporting Program (UCR)/National Incident Based Reporting System (NIBRS) crime classifications:

- Murder/Non-Negligent Manslaughter
- A string of Burglaries or Motor Vehicle Thefts that occur in reasonably close proximity to one another;
- Aggravated Assault (cases involving assaults among known parties, such as two roommates fighting which results in an aggravated injury, will be evaluated on a case-by-case basis to determine if the individual is believed to be an ongoing threat to the larger Wilmington College community)
- Robbery involving force or violence (cases including pick pocketing and purse snatching will typically not result in the issuance of a Timely Warning Notice, but will be assessed on a case-by-case basis)
- Sexual Assault (considered on a case-by-case basis depending on the facts of the case, when and where the incident occurred, when it was reported, and the amount information known by the Associate Vice President of Compliance, or designee). In cases involving sexual assault, they are often reported long after the incident occurred, thus there is no ability to distribute a "timely" warning notice to the community. All cases of sexual assault, including stranger and non-stranger/acquaintance cases, will be assessed for potential issuance of a Timely Warning Notice.
- Major incidents of Arson
- Other Clery crimes as determined necessary by the Associate Vice President of Compliance, or his or her designee in his or her absence.

Timely Warning Notices will be distributed as soon as pertinent information is available, in a manner that withholds the names of victims as confidential, and with the goal of aiding in the prevention of similar occurrences.

Timely Warning Notices are typically written and distributed by the Associate Vice President of Compliance, or designee.

Timely Warning Notices will be issued to the campus community via email blast to all Wilmington College assigned email accounts. Timely warnings may also be issued using some or all of the following methods of communication: text messages or emails sent through the College's Quaker AWARE system, or building postings by Building Administrators.

The institution is not required to issue a Timely Warning with respect to crimes reported to a pastoral or professional counselor.

Monitoring and Recording of Criminal Activity by Students at Non-campus locations of Recognized Student Organizations

Wilmington College has officially recognized student organizations that own or control housing facilities outside of the WILMINGTON COLLEGE core campus. If the Wilmington Police Department is called by a citizen to respond to one of those locations, Wilmington Police Department will typically notify Campus Safety to respond with them or they will notify Campus Safety after they have responded to inform WILMINGTON COLLEGE of the situation. However, Wilmington Police Department does this out of courtesy and is not "required" to notify or involve Campus Safety when they respond to a call involving private property.

(HEOA) Notification to Victims of Crimes of Violence

The College will, upon written request, disclose to the alleged victim of a crime of violence, or a non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by such institution against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased as the result of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of this paragraph.

Sex Offender Registration

The federal Campus Sex Crimes Prevention Act, enacted on October 28, 2000, requires institutions of higher education to issue a statement advising the campus community where law enforcement agency information provided by a State concerning registered sex offenders may be obtained. It also requires sex offenders already required to register in a State to provide notice, as required under State law, of each institution of higher education in that State at which the person is employed, carries on a vocation, volunteers services or is a student.

In Ohio, convicted sex offenders must register with the county sheriff's office where they reside, work, or attend school. You can link to this information for Clinton County, which appears on <https://clintonsheriff.com/public-services/sex-offenders/> website, or by accessing Wilmington's Campus Safety at <https://www.wilmington.edu/student-life/campus-safety>.

*Annual Safety Data – 2024

Campus Crime Statistics Wilmington College compiles this data for its annual report as required by the Campus Security Act in accordance with definitions used in the FBI's Uniform Crime Reporting Program (UCR). The College must publish statistics on the following criminal and hate offenses that were reported to campus authorities during the periods indicated:

*This data will be updated and redistributed upon further review

Crime Categories	On Campus			Residence Halls			Public Property			Non-campus		
	2024	2023	2022	2024	2023	2022	2024	2023	2022	2024	2023	2022
<i>Criminal Offenses</i>												
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
Robbery	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	1
Burglary	0	1	1	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	2	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0	1	0	0
Larceny-Theft	1	0	0	0	0	0	0	0	0	3	0	0
Intimidation	0	0	0	0	0	0	0	0	0	0	0	0
Destruction/Damage/Vandalism	3	1	0	0	1	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0	0	0	0
<i>Sex Offenses</i>												

