



INSTITUTIONAL POLICY AND PROTOCOL ON CAMPUS SECURITY

(Jeanne Clery Disclosure of Campus Security Policy and Campus Statistics Act or Clery Act)

Introduction

State and federal law place a responsibility on educational institutions that receive Title IV Funds to provide protection and safety to members of their academic community. Columbia Central University (CCU) promotes a safe study and work environment for our university community, for which it prohibits and condemns any act or crime related to: sexual, domestic violence, hate crimes, theft, harassment or stalking, possession of weapons, intimidation, gender identity, aggression, damage to property, escalations, crimes on manufacturing, distribution and use of drugs, use and abuse of alcohol, and threatening human life, among others.

In addition, it recognizes the right of employees, students, prospects, and the general academic community to be informed about any criminal act that occurred on campus and public property, likewise, CCU has the responsibility to collect data, disclose, and keep informed their entire community about criminal incidents that occurred in their respective campus.

To this end, CCU has adopted this institutional policy and protocol on security at the university.

Applicability

This policy and protocol apply to all the people who make up the university community: employees, students, prospects, suppliers, visitors, and contractors.

Legal Base

This policy and protocol are promulgated under Public Law 101-542, known as the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act or Clery Act. The Clery Act requires that every higher education institution publish an Annual Campus Safety Report, notify Alert Bulletins that threaten their safety, and keep a Daily Record of crimes reported to the Security Office. Public Law 113-4 Violence Against Women Reauthorization Act of 2013 (VAWA), which imposes new responsibilities on universities, such as reporting criminal incidents that arise. In turn, they are required to develop policies and procedures to address them.



Other federal and state laws, such as Law No. 54 of August 15, 1989, as amended, which establishes the public policy of the Commonwealth of Puerto Rico concerning domestic violence; Act No. 100 of June 30, 1959, as amended, which protects employed persons and applicants for employment against discrimination based on sex, among other reasons. These laws apply to government agencies that function as businesses or private companies, Act No. 69 of July 6, 1985, as amended, requires strict compliance with equal employment rights, both for men and women, and prohibits discrimination based on sex and Megan Law (1996) that requires institutions to inform the community where to obtain information on the Sex Offender Registry, among others.

Annual Disclosure on Statistics Occurring at the University

The university is required to implement policies related to campus security and to release crime statistics annually to active students and employees, prospective students and employees, and the Federal Department of Education. Currently, such disclosure is made through email, bulletin boards, and the university's website www.columbiacentral.edu, in addition to delivering a printed copy if required.

The incidents to report according to the law, are the following:

- Murders/Non-negligent homicide
- Wrongful death
- Forced sexual assault
- Unforced Sexual Assault
- Theft
- Theft/illegal appropriation
- Escalation
- Vandalism
- Motor Vehicle Theft
- Aggravated assault
- Simple Assault
- Intimidation
- Intentional Fire
- Domestic or spouse partner violence
- Dating violence
- Stalking
- Illegal possession of weapons
- Violation of controlled substances law
- Violation of the Alcohol Law



If the reported crimes were hate crimes, they will be classified as follows: race, color, age, religion, ethnicity, gender, gender identity, sexual orientation, national origin, and disability.

Likewise, the University is obliged to designate the campus security authorities, among which is the Campus Safety Administrator, who will submit the data annually through the electronic system of the Federal Department of Education.

Procedure for Reporting Criminal Actions or Other Emergencies on Campus

Every employee, student, prospect, supplier, visitor, and concessionaire who is a victim or witness of any offense, criminal actions, or other emergencies within the university, must report the incident to the corresponding authorities: security officers, Chancellor, Facilities and Purchasing Director, and designated personnel at the time of the incident. The following will be considered offenses or criminal acts: the consumption of alcoholic beverages on university premises, acts of domestic violence, date rape, stalking or harassment, sexual assault, hate crimes, robbery, aggravated assault, murder or homicide, possession of weapons, simple assault, intimidation, destruction of property, and vandalism.

