Webster University
2024 Annual Security Report
Vienna Campus

QUICK REFERENCE RESOURCES

Emergency Contacts

- Police 133
- Central European EMERGENCY# for Mobile Phone 112
- Fire 122
- Ambulance 144
- Local Police (Polizeiinspektion Tempelgasse) +43 1 313 10 63 37 (non-emergency
- Webster University Public Safety Office (Main campus)314-246-7430 (non-emergency)
- Sexual Offense Advocate (main campus) 314-649-8474 (24 hours a day)

The Webster University Public Safety Office is located in Webster Groves, Missouri; however, department personnel are available by phone to assist students at any of the University's international campuses locate the necessary local resources.

Webster Alert System

This is the University's free mass notification service, which is used to alert all students, faculty & staff regarding important information regarding campus crimes, emergencies and other potentially life- threatening events at their webster.edu email address. Users are strongly encouraged to add a personal email address and mobile number to their account by logging into Connections and clicking on the Webster Alerts banner.

Additional Helpful Contacts

- Webster University – Vienna Campus Reception +43 1 269 9293 0
- Vienna Student Counseling Center +43 1 269 9293 ext. 4395
- Non-Webster Emergency Psychiatric Hotline 01-313 30
- Student Resource Center +43 1 269 9293 ext. 4355
- Human Resources +43 1 269 9293 ext. 4309
- Student Affairs +43 1 269 9293 ext 4355
- Dean of Students Office (main campus) 00+1+314-968-6980
- Housing & Residential Life +43.1.269.9293 ext 4355
- Financial Aid +43 1 269 9293 ext. 4344
- Financial Aid (main campus) 00+1+314-968-6992
- Immigration/Visa Information +43 1 269 9293 ext. 4355
- Immigration/Visa Information (main campus) 00+1+314-246-7860

Table of Contents

WEBSTER UNIVERSITY 2024 ANNUAL SECURITY REPORT VIENNA CAMPUS 1

QUICK REFERENCE RESOURCES 1
Emergency Contacts 1
Webster Alert System 1

VIENNA CAMPUS CRIME STATISTICS 4
2021-2023 Crime Statistics 4
Hate Crimes 7
Unfounded Crimes 7
Webster University's Daily Crime Log 7

CAMPUS SAFETY POLICIES AND PROCEDURES 15
About Webster University's Department of Public Safety 15
Jurisdiction and Enforcement Authority of University Staff Involved in Campus Security 15
Reporting Criminal or Suspicious Activity and Emergencies 16
Contacting the University about Criminal Actions, Suspicious Activities or Emergencies 16
Confidential Reports 16
University Response to Reports of Crime or Suspicious Activity 17
Higher Education Opportunity Act Victim Notification 17
Webster Alerts Mass Notification System 17
Timely Warning Policies and Procedures 18
Updates to Timely Warnings 20
Campus Safety Advisories 20
Security Awareness & Crime Prevention Programs 20

EMERGENCY RESPONSE AND EVACUATION POLICIES AND PROCEDURES 22
Immediate Emergency Response Procedures 22
Evacuation Procedures 23
Emergency Notifications Policies & Procedures 24
Communicating Emergency Notifications to the Larger Community 26
Follow Up Information Regarding Campus Emergencies 26
Publication & Tests of Emergency Response and Evacuation Procedures 26

CAMPUS SECURITY & ACCESS CONTROL 28
Security Measures 28
Access Control 29

ALCOHOL AND DRUG POLICY & EDUCATION PROGRAMS 30
University Alcohol Policy 30
University Drug Policy 31
Drug and Alcohol-Abuse Education Programs 31

POLICIES AND PROCEDURES RELATED TO SEXUAL ASSAULT, DATING VIOLENCE, DOMESTIC VIOLENCE, AND STALKING 26
Policies on Sexual Assault, Harassment, and Other Sexual Offenses 26
Reporting Sexual Assault, Dating Violence, Domestic Violence or Stalking 28
Reports to Human Resources or the Campus Director 30
Important Information Regarding Confidentiality 30

Amnesty from University Drug and Alcohol Policy 32
University Response to Reports of Sexual Assault, Dating Violence, Domestic Violence or Stalking 32
Orders of Protection 33
Interim Protective Measures Available to Reporting Parties 33
On Campus Resources Available to Parties Reporting Sexual Assault, Dating Violence, Domestic Violence or Stalking 34
Community Resources Available to Parties Reporting Sexual Assault, Dating Violence, Domestic Violence or Stalking 35
General Information Regarding Institutional Disciplinary Proceedings Related to Reports of Sexual Assault, Dating Violence, Domestic Violence or Stalking 35
Timeframe for Disciplinary Proceedings 36
Notifications to Reporting and Responding Parties 36
Standard of Evidence 36
Sanctions 36

UNIVERSITY DISCIPLINARY PROCESSES 37
Employee Grievance Procedures (3.3) 37
Student Grievance Procedure (3.4) 40
Student Conduct Procedures (4) 43
Policy Regarding Educational Programs and Campaigns to Prevent Dating Violence Domestic Violence, Stalking and Sexual Assault 45
Bystander Intervention 45
Risk Reduction 46
Primary Prevention and Awareness Programs 46
Prevention and Awareness Campaigns 47
Sex Offender Registry 47

APPENDIX A – Clery Act Crime Definitions 48
Types of Bias reportable under the Clery Act: 50

APPENDIX B – Crime Prevention Tips 52
Tips for Securing Valuables in an Office 52
Tips for Securing Valuables in Residences 52
Personal Safety Tips 52
Preventing Thefts from Vehicles 53
Preventing Bicycle Theft 53

APPENDIX C – Applicable Austrian Law 54
Section 177 Sexual Coercion; Rape 54
Section 179 Sexual Abuse of Persons Incapable of Resisting 54
Section 176 Sexual Abuse of Children 55
Section 176a Serious Sexual Abuse of Children 55
Section 173 Sexual Intercourse between Relatives [Incest] 56

APPENDIX D – Bystander Intervention Tips 57

VIENNA CAMPUS CRIME STATISTICS

This section of the Annual Security Report explains what type of crimes institutions are directed to include under the Clery Act, as well as how the University obtains and tabulates these statistics each year.