Rape	1	1	1	0	1	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	1	0	0	0	0
Incest	0	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	0
<i>VAWA Offenses</i>													
Domestic Violence	0	0	0	0	0	0	0	0	1	0	0	0	0
Dating Violence	0	0	0	0	0	0	0	0	0	0	0	0	0
Stalking	0	1	1	0	0	1	0	0	0	0	0	0	0
<i>Arrests</i>													
Weapons: Carrying, Possessing, etc.	0	0	0	0	0	0	0	0	0	0	2	3	0
Drug Abuse Violations	0	0	1	0	0	0	0	0	0	0	0	0	0
Liquor Law Violations	0	0	0	0	0	0	0	0	0	0	0	0	0
<i>Disciplinary Actions</i>													
Weapons: Carrying, Possessing, etc.	2	0	0	0	0	0	1	0	0	0	0	0	0
Drug Abuse Violations	7	25	4		21	4	0	0	0	0	4	0	0
Liquor Law Violations	10	40	57		36	57	0	0	0	0	4	0	0
<i>Unfounded Crimes</i>													

Hate Crimes

Hate crimes include any of the crimes listed in the table above, any other crime involving bodily injury, and any crime of theft, simple assault, intimidation, and destruction/damage/vandalism of property, reported to Campus Safety, a local law enforcement agency, or a Campus Security Authority, that manifests evidence that the victim was selected because of the perpetrator's bias.

Categories of bias include race, religion, gender, gender identity, sexual orientation, ethnicity/national origin, and disability.

2022: No hate crimes were reported

2023: No hate crimes were reported

2024: No hate crimes were reported.

Unfounded Crimes

Unfounded crimes are those crimes reported that were found not to have occurred or were never attempted. The determination to unfound a crime can only be made by sworn or commissioned law enforcement personnel. An example of an unfounded crime would be an owner reporting a stolen car that officer later learned had been towed rather than stolen.

2022: No unfounded crimes

2023: No unfounded crimes

2024: No unfounded crimes

Daily Crime Log

Campus Safety maintains a Daily Crime Log which is available to the public for review, at the Campus Safety Office in the Center for Service and Civic Engagement House, 578 Withrow Circle, 24 hours. Monday through Friday, excluding holidays.

Annual Fire Safety Date – 2024

This report is published by Wilmington College in compliance with the Higher Education Opportunity Act and applies to student housing at the College.

Fire Safety Equipment and Statistics for On Campus Housing

Fire safety equipment is to be used only for the purpose for which it was designed. Misuse of or damage to fire safety equipment (i.e., fire alarms, fire extinguishers, smoke detectors, emergency exit doors and alarms, etc.) or failure to leave a building during a fire alarm or a fire drill will be considered a serious matter which will result in disciplinary action and possible legal action.

Damaging, disassembling, or removing the battery from a smoke detector will result in an automatic \$25.00 fine and possible disciplinary action. The resident is responsible for testing the smoke detector in their living space and reporting

malfunction to the Housing staff in writing. Setting off a false fire alarm or using a fire extinguisher for other reasons than to put out a fire endangers the lives of all occupants of a building.

Persons committing such acts will be sanctioned to the full extent of the Student Code of Conduct and may be subject to legal action, including prosecution by off-campus authorities. All storage in a non-sprinkler facility should remain 24" from the ceiling. No items are permitted to hang from the ceiling.

Decorative items may not be strung throughout the hallway without permission from the Director of Housing and Residence Life. Any permitted items must be removed within the time limit specified by the Director of Housing and Residence Life. Every building is equipped with a fire alarm system and smoke detectors are in every room. According to the Building Officials and Ohio Fire Code; 307.1: Open flames, such as candles, are not permitted in residence halls, College-owned houses, and apartments. Candles are allowed on campus, but the wicks must be clipped or removed to prevent them from being lit. Incense and incense burners are not allowed in residential facilities. Plug-in deodorizers (and other similar products) are prohibited due to the residue they leave on smoke detectors and other alarm equipment that cause false alarms.

Some types of electrical appliances are allowed in student rooms; others are either prohibited or restricted in some way. There are several reasons for these restrictions. Some appliances are hazardous, some are unsightly, and some use an extreme amount of electricity. The electrical appliances that are prohibited or have restrictions placed on them in the residence halls are listed below. If a room is having electrical problems, some appliances will have to be removed to prevent further overloading. The only cooking appliances allowed in residence hall rooms are single-pot coffeemakers, Keurig's, etc.