Process

1. Any member of the university community who witnesses a situation that presents a risk to safety, life, and/or property or is the victim of a crime that violates this policy is responsible for immediately informing the security officer on duty or the Chancellor, Facilities and Purchasing Director, or the Human Resources Director. The immediate solution of the emergency will be completed, if possible, with the resources available at the time, without putting the life and safety of the university community at risk.
2. An incident and/or accident report or written complaint will be completed to initiate the established investigation and intervention procedure. The said complaint will be referred to the corresponding institutional officials; These are the Chancellor, the Human Resources Director, or whoever is designated in their absence, depending on the situation.
3. If the offense or criminal act is related to a student, the complaint will be presented and reported to the Chancellor or his/her representative. The filing of a complaint results in the incident being investigated and the disciplinary process contained in the Student Regulations is applied.
4. If the offense or criminal act is related to an administrative employee or faculty, the complaint will be presented to the Chancellor or the Human Resources Director. Filing a complaint result in the incident being investigated and the disciplinary process contained in the Employee or Faculty Manuals applied.



5. If the offense or criminal act is related to a supplier, visitor, concessionaire, or contractor, the complaint will be presented to the Chancellor or the Facilities and Purchases Director. Filing a complaint result in the incident being investigated and the cancellation of contracts or contracted services evaluated. In the case of visitors, it could be determined not to allow entry to the facilities.
6. The assigned officer will interview the victim or person filing the complaint. You will be guided on:
 - a. the existing policy regarding the complaint investigation process.
 - b. the right to notify the police or not.
 - c. right to request a protection order.
 - d. the importance of preserving evidence and remembering characteristics to identify the alleged aggressor.
 - e. available resources regarding counseling, victim assistance, legal assistance, and other services.
 - f. accommodation alternatives in the work or study area.

It is important to establish that in the interview process the victim will not be forced to express matters of personal life that are not relevant to the intervention in the process. You must have a compelling professional reason to enter these private areas.

1. When filing a complaint, if the alleged or alleged perpetrator or offender is identified and belongs to the university community, it will be indicated in writing that a complaint has been filed and will be summoned for a separate interview. The Chancellor or the designated person will determine, according to the seriousness of the complaint, if the Complaints Committee is called or if the provisions contained in the Student Regulations apply.
2. If it is required to convene the Complaints Committee, it will interview the parties involved and witnesses through separate procedures.
3. The Committee will evaluate the standard evidence gathered in the interviews with the parties and witnesses and will determine recommendations for disciplinary action, if necessary. The result of the Committee's investigation and the actions to be taken will be reported to the parties involved in writing. The parties may appeal said determination to the Institutional Board of Directors (JDI).
4. If the complaint involves an intervention by outside agencies, the officer in charge will proceed to call the state police to initiate a formal investigation. The investigation will be in charge of the state police from the filing of the complaint in the judicial forum.
5. CCU will evaluate the decision determined by the corresponding judicial forum to determine the action to take regarding the alleged perpetrator.



6. The officers in charge of the process will write a report on the action and interventions with the victim and alleged perpetrator or offender.

Adjudicatory Procedure for Disciplinary Actions

It is our policy to apply discipline progressively and thus allow the student or employee to correct their behavior, except in cases of a harmful or criminal nature, which warrant immediate and definitive resignation or termination of studies or employment. These measures may vary according to the severity of the offense and the times in which such behavior is incurred.

When the assigned officer has determined that the offense or criminal act violates the safety of the person and property, he/she may take one of the following actions:

1. When the alleged or alleged perpetrator or offender is a student, the disciplinary action may range from a written warning to expulsion, as determined by the Student Regulations.
2. When the alleged or alleged perpetrator, offender, or offender is an employee, the disciplinary action may range from a written warning to termination or expulsion from employment as determined in the Employee Manual or Faculty Manual.
3. When the alleged or alleged perpetrator, offender, or offender is a prospective student or prospective employee, the Chancellor or the Human Resources Office may take the action to deny the application for admission or employment.
4. When the alleged or alleged perpetrator or offender is a contractor or concessionaire, the contractual relationship with the university may be terminated.
5. When the alleged or alleged perpetrator or offender is a visitor, said visitor may be prevented from entering the university.
6. If it is determined that a crime has been committed as established by state and federal laws, the case will be referred to law enforcement agencies.
7. Written reprimands and disciplinary sanctions shall be recorded in the student's disciplinary file or the employee's disciplinary file. Said warnings or sanctions will specifically indicate the nature of the offense or criminal act caused.