The statistics included in the Annual Security Report are compiled by the Department of Public Safety (DPS) with assistance from a wide range of other University administrative departments, including but not limited to Campus Directors and Directors of Operation at branch campuses, Student Affairs, Housing and Residential Life, Human Resources, and Title IX. DPS collects statistics from the University's Campus Security Authorities (CSAs),[1] on an ongoing basis throughout the year and follows up with an annual request for confirmation that all reports of crimes received by CSAs have already been reported to DPS. DPS also annually requests crime statistics from local law enforcement agencies which could potentially respond to calls anywhere on this campus' reportable geography.

2021-2023 Crime Statistics

Under the Clery Act, institutions are only directed to disclose statistics for a specific list of criminal offenses, (collectively referred to as Clery Act Crimes[2]) which were reported to have occurred in certain property controlled by the institution. Specifically, institutions must publish statistics for Clery Act Crimes which occurred on or at any of following locations:

On-Campus: 1) Any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institution's educational purposes, including residence halls; or 2) any building or property that is within or reasonably contiguous to the area identified in paragraph (1) of this definition, that is owned by the institution but controlled by another person, is frequently used by students, and supports institutional purposes (such as a food or other retail vendor).

On-Campus Student Housing Facilities: any student housing facility that is owned or controlled by the institution or is located on property that is owned or controlled by the institution, and is within the reasonably contiguous geographic area that makes up the campus is considered an on-campus student housing facility. Note that this is a subcategory of the On-Campus category.

Public Property: All public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus.

Non-Campus Buildings or Property: Any building or property owned or controlled by a student organization that is officially recognized by the institution; or any building or property owned or controlled by an institution that is used in direct support of, or in relation to, the institution's educational purposes, is frequently used by students, and is not within the same reasonably contiguous geographic area of the institution. *Note that none of Webster University's officially*

[1] CSAs include members of DPS, as well as other University employees or volunteers with responsibility for campus security who are not members of DPS; and University officials with significant responsibility for student and campus activities, including but not limited to, student housing, student discipline and campus proceedings. Because official responsibilities and job titles vary significantly on campuses, CSAs are classified by job function, not job title.

[2] Definitions of the Clery Act Crimes are provided in Appendix A

recognized student organizations own or control any property.

Clery Act Crimes are grouped into four general categories.

Criminal Offenses: Criminal Homicide (including Murder and Non-negligent Manslaughter, and Manslaughter by Negligence); Sexual Assault (including Rape, Fondling, Incest and Statutory Rape); Robbery; Aggravated Assault; Burglary; Motor Vehicle Theft; and Arson.

Hate Crimes: which includes any of the Criminal Offenses and any incidents of Larceny-Theft, Simple Assault, Intimidation, or Destruction/Damage/Vandalism of Property that were motivated by bias.

VAWA Offenses: which includes any incidents of Domestic Violence, Dating Violence and Stalking. (Note that Sexual Assault is also a VAWA Offense but is included in the Criminal Offenses category for Clery Act reporting purposes.)

Arrests and Referrals for Disciplinary Action: which includes separate arrests and referral statistics for violations of weapons laws, drug abuse violations and liquor law violations.

It is also important to note:
statistics are based on reports of alleged criminal offenses – regardless of whether or not the crime has been investigated, or whether a finding of guilt or responsibility has been made; and statistics are tabulated based on the date the Clery Act Crime was reported, not the date it allegedly occurred.

CAVEATS: A response from local law enforcement advised that they did not have any detailed crime statistics for the area surrounding the Vienna campus.
Please note that while the Vienna campus does not currently have any on-campus housing, it did prior to the fall of 2018.

Criminal Offenses Reporting Table 2021-2023 (Vienna Campus):

Offense	On-Campus Property			On-campus Student Housing Facilities			Non-Campus Property			Public Property		
	2021	2022	2023	2021	2022	2023	2021	2022	2023	2021	2022	2023
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0
Manslaughter by Negligence	0	0	0	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0	0	0	0
Incest	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
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	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0

VAWA Offenses Reporting Table 2021-2023 (Vienna Campus):

Offense	On-Campus Property			On-campus Student Housing Facilities			Non-Campus Property			Public Property		
	2021	2022	2023	2021	2022	2023	2022	2023	2023	2021	2022	2023
Domestic Violence	0	0	0	0	0	0	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0	0	0	0	0	0	0
Stalking	0	0	0	0	0	0	0	0	0	0	0	0

Arrests and Disciplinary Referrals Reporting Table 2021-2023 (Vienna Campus):

Offense	On-Campus Property			On-Campus Student Housing			Non-Campus Property			Public Property		
	2021	2022	2023	2021	2022	2023	2021	2022	2023	2021	2022	2023
Arrests: Weapons: Carrying, Possessing, Etc.	0	0	0	0	0	0	0	0	0	0	0	0
Disciplinary Referrals: Weapons: Carrying, Possessing, Etc.	0	0	0	0	0	0	0	0	0	0	0	0
Arrests: Drug Abuse Violations	0	0	0	0	0	0	0	0	0	0	0	0
Disciplinary Referrals: Drug Abuse Violations	0	0	0	0	0	0	0	0	0	0	0	0
Arrests: Liquor Law Violations	0	0	0	0	0	0	0	0	0	0	0	0
Disciplinary Referrals: Liquor Law Violations	0	0	0	0	0	0	0	0	0	0	0	0

Hate Crimes

In addition to the statistics presented in the Reporting Tables on the preceding pages, institutions are required to report the statistics for hate crimes.

There were no reported Hate Crimes during 2021, 2022, or 2023.

Unfounded Crimes

Institutions are also required to disclose whether any crime reports were “unfounded” and subsequently withheld from crime statistics during each of the three most recent calendar years. A crime is considered unfounded for Clery Act purposes only if sworn or commissioned law enforcement personnel make a formal determination that the report is false or baseless.