Holiday light strands are not allowed as wall decorations due to damages that result. Space heaters are not allowed in student rooms. If your room does not get adequate heat the Physical Plant Department should be contacted to make adjustments. Receptacles containing combustible fuel are not allowed in any housing facility at any time. Hot plates, multiple-pot coffee pots, pottery water-warmers, immersion coils, halogen bulb lamps, plug-in air fresheners, scented oil

heaters, lava lamps, electric skillets, toasters, toaster ovens, microwave ovens, and large appliances are not allowed in student rooms. Cooking grills and firepits are prohibited outside of designated areas on campus. Storage of grills and firepits are prohibited in residential communities. In accordance with Ohio Fire Code only surge-protected power strips may be used for extension cords. Surge-protected UL-listed power strips must be plugged directly into a wall outlet. Refrigerators must be plugged directly into a wall outlet. Refrigerators larger than 4.6 cubic feet in capacity and requiring starting amperage of more than three amps are not allowed. During each semester break period, refrigerators must be cleaned out and unplugged. Only one refrigerator per room is allowed to prevent electrical overload.

Microfridges (i.e., combination microwave/refrigerator) are prohibited. Sunlamps are prohibited; please contact the Director of Housing if a medical need necessitates the use of a sunlamp.

If the fire alarm should ring, everyone must vacate the area immediately according to the hall fire evacuation plan. No one may re-enter the building without the authorization of the Housing staff, Campus Safety, or the Fire Department. Once safely outside a building, it is appropriate to contact 911 and the Campus Safety. Students and/or staff are informed where to relocate to by staff if circumstance warrants at the time of the alarm. In the event fire alarms sound, College policy is that all occupants must evacuate from the building, closing doors as they leave. No training is provided to students or employees in firefighting or suppression activity as this is inherently dangerous and each community member's only duty is to exit safely and quickly, shutting doors along the exit path as they go to contain the spread of flames and smoke, and to activate the alarm as they exit. At no time should the closing of doors or the activation of the alarm delay the exit from the building.

Fire drills will be conducted once a year in every residence hall, in compliance with the Wilmington Fire Department. In addition, fire safety inspections will be conducted at least once a year by the Housing staff. The Housing staff may enter any room without prior notification to determine if a violation of fire safety policies exists. To afford residents easy egress from buildings in emergency situations, bicycles may not be kept in hallways, stairwells, or public areas inside the residence halls.

The charts below indicate the fire safety equipment in each hall as well as fire statistics for the past three calendar years. (Please see table)

Fire Incidents on Campus

<i>Residence Hall</i>	<i>Total Number of Fires in each building</i>			<i>Category and Cause of Fire</i>			<i>Deaths</i>			<i>Injuries</i>			<i>Value Damages USD</i>		
	2024	2023	2022	2024	2023	2022	2024	2023	2021	2024	2023	2022	2024	2023	2022
Austin Hall – 685 Elm Street	0	0	0	0	0	0	0	0	0	0	0	0	\$0–99	\$0–99	\$0–99
College Commons – 490 Elm Street	0	0	0	0	0	0	0	0	0	0	0	0	\$0–99	\$0–99	\$0–99
College Commons – 470 Graham Drive	0	0	0	0	0	0	0	0	0	0	0	0	\$0–99	\$0–99	\$0–99
College Commons – 468 Graham Drive	0	0	0	0	0	0	0	0	0	0	0	0	\$0–99	\$0–99	\$0–99
College Commons – 466 Graham Drive	0	0	0	0	0	0	0	0	0	0	0	0	\$0–99	\$0–99	\$0–99
College Commons – 460 Graham Drive	0	0	0	0	0	0	0	0	0	0	0	0	\$0–99	\$0–99	\$0–99
College Commons – 458 Graham Drive	0	0	0	0	0	0	0	0	0	0	0	0	\$0–99	\$0–99	\$0–99
College Commons – 456 Graham Drive	0	0	0	0	0	0	0	0	0	0	0	0	\$0–99	\$0–99	\$0–99
Denver Hall – 1700 Quaker Way	0	0	0	0	0	0	0	0	0	0	0	0	\$0–99	\$0–99	\$0–99
Friends Hall – 1800 Quaker Way	0	0		0	0	0	0	0	0	0	0	0	\$0–99	\$0–99	\$0–99
Marble – 1890 Quaker Way	0	0	0	0	0	0	0	0	0	0	0	0	\$0–99	\$0–99	\$0–99
Villages – 725 Elm Street	0	0	0	0	0	0	0	0	0	0	0	0	\$0–99	\$0–99	\$0–99

*As indicated in the Fire Statistics chart above, there were no fires in the residence halls in 2024. Please note that Bailey Hall, 764 Fife Avenue, 247 Linton Drive, and 122 Quaker Way were all repurposed from student housing. While 132 Quaker Way, 246 Linton Drive, 260 Linton Drive were demolished in 2020.