Confidentiality

It is important to note that all personnel who interact with the victim will consider the ethical criteria to carry out the interventions and highlight the importance of confidentiality.

The person in charge of caring for the victim will keep all information provided by the victim strictly confidential. The information expressed by or related to the victim may not be shared with



third parties without their consent, except when there is a situation that endangers their life or that of a minor or that of any other person when an order is issued, judicial or for extremely dangerous reasons. In addition, the victim will have access to the files of this intervention and to any document included in it that concerns him/her.

All agreements, protective measures, or accommodations provided to the victim will be kept confidential and only those responsible for compliance with them will be notified.

Retaliatory Action

The university does not support or encourage adverse actions to be taken against the person(s) who files a complaint related to this policy or any other policy. Taking adverse action against the complaining party constitutes retaliatory action.

When it has been determined that retaliatory conduct exists, the university will investigate such action and impose sanctions based on the disciplinary process determined in the Employee Manual, Faculty Manual, and Student Regulations, as applicable.

Campus Security Officers

CCU has private security services on the premises. The hired officers provide services related to attending, watching over, reporting situations, and enforcing the established rules and policies. The responsibility of protecting the university community, as well as property, rests with these security officers.

Recommendations for Personal Protection or Defense

Common efforts of the entire university community are required to combat crime and or violent acts. It is important to recognize that safety is everyone's responsibility.

Safety tips

1. Avoid walking alone through low-traffic areas, desolate areas, classrooms, or empty buildings.
2. Always be alert and watch closely what is happening around you.
3. Walk through illuminated places. Don't take unnecessary risks.
4. Avoid going to restrooms alone, especially during non-working hours.
5. Look over your shoulder to avoid being surprised.
6. Carry books in a bag or backpack to keep your hands free.
7. If you are mugged, do not resist if you understand that you are endangering your safety.



8. If you find yourself being followed, try to get to a security officer as soon as possible. If necessary and you can, run and drop books or backpacks that may slow your progress.
9. If you do not feel safe in an area, ask the security officer to accompany you.
10. Don't stay in the car alone for a long time.

Belongings

1. Label the objects you own with your student number.
2. Store your belongings in the trunk of your car.
3. Do not leave visible valuables, such as wallets, briefcases, packages, calculators, and cameras, among others.
4. Don't bring more money than necessary.
5. Avoid wearing expensive clothes.
6. Protect yourself by sticking purses or bags to your body.
7. If you are an employee, keep your valuables while you are on duty in a safe place.

Defense mechanisms in case of aggression or assault

1. Don't lose control.
2. Stay calm.
3. Think of resources and options.
4. Assess the situation.
5. Do not resist if the attacker is armed, it can cause death.
6. If you can, use some negotiation strategy.
7. If you can, flee to safety.
8. Be assertive.
9. Yell to attract the attention of others.
10. In the event of sexual assault, to preserve evidence it is recommended that the victim not shower or change clothes.
11. You must observe the person who commits the crime well unless under threat he instructs you otherwise.
 - a. Characteristics to observe:
 - i. Height and weight
 - ii. skin color
 - iii. face shape and eye color
 - iv. hair color, haircut, and presence of mustaches
 - v. marks, scars, or tattoos
 - vi. voice tone
 - vii. clothing



- viii. do not destroy any type of evidence

Maintenance and Security Measures in Physical Facilities to Reduce Risks to the University Community

1. Lighted areas and luminaires will be kept in good condition.
2. Shrubs and trees should be kept pruned at a prudent height within sight of people.
3. Student and employee parking areas will be identified.
4. Security officers will require identification from visitors.
5. Security officers will make preventive rounds through all areas.
6. Security officers may close areas as preventive measures.
7. All vehicles must have a visible parking stamp that identifies you as a student, faculty, or administrative employee.