There were no unfounded crimes in 2021, 2022, or 2023.

Webster University’s Daily Crime Log

Up to date information regarding crimes reported on Clery Act Geography is also publicly available

year-round in a Daily Crime Log maintained by the Director of Operations/Head of European Operations. The Crime Log records, by the date the incident was reported to the Head of the Operations Department certain information on all alleged criminal incidents (not just Clery Act Crimes) which occurred on Clery Act Geography. The Crime Log does not include information unrelated to

alleged crimes (e.g., responding to alarms on campus or rendering medical assistance). The most recent 60 days of the Daily Crime Log are available for public inspection at the front desk of the Vienna campus Mon-Thu 8:30am- 6pm and Fridays 8:30 am-3pm., except during certain holidays and when the campus is closed.

Requests to view entries from more than 60 days ago, will be provided within two business days of the request.

CAMPUS SAFETY POLICIES AND PROCEDURES

This section of the Annual Security Report includes information about Webster University's Department of Public Safety located on the Webster Groves campus, how to report crimes or suspicious activity on this campus, and how the University communicates important safety information to the campus community.

About Webster University's Department of Public Safety

The Webster University Department of Public Safety (DPS) is led by Director Rick Gerger who has over 20 years of law enforcement experience and holds a Bachelor of Science in Administration of Justice and a Master of Arts in Business and Organizational Security Management. Director Gerger has led this department since 2015. DPS is a member of the University's Finance and Administration division, and reports to the Vice President and CFO. DPS personnel work collaboratively with local law enforcement and administrators and staff at the University's branch campuses to provide protective and safety services to the campus community. Contract security officers/porters also provide additional security at the front desk/main entrance of this campus at certain times.

Jurisdiction and Enforcement Authority of University Staff Involved in Campus Security

Local law enforcement has jurisdiction over all Webster University owned or controlled property associated with this branch campus; however, Student Affairs staff, Housing and Residential Life staff, and the Facilities Management work together with local law enforcement to enforce University policy, as well as local and federal laws. Only local law enforcement has the power to make arrests on the Webster University property associated with this campus; however, University administrators or staff may assist local law enforcement with making arrests on University property, or with any search or seizure in connection with an arrest related to a crime committed on University property.

There is no written "memorandum of understanding" (MOU) agreements between the University and any local law enforcement agencies regarding the investigation of alleged criminal offenses. However, local staff and DPS work cooperatively with local law enforcement to enhance public safety services and campus security. The University has a number of recognized student organizations, however, none of these organizations own or control any on campus or non-campus buildings or structures.

Facilities Management personnel have primary responsibility for the day-to-day campus security for all of the facilities on campus, but this department also works collaboratively with local law enforcement and an outside security firm. Contract security officers/porters employed by the outside firm, G4S Security provided additional security at the front desk/main entrance of the academic building during specific afternoon and evening hours when the front desk is not staffed by Facilities personnel.

Facilities Management personnel are also responsible for opening the campus each day and securing it each night. The Director of Operations, Campus Director, Facilities Management staff,

and contract security officers/porters work closely with administrative departments throughout this campus on a dual approach to campus security – which entails both minimizing criminal opportunities whenever

possible, and encouraging members of the campus community to take an active role in their own personal safety and the safety of others.

Reporting Criminal or Suspicious Activity and Emergencies

The University strongly encourages all members of the campus community (as well as visitors) to promptly and accurately report any criminal or suspicious activity and emergencies as outlined below as soon as possible, even if the victim of a crime elects to, or is unable to, make such a report. It is essential that all crimes are reported to using these methods so that the Director of Operations can determine whether a Timely Warning3[3] needs to be issued to the campus community and consider whether the incident should be included in the annual crime statistics and/or the Daily Crime Log.

Contacting the University about Criminal Actions, Suspicious Activities or Emergencies

Campus community members should report criminal action, suspicious activity or other emergencies occurring on campus, in off campus housing leased through the University, or on other property owned or controlled by the University to the Facilities & Operations Front Desk by dialing +43 1 2699 293 4300 (or dial 4300 from any IP phone on campus). Front desk hours may vary by day. If a reporting party cannot reach any of the contacts listed above, and the activity is an emergency situation, reporting parties should leave a brief voice message, and immediately contact local law enforcement/first responders by calling 133 (police), 144 (ambulance)or 122 (fire).

The University also strongly encourages individuals to report any crimes which occur off campus, on or in property that is not controlled by the University to the appropriate law enforcement agency. While these crimes are not included in the ASR,[4] the Director of Operations is always available to assist callers with determining which local law enforcement agency to contact for assistance.

Confidential Reports

The University understands that there are times when a victim of a crime does not want to pursue action within the university system or the criminal justice system; however reporting parties may still want to consider making a confidential report. With a reporting party's permission, any of the contacts listed above file a report without revealing the reporting party's identity. The purpose of a confidential report is to comply with a reporting party's desire to keep the matter confidential,

[3] Timely Warnings are Clery mandated safety alerts that are issued to the campus community under certain circumstances. The University's policies and procedures regarding Timely Warnings are explained in a later section of this Report.

[4] Unless the incident took place on reportable non-campus property as that term is defined by the Department of Education.

while allowing the University to take the necessary steps to ensure the future safety of the reporting party and campus community. Confidential reports allow the University to determine where there is a pattern of crime with regard to a particular location, method, or assailant, and assess whether a Timely Warning (described in more detail in the Timely Warning section of this document) is needed. These reports are also included in the University's annual crimes statistics.

Important note: confidential reporting to the Director of Operations is not available for reports of sexual assault, dating violence, domestic violence or stalking. As explained in later sections of the Annual Security Report, the Director of Operations must share the reporting party's identity with Human Resources or the Campus Director anytime he or she receives a report involving one of those crimes. See the section of the Report titled "Reporting Sexual Assault, Dating Violence, Domestic Violence or Stalking" for additional detail on how to report these types of offenses confidentially.

The University communicates annually with employees working as licensed pastoral or professional counselors regarding the procedures for Confidential Reporting described above, and asks these counselors to inform their clients about confidential reporting as they deem appropriate. However, statistics included in the Annual Security Report never include any identifying information for any of the involved parties, regardless of whether or not the crime was reported confidentially.

University Response to Reports of Crime or Suspicious Activity

Regardless of whether an incident is reported to the Front Desk, the Housing Director, the Head of Student Resource Center, the individual receiving the report will relay that information to the Director of Operations (or designee) who will ensure that DPS at the main campus is aware of the report, and work with DPS (if appropriate) to document the incident.[5] If the reporting party requests the involvement of the local law enforcement, the Director of Operations can assist reporting parties with this request. Reporting parties should be aware that reports (and any associated investigation) involving students may be referred to the Student Resource Center, Housing and Residential Life, for review and possible disciplinary referral depending on the nature of the report.

Likewise, reports involving employees/faculty members may be forwarded to Human Resources for review and possible disciplinary referral.

Higher Education Opportunity Act Victim Notification

It is University policy to, 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 the institution against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased as a result of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of this paragraph.
party.

Webster Alerts Mass Notification System

Webster University's Webster Alerts system is powered by Rave Alert™, a global leader in higher

[5] The type of response will take into consideration the nature of the report and location of the reporting party

education emergency notification. Webster Alerts are used to notify the campus community about certain crimes and emergencies as described more fully below in the following sections of the Annual Security Report related to Timely Warnings and Emergency Notifications. The University may also use Webster Alerts to communicate unexpected school closures due to inclement weather or power outages from time to time; however, it is never used to send information regarding advertising or campus activities.
Rave Guardian is another safety and security measure to keep students and staff safe. Rave Guardian Safety App keeps students connected directly with Public Safety, receiving campus notification, and giving access to resources for safety on campus.

Students, faculty and staff are automatically enrolled in the Webster Alerts system; however, their account initially only lists their webster.edu email address, and they are only signed up to receive alerts for the campus(es) they attend classes at or are employed at. Students, faculty and staff cannot opt out of receiving communications at their webster.edu email address related to certain crimes or emergencies which may affect their campus(es).

The University strongly encourages students, faculty and staff to also add additional contact information such as personal email addresses and mobile numbers to their Webster Alerts account. Individuals are provided an opportunity to add up to three personal email addresses and three mobile numbers to their account. This also allows account holders to add other individuals such as parents or guardians to their account if they wish. Other individuals who are interested in signing up for a Webster Alerts account can request an account by contacting the Sr Director of Public Safety, Emergency Management & Facilities, Rick Gerger at 314-246-8708 or rickgerger06@webster.edu. Instructions for accessing Webster Alerts accounts is provided in new student, faculty and staff orientation materials. Account holders can always edit their current contact information and campus preferences at any time simply by logging onto Connections and clicking on the Webster Alerts banner.

Timely Warning Policies and Procedures

What Are Timely Warnings?

It is the University's policy to issue Timely Warnings to the campus community any time a campus security authority (or local law enforcement agency) receives a report of a Clery Act crime that has occurred on Clery Act geography that, in the judgment of the Director of Operations (or his/her designee)[6], constitutes a serious or continuing threat to students, faculty or employees. The University's Timely Warnings are known as "Campus Safety Alerts," and these Alerts 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 crimes.

When Are Timely Warnings Issued?

The Director of Operations evaluates each crime reported to him by the Front Desk, the Housing Director, the Head of Student Resource Center, or another CSA at this campus on a case by case basis to determine whether, based on the facts known at that time, there is an ongoing threat to the

[6] Note that any of the Campus Director's responsibilities outlined anywhere in the "Timely Warning Policies and Procedures" section of this Report may also be fulfilled by a designee of the Director's choosing.

campus community. Factors taken into consideration include but are not limited to: the nature of the crime and the continuing danger to the campus community. Campus Safety Alerts are typically issued for the following Uniform Crime Reporting Program (UCR)/National Incident Based Reporting System (NIBRS) crime classifications:

- Murder/Non-Negligent Manslaughter;
- 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 campus 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);
- A string of Burglaries or Motor Vehicle Thefts that occur in a reasonably close proximity to one another.
- 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 Director of Operations) – 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; however, 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 Act Crimes as determined necessary by the Director of Operations.

What Is Included in a Timely Warning?

Once the Director of Operations determines that a Campus Safety Alert should be issued to the campus community, he or she will draft the content of the Alert. The Director of Operations has primary responsibility for developing the content of the Campus Safety Alert; however, the Director of Public Safety (or designee) or Chief Communications Officer (or designee) at the Webster Groves campus are also authorized to draft Alerts if necessary.

The content of Campus Safety Alerts varies depending on what information is known at the time and the type of offense involved; however, the following information (if known) is typically including unless it could potentially compromise law enforcement efforts or victim confidentiality:

- Date/time/location of the crime;
- Brief description of the crime;
- Suspect description(s);
- local law enforcement contact information;
- Relevant crime prevention or safety tips.

How Are Timely Warnings Issued?

Campus Safety Alerts are always communicated via blast emails to all email addresses associated with this campus which are registered with Webster Alerts. This will always include every student, faculty, and staff member's webster.edu email address, as well as any additional email addresses which these individuals have added to their Webster Alerts accounts. The University may also

choose, on a case by case basis, to supplement the primary methods of issuing Campus Safety Alerts with one or more of the following additional methods of communications: text messages to mobile numbers registered with the Webster Alerts system associated with this campus, posting information to the University's official social media pages, posting information to the University's official website, or posting paper flyers in strategic locations on campus.

The Director of Operations has primary responsibility for issuing the Campus Safety Alerts to the campus community using the methods described above; however, the Director of Public Safety (or designee) or Chief Communications Officer (or designee) at the Webster Groves campus are also authorized to issue Alerts via any of these methods if necessary.

Updates to Timely Warnings

In the event that the Director of Operations determines that an update to the original Campus Safety Alert should be issued, the update will be prepared and issued using the same procedures and methods as the initial Campus Safety Alert.

Campus Safety Advisories

While the Clery Act does not require universities to issue Timely Warnings for non-Clery Act Crimes or crimes which do not occur on Clery Act Geography; the Director of Operations may choose from time to time to issue notices to the campus community of other types of crimes or crimes which occur nearby the University but outside its Clery Act Geography. These notices are known as "Campus Safety Advisories" and they may be issued in a variety of ways to all or a portion of the members of the campus community. The Director of Public Safety (or designee) may from time to time assist the Director of Operations in communicating these voluntary Advisories to the appropriate members of the campus community at times.

Security Awareness & Crime Prevention Programs

Education is another key component of maintaining a secure campus. This campus provides security awareness and crime prevention programming in connection with each new student orientation. Security awareness and crime prevention topics are also incorporated into the new employee onboarding process.

Many of this campus' current crime prevention and security awareness programs were developed and presented by Student Resource Center and Housing staff as well as trained student volunteers under staff supervision at new student orientation which takes place five times per year. Campus administrators and staff also plan to work more closely with Public Safety staff at the main campus in Webster Groves, Missouri during this upcoming year to develop additional programming which will be communicating through information tabling at larger events to provide campus community members with an opportunity to ask questions or request additional resources. This campus is also looking into ways to incorporate crime prevention information into existing or new campus newsletters and other similar methods of communication.

The following topics were addressed in one or more of the safety awareness and crime prevention programs covered during orientation day for new students and new employees:

- The importance of providing emergency contacts

- The importance of securing personal belongings through the use of available lockers
- The University Student Conduct policy sections related to criminal conduct

Regardless of the specific focus of the programs, the presentations emphasized the need for participants to be responsible for their own security and safety, as campus safety requires collaboration between the University, students, faculty and staff.

Additional crime prevention, security awareness programs and resources (including Active Shooter training) are also available to interested individuals and groups of students, parents, staff and faculty by request. **See Appendix A for a list of Crime Prevention Tips.**

EMERGENCY RESPONSE AND EVACUATION POLICIES AND PROCEDURES

The University understands that taking proactive steps regarding emergency planning is an important step in maintaining a safe campus. This section of the Annual Security Report addresses the University's emergency response and evacuation policies and procedures and explains how the University communicates information about emergencies or dangerous situations on campus to the campus community.

Immediate Emergency Response Procedures

Broadly speaking, the University's Emergency Operations Plan (EOP) establishes policies, procedures and organizational structures and roles essential for Webster University to respond to, and recover from, crisis and emergency situations that threaten lives, property, public health and the safety of faculty, staff, students and visitors in any location controlled, leased, or owned by Webster University. DPS leads the University's efforts to develop and implement the Plan; however, department heads, building managers on campus, and the Directors at Webster University's branch campuses are also responsible for developing emergency response plans, contingency plans and continuity of operations plans for their staff and areas of responsibility as appendices to and under the umbrella of the Plan. The Plan calls for the University to respond to crisis situations using the standards of the nationally recognized Incident Command System. DPS officers and other University personnel receive training in the Incident Command System and Responding to Crisis Incidents on campus and undergo refresher training annually. In 2016, key members of the University's EOP participated in the FEMA course, Multi-Hazard Emergency Management for Higher Education.

The University's EOP focuses on the following objectives:

- Establishing the basic organizational and operational roles and procedures to be used in the event of any emergency or crisis situation occurring within or on a campus or site controlled, leased, or owned by Webster University.

- Articulating clear command and control mechanisms that, when deployed, positions the University to secure and/or commit all appropriate resources toward minimizing the threat of the crisis and protecting lives, property, services and normal operations of the University.

- Creating a learning-centered environment that emphasizes community responsibility through an understanding of key concepts prevention, intervention, and response. By focusing on prevention, we reduce the necessity of intervention and response.

The Plan also identifies broad response measures for various types of crisis/incidents, including but not limited to: bomb threats, civil protests, explosions, fires, hazardous materials incidents, infrastructure failure, severe weather, severe weather, natural disasters, violent/criminal incidents, and terrorism.
In the event of an emergency on campus, University staff will work collaboratively with local first responders to respond to, and summon the necessary resources, to mitigate, investigate, and document the emergency or dangerous situation. Even under circumstances where the University

is not taking the lead in responding to the emergency, it is essential that University staff remain an active part of emergency response so that the Director of Operations can ensure the appropriate emergency notifications go out to the appropriate segment(s) of the campus community.

Evacuation Procedures

The University's EOP includes general evacuation guidelines; however, any time the University determines that an evacuation is necessary, the specific evacuation procedure would be affected by a myriad of factors, including the type of threat, the occupancy of the other buildings and areas of the campus at the time of the incident, etc. Students, faculty, staff and visitors to the campus community are expected to follow the instructions of any first responders from University officials or local law enforcement agencies on the scene. These first responders may instruct you to evacuate the building you are inside of, or shelter in place. You may be instructed to shelter in place if circumstances dictate that evacuation outside the building/area is not advisable. These situations include, but are not limited to, tornados, severe weather and chemical attack.

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 your Director of Operations or local first responders.

1. Remain calm.
2. Do NOT use elevators, use the stairs.
3. Assist individuals with physical mobility issues evacuate if you can do so safely. If you are aware of an individual with mobility issues who is unable to exit without using an elevator, assist that individual with securing a safe location near a stairwell, and immediately inform first responders 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. To "shelter-in-place" simply means that you should 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.

If 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 University building quickly. If local 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, your Director of Operations, Housing & Residential Life Staff members, other University employees, or other local first responders.

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 University officials or 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:
    a. An interior room;
    b. Above ground level; and
    c. 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. (University staff will turn off the ventilation as quickly as possible.)
6. Make a list of the people with you and ask someone (Housing staff, faculty, or other staff) to call the list in to local emergency first responders 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.

Emergency Notifications Policies & Procedures

What Are Emergency Notifications?

It is the University's policy to immediately notify the campus community (in the form of an Emergency Notification) any time the Director of Operations (or his/her designee)[7] confirms that there is a significant emergency or dangerous situation which poses an immediate threat to the health or safety of students, faculty or staff occurring on the campus. The Director of Operations is also responsible for determining the appropriate segments or segments of the campus community to receive a notification based on the type of incident involved and its location.

When Are Emergency Notifications Issued?

Any time the Director of Operations is notified about a potential emergency or dangerous situation on the University's Clery Act Geography, the Director of Operations will then reach out to the appropriate University administrators, DPS personnel on the main campus, and local first responders to quickly gather enough basic information to evaluate whether the situation poses an immediate threat to the health or safety of students, faculty or staff at that time. If the Director of

[7]Note that any of the Campus Director's responsibilities outlined anywhere in the "Emergency Notification Policies and Procedures" section of this Report may also be fulfilled by a designee of the Director's choosing.

Operations confirms that there is not a significant emergency or dangerous situation which poses an immediate threat to the health or safety of students, faculty or staff at this time, the Director will continue to monitor the situation closely.

Examples of situations which would require an Emergency Notification include, but are not limited to: an active shooter on campus, serious inclement weather such as a tornado, or a serious spill of hazardous materials. Whenever there is confirmation of a significant emergency or dangerous situation as described above, Webster University will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

What Is Included in an Emergency Notification?

Once the Director of Operations determines that an Emergency Notification should be issued, the Director will draft the content of the Emergency Notification. The Director of Operations has primary responsibility for developing the content of the Emergency Notifications, however, the Director of Public Safety (or designee) and Chief Communications Officer (or designee) at the Webster Groves campus are also authorized to draft Notifications if necessary.
The content of Emergency Notifications varies depending on what information is known at the time and the type of emergency involved, however, the following information (if known) is typically included:

- The nature of the emergency;
- The action to be taken (e.g., Evacuate; Seek Storm Shelter; Shelter in Place);
- Additionally, “GO TO” and “AVOID” may be used in the event normal response procedures would place personnel at risk; and
- Where to obtain further information and/or updates on the emergency.

How Are Emergency Notifications Issued?

Emergency Notifications are always communicated via the following methods: blast emails to all addresses[8] associated with this campus which are registered with Webster Alerts; text message alerts to any mobile devices associated with this campus which are registered with Webster Alerts; broadcast announcements through all IP phones located on campus; and alerts posted on the University’s official website. [9]

The University may also choose, on a case by case basis, to supplement the primary methods of issuing Emergency Notifications with one or more of the following additional methods of communications: alerts posted to digital signage across campus; information posted on official University social media pages; and desktop alerts to any computers on campus which are connected to the University’s network.

[8] This will always include every student, faculty, and staff’s webster.edu email address, as well as any additional email addresses these individuals have added to their Webster Alerts accounts.
[9] Anytime there is an emergency notification posted to the University’s website it will appear in a banner at the top of the page at http://webster.ac.at.

The Director of Operations has primary responsibility for disseminating the Emergency Notifications in the primary and secondary methods described above; however, the Director of Public Safety (or designee) and Chief Communications Officer (or designee) at the Webster Groves campus are also authorized to disseminate Notifications via any of these methods if necessary.

Communicating Emergency Notifications to the Larger Community

The University always provides information regarding any emergency notifications to the larger community by posting information on the University website's main page (http://webster.ac.at). The University may also decide on a case by case basis to utilize its official social media accounts or provide information directly to local or national media.

Follow Up Information Regarding Campus Emergencies

The Director of Operations will stay in close contact with appropriate University administrators, DPS personnel on the Webster Groves campus and local first responders as the situation unfolds, so that the Director can determine when it is appropriate to provide follow up information to the community. Any follow up information will be provided using the same procedures and methods as the initial Emergency Notification, except fire alarms.

Publication & Tests of Emergency Response and Evacuation Procedures

The University publicizes its emergency response and evacuation procedures annually by blast email to all "webster.edu" email addresses, in conjunction with at least one test per calendar year. This same information is also publicly available year round on the DPS website at: https://webster.edu/public- safety/crisis.php Additional crisis response materials can also be found on students, faculty, and staff's Connections home page on the right hand side of the home screen of the Connections home page after you have logged into your account under the "Crisis Response" heading.

The University conducts a variety of tests of its emergency plans and evacuation policies and procedures. Tests include regularly scheduled drills, exercises, and appropriate follow-through activities, designed for assessment and evaluation of emergency plans and capabilities. These tests, which may be announced or unannounced, are designed to assess and evaluate the emergency plans and capabilities of the institution. Drills are relatively small-scale activities that are designed to focus on specific areas or specific sections of this plan which are normally developed and evaluated by internal personnel to help acquire knowledge/skills. Exercises are generally larger in scale and are formal events and are designed to be as close to "real-life"' as possible. They are typically not stopped or interrupted to make corrections except for safety concerns or real incidents that could impact the participants. The exercises have a debriefing and a critique at the conclusion. The purpose of exercises is to test the knowledge/skills of the participants.

For example, Public Safety on the Webster Groves campus works collaboratively with other departments to annually test the University's Webster Alerts systems. The University also conducts annual tabletop exercises involving a different hypothetical emergency or crisis to test its emergency response and evacuation procedures.

Administrators at this campus may also participate in tabletop exercises involving a different hypothetical emergency or crisis to test its emergency response and evacuation procedures in collaboration with local first responders or Public Safety staff at the Webster Groves main campus.

The Vienna campus holds evacuation drills at least once per calendar year.

After the conclusion of each drill or exercise conducted by the University, the Director of Operations (or his/her designee) documents: a description of the drill/exercise, the date/time of the drill/exercise, and whether it was announced or unannounced.

CAMPUS SECURITY & ACCESS CONTROL

The University understands that preventative security measures, including effective access control is a key component of maintaining a secure campus; however these measures and access controls must be assessed for each facility on a case by case basis. The following sections of the Annual Security Report addresses the general security measures, including access to both non-residential and residential facilities on campus, but is not building specific.

Security Measures

Facilities Management personnel have primary responsibility for the day to day campus security for all of the facilities on campus, but this department also works collaboratively with local law enforcement and an outside security firm. Contract security officers/porters employed by the outside firm, G4S Security provided additional security at the front desk/main entrance of the academic building during specific afternoon and evening hours when the front desk is not staffed by Facilities personnel.

Facilities Management staff opens the campus each day and secure it each night. These staff members also manage key and card swipe access to University buildings.

The University focuses on a dual approach to campus security – which entails both minimizing criminal opportunities whenever possible and encouraging members of the campus community to take an active role in their own personal safety and the safety of others. The University uses the following techniques to maximize campus safety and minimize criminal opportunities:

Preventative patrols Operations Assistants in the Facilities Management department perform building checks two times a day daily except on Sundays and on holidays when the campus is closed. The campus' outside security firm performs external security checks at least once a day on Sundays and on holidays when the campus is closed.

- **Closed circuit television** monitoring and recording is performed at all entrances of the building.
- **Restricted card access entry system** every exterior and interior door on campus including individual residences and offices.
- **Webster University maintains campus facilities and landscaping in a manner that minimizes hazardous and unsafe conditions**. Parking lots and pathways are illuminated with lighting. Members of the University community are also encouraged to report malfunctioning safety equipment or unsafe physical conditions to Facilities Management. These types of hazards are also looked for during the twice daily walkthroughs conducted by Operations Assistants.
- **The Behavioral Intervention** The Senior Student Resource Center Officer and the Director of Counseling work together to address reports of troubling behavior which could potentially lead to security concerns on campus; however, this informal behavioral intervention process is not intended to address immediate threats. This process is used to assess reports of troubling behavior by students, faculty, or staff, and implement interventions that are in the best interest of the University and the individual. Individuals can request assistance with behavioral intervention by either contacting either the Head of the Student Resource Office or Director of Counseling.

Access Control

Webster University's Vienna campus is located in the heart of one of the most beautiful cities in Europe. The campus includes well-equipped classrooms, several computer labs, a student lounge and offices.

The University's facilities are generally open to the public during normal business hours Monday through Saturday although all visitors are required to sign in at the front desk where they will be issued identification cards.

Certain spaces within buildings may be restricted by key card access even when the building itself is open to the public.

Facility Management in cooperation with the IT department is responsible for coordinating the issuance of the necessary key cards for students, faculty and staff, and authorized visitors. After-hours access to specific spaces such as offices, classrooms, studios, etc. must be approved by the appropriate faculty or staff. Once approval is granted for after-hours access, Facility Management will arrange for access for these individuals.

ALCOHOL AND DRUG POLICY & EDUCATION PROGRAMS

The University recognizes that an effective Alcohol and Drug policy and education programs are another important aspect of campus safety for students, staff and faculty. Webster University publishes information regarding the University '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 University 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 WU students and employees. The University's full Drug and Alcohol Policy is available at: https://www.webster.edu/student-handbook/index.php Select portions of the University's Drug and Alcohol Policy and the associated education programs are explained in this section of the Annual Security Report.

University Alcohol Policy

The University expects its students to observe all federal, state and local laws, including those related to the possession, use, sale and consumption of alcoholic beverages. Campus administration works collaboratively with the Dean of Students Office and other personnel at the main campus in Webster Groves, Missouri to enforce these laws, and maintain standards governing the allowable use of alcohol on campus and at campus events, and in on campus student housing facilities.

When on campus, students who are 18 years of age or older[10] may consume alcoholic beverages only at University sanctioned events. Students living in off-campus housing arranged by the University may only consume alcoholic beverages in accordance with the Housing and Residential Life policy described below. The University prohibits drinking games on campus, whether at events or in off-campus residential facilities. While off-campus, students are expected to uphold the policies of the Student Code of Conduct. Behavior occurring off-campus that is that is detrimental to the University or members of the campus community is governed by this Code. Webster reserves the right to take actions that address the violations through educational intervention or sanctions.

The following only applies to the Housing and Residential Life [11] Department's alcohol policy which states that individuals who are of legal age to possess and consume alcohol may have alcohol in their assigned residential space for personal consumption. Alcohol may only be consumed by individuals of legal age, 18 years of age or older. Individuals who are not 18 years of age or older may not possess or consume alcohol. With the exception of a roommate, alcohol may not be in the presence of individuals under 18 years of age. Individuals on campus are not permitted to provide alcohol to individuals under 18 years of age. Disruptive behavior related to the consumption of alcohol is not permitted even if the alcohol is consumed off campus. Given the health concerns related to the over-consumption and rapid consumption of alcohol individuals may not possess excessive amounts of alcohol on campus and/or possess or use devices intended for the rapid consumption of alcohol in on campus student housing facilities. This includes, but is not limited to, kegs, beer bongs, and beer pong. Collections of alcohol containers are not permitted on campus. Additionally, alcohol may not be consumed in public spaces including, but not limited to, hallways,

[10] The legal drinking age in Austria is 18 years old.

[11] While the University does sublease certain housing units to students, none of this housing is within 1 mile of campus.

lounges, parking lots, or any patios/balconies. Students, faculty or staff in violation of the University's Alcohol Policy are referred to Student Affairs (students) or Human Resources (faculty/staff) and may be referred to local law enforcement if they are in violation of applicable alcohol laws.

University Drug Policy

The possession, use and sale of illegal drugs is prohibited on the University campus and illegal under both state and federal law. Campus administration works collaboratively with the Dean of Students Office and other personnel at the main campus is Webster Groves, Missouri to enforce these laws. Students, faculty or staff in violation of the University's Drug Policy will be referred to Student Affairs (students) or Human Resources (faculty/staff) and may be referred to local law enforcement if they are in violation of applicable drug laws.

Drug and Alcohol-Abuse Education Programs

Oversight for the University's Alcohol and other Drug Education and Prevention (AOD) program is formally housed within the Department of Counseling/Life Development at the main campus in Webster Groves, Missouri. Dr. Patrick Stack, Director of Counseling/Life Development at the Webster Groves campus is a Certified Reciprocal Advanced Alcohol Drug Counselors (CRAADC). A CRAADC credential requires a minimum of a master's degree in mental health counseling, didactics in substance abuse education and prevention, 100 hours of supervision, and candidates must successfully pass a national exam. Drug and Alcohol programs at this campus are coordinated through the collective efforts of the Student Resource Center and Residential Life. The goal is to support and promote healthy choices that promote a healthy learning environment. Specifically, the University's efforts include developing programs associated with student involvement, relationships, personal development, social responsibility and the use of alcohol, tobacco, and other drugs. Some of the program elements related to drug or alcohol-abuse education programs include:

- Counseling/Life Development is available to assist students with alcohol/drug issues. Professional counselors provide treatment for substance abuse. Specifically, Counseling staff engage the University community by providing annual alcohol/drug training for resident assistant staff, including awareness of resources on campus and how to respond to alcohol/drug emergencies.
- The Head of Student Resource Center and the Director of Counseling work together to address reports of troubling behavior which could potentially lead to security concerns on campus.
- The effects of alcohol and/or drug usage are addressed within the University's sexual misconduct prevention programming maintained and administered by the Dean of Students office.
- The Office of Human Resources is required to communicate with all employees regarding drug/alcohol abuse in the workplace.
- The effects of alcohol and drug usage are addressed within the University's sexual misconduct prevention programming.
- Issues related to alcohol and drug usage are included in the training provided to individuals serving on the University Conduct Board.

POLICIES AND PROCEDURES RELATED TO SEXUAL ASSAULT, DATING VIOLENCE, DOMESTIC VIOLENCE, AND STALKING

This section of the Annual Security Report discusses the serious topic of sexual assault, dating violence, domestic violence, and stalking. The following pages include important information on topics such as prohibited conduct, and options for reporting sexual assault, dating violence, domestic violence, and stalking. This section also includes information on associated disciplinary proceedings, as well as information about the University's education and awareness campaigns, and local resources (both on campus and in the community) available to assist reporting parties with a wide range of issues.

Policies on Sexual Assault, Harassment, and Other Sexual Offenses

Webster University is committed to maintaining a safe learning and working environment that is free of discrimination, harassment, sexual violence, and other forms of sexual misconduct that undermine its educational mission. Our training programs and educational tools related to sexual assault, harassment and other sexual offenses inform Webster students and employees of these prohibited activities and the corresponding obligations and procedures for reporting and responding to related complaints.

While the University makes every effort to educate the community to prevent sexual assault, harassment, and other sexual offenses from occurring, we are also committed to providing support to those affected when this behavior does occur. The University's Extended Campus Code of Conduct full policy is located at: https://www.webster.edu/student-handbook/index.php. The entire Webster University Grievance Policy & Procedures is available at: https://www.webster.edu/human- resources/hr-policies.php University policy prohibits (among other conduct) the crimes of domestic violence, dating violence, sexual assault, and stalking.

The definitions of the offenses of sexual assault, dating violence, domestic violence, and stalking used in reporting Clery Act crimes in the annual statistics appear below. [12] These definitions of dating violence, domestic violence, and stalking come from the Violence Against Women Act (VAWA), and the definition of sexual assault comes from the FBI's UCR program and which can be found in Appendix A of 34 CFR Part 668.

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

[12] Appendix C provides local law definitions for these crimes. These definitions are not used to classify crimes in the included annual statistics; however, they are provided for education and awareness purposes.

Domestic violence: A Felony or misdemeanor crime of violence [13] committed –

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

Stalking: Engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- Fear for her, his, or others' safety; or
- Suffer substantial emotional distress.

For the purposes of this definition:

- 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.
- Reasonable person means a reasonable person under similar circumstances and with similar identities to the victim.
- Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

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:** 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:** The touching of the private parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.
- **Incest:** Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
- **Statutory Rape:** Sexual intercourse with a person who is under the statutory age of

[13]The term "crime of violence" is defined by 18 U.S. Code Section 16 as follows:

a. an offense that has as an element the use, attempted use, or threatened use of physical force against the person or property of another, or
b. any other offense that is a felony and that, by its nature, involves a substantial risk that physical force against the person or property of another may be used in the course of committing the offense.

consent.

While all sexual assaults reported to a Campus Security Authority are included in the annual crime statistics and Daily Crime Log without regard to the issue of consent, the University's definition of consent (both in regard to university policy and local law) is an essential component of the University's primary and ongoing prevention and awareness programs.

According to Webster Vienna Private University policy, Consent is NOT:

- Not taking "No" for an answer
- A disengaged or unresponsive partner
- What someone is/is not wearing
- Being incapacitated due to drugs or alcohol
- Based on a previous relationship
- A strong and enthusiastic "YES" is consent.

The University's definition of consent is provided above; however, the local law definition is provided in Appendix C for education and awareness purposes. The University's definition of consent is used to identify potential misconduct from a sexual assault perspective in connection with disciplinary procedures.

Contact Person for Employees Reporting Sexual Offenses

Charles Burton,
Chief Human Resources Officer
Office: 314-246-6960
Charlesburton@webster.edu

Contact Person for Students Reporting Sexual Offenses

Johannes Pollak
Campus Director
Office: +43 1 269 9293 Ext 4301
johannespollak61@webster.edu

Webster also reserves the right to engage additional trained staff members on an ad-hoc basis as necessary.

Reporting Sexual Assault, Dating Violence, Domestic Violence or Stalking

The University offers individuals a number of reporting options which are outlined below; however, the University strongly encourages reporting to the Sexual Offense Advocate. The Sexual Offense Advocate is trained to provide assistance in making decisions about pursuing medical attention, counseling/support services, filing campus disciplinary procedures, preserving evidence, and filing criminal and/or civil charges. In cases where the alleged perpetrator poses a perceived threat to the campus community, the Sexual Offense Advocate may work with the appropriate administrators to issue a temporary ban from or restricted access to campus for that person. Regardless of which reporting option an individual ultimately chooses, he or she, at his or her discretion, may choose anyone he or she would prefer to serve as