Fire Safety Inspections and Maintenance

Fire Safety Inspections are conducted quarterly by Housing and Residence Life Staff to coincide with arrival and departure of resident students. Fire systems and equipment are also inspected and serviced by Physical Plant and a fire protection system contractor, if needed. Any malfunction found is immediately scheduled for service or equipment replacement. A Fire Log and records of fire inspections and maintenance are kept in the VP, Chief Student Affairs Officer/Dean of Students Office in compliance with State and Federal regulations and are subject to inspection by Fire Safety Personnel. The Fire Safety Log can be located in the Office of Housing and Residence Life located in the Pyle Student Center, 1870 Quaker Way, Wilmington, OH 45177.

In the event of a fire, residents should dial 911 and immediately report a fire in the residence halls. If the fire is extinguished, the building should still be evacuated, and the fire reported to Campus Safety and Housing staff in order for safety inspections to be conducted.

Fire Education and Training

Professional staff and Resident Assistants are instructed in fire prevention policies, the use of fire extinguishers and evacuation procedures. Resident students are instructed by Resident Assistants and Professional staff during their first hall meeting at the College. Students are advised of the location of fire safety equipment, evacuation routes and fire prevention policies pertaining to their residence hall.

Safety Systems

<i>Residence Hall</i>	<i>Monitored</i>	<i>Smoke Detectors</i>	<i>Pull Stations</i>	<i>Sprinkler Systems</i>	<i>Fire Extinguisher</i>
Austin Hall – 685 Elm Street	X	X	X		X
College Commons – 490 Elm Street	X	X	X		X
College Commons – 470 Graham Drive	X	X	X		X
College Commons – 468 Graham Drive	X	X	X		X
College Commons – 466 Graham Drive	X	X	X		X
College Commons – 460 Graham Drive	X	X	X	X	X
College Commons – 458 Graham Drive	X	X	X		X
College Commons- 456 Graham Drive	X	X	X		X
Denver Hall – 1700 Quaker Way	X	X	X		X
Friends Hall – 1800 Quaker Way	X	X	X		X
Marble – 1890 Quaker Way	X	X	X		X
Villages – 725 Elm Street	X	X	X		X
Austin Hall – 685 Elm Street	X	X	X		X
College Commons – 490 Elm Street	X	X	X		X
College Commons – 470 Graham Drive	X	X	X		X
College Commons – 468 Graham Drive	X	X	X		X
College Commons – 466 Graham Drive	X	X	X	X	X
College Commons – 460 Graham Drive	X	X			X

Supervised Fire Drills

Fire drills are conducted once per semester in each residence hall by the Housing and Residence Life Office. Housing Staff and Resident Assistants activate fire alarm systems and evacuate buildings.

Students are required to participate and evacuate during a drill. All students are to remain outside the building until college officials allow them to return.

Evacuation Policy and Procedure

Alert other roommate(s) to the alarm.

- 1) Put on your shoes and coat. Take a wet towel.
- 2) Close your window. Leave blinds or draperies open.
- 3) Leave your room lights on.
- 4) Close the door but DO NOT LOCK IT!
- 5) Proceed calmly to the designated exit and leave the building.
- 6) Handicapped persons proceed to assigned areas.
- 7) Follow the general evacuation plan for the building.
- 8) Remain in assigned area until authorized to return to the building.
- 9) Remain calm. Do not panic or initiate panic.

Do Not

- Use the elevators during an evacuation.
- Open door if the door or door handle feels hot.
- Attempt to save personal belongings.
- Tamper with fire safety equipment.
- Remain in the building during an alarm. Specific directions may be found on wall charts located on each floor. Please acquaint yourself with the evacuation plan.

Resident Assistants will provide students with the specific exit pathways and procedures for evacuating their residence hall. All students must evacuate a residence hall in the event of a fire alarm. Residents are advised of their assembly area for such events during orientation by their Resident Assistant. Residents may not re-enter their building until they are cleared to do so by

proper authority. In the event that a building becomes uninhabitable due to any crisis, evacuated students will be temporarily relocated to another designated building.

Plans for Improvement to Fire Safety

All fire alarm systems are maintained at their present capabilities and tested in accordance with current regulations. Because improvements are planned and implemented concurrently with facility renovations the College plans for future improvements to fire safety systems as deemed necessary by the institution.