Safety Awareness Program

Students

1. Speeches will be offered to students each term.
2. Information will be sent via email regarding the policy and available resources.
3. Information related to these topics will be published via email.
4. Information tables will be established to offer information regarding said topics.
5. Written notification will be provided via email to students about resources for counseling, health, mental health, victim assistance, legal assistance, and other services within the university and outside of it.

Faculty and Administration

1. Speeches will be given annually.
2. Information will be sent via email regarding the policy and available resources.
3. A written copy of the policy will be delivered, and employees will be notified that it is a condition of employment to respect the statutes of the policy.
4. Written notification will be provided regarding counseling resources, health, mental health, victim assistance, legal assistance, and other services within and outside the university.
5. Written notification will be provided to victims regarding accommodation options related to working conditions upon request.



Means to Guide and Educate the University Community

The university will guide students and employees regarding these issues through:

1. Workshops
2. Special projects
3. Booklets
4. Information tables
5. Sending communications via email
6. Website: www.columbiacentral.edu

Sex Offender Registry

Information on the Sex Offender Registry can be obtained through the following email address:
<http://prcjisweb.gobierno.pr/>

Protocols in Emergency Situations and the University or Facility Eviction Plan

CCU has a Procedures Manual to carry out the protocols in emergencies and the Eviction Plan of the facilities or university, where the university community is provided with information on the recommendations to follow in the event of an emergency in our facilities. For more information, refer to the Manual published on the website www.columbiacentral.edu.

Institutional Policy on the Illegal use and abuse of drugs, alcohol, and tobacco

CCU has a policy on the illegal use and abuse of drugs, alcohol, and tobacco. This policy provides that no member of the university community will be involved in the illegal use, possession, manufacture, distribution, or transfer of drugs within CCU facilities or educational activities outside the university and/or practice scenarios.

Additionally, alcohol consumption is prohibited inside the university. Only moderate consumption of alcoholic beverages by adults will be allowed at university-sponsored activities that take place off-campus.

For more information, refer to the policy included in the following publications: Faculty Manual, Employee Manual, Student-Consumer Manual, and institutional website.



Institutional Protocol on Domestic Violence

CCU has a written protocol for handling domestic violence situations. It provides uniformity to the measures and procedures to be followed when an employee or a student is a victim of domestic violence. An employee or student who considers himself/herself to be a victim of domestic violence will be oriented about his/her rights and available resources to effectively handle the said situation. Employees and students should be aware that practices considered domestic violence are prohibited, for which action will be taken against those who threaten the safety of others.

For more information refer to the protocol included in the following publications: Faculty Manual, Employee Manual, and Student Consumer Manual.

Timely Warnings

Security alerts should reach the entire campus. Because the nature of criminal threats is often not limited to one location, security alerts or timely warnings must be issued in a way that can reach the entire campus community. The purpose of a security alert or timely warning is to allow people to protect themselves. These alerts respond to crimes announced by designated agents of the university or local police within the geographic area of the university, as established by the Clery Act. They are considered a serious threat. Timely warnings may be updated when new and accurate information becomes available. These notifications will be issued through the alert system that includes calls, emails, and text messages.

Emergency Notifications

They are triggered by a broader potential threat: any significant emergency or dangerous situation that poses an immediate threat to the health or safety of students or employees on campus includes public property on campus that falls within your Clery Act geography. This could overlap and include a crime under the Clery Act, such as a shooting, but also covers crimes that are not required to be reported under the Clery Act as well as non-criminal incidents such as an outbreak of a contagious disease, an impending weather emergency, or a gas leak. Notifications must be issued without delay after confirmation of the emergency by the responsible authorities previously identified by the university in its annual Clery Act reports. These notifications will be issued through the alert system that includes call, email, and text messages, social networks, university websites, and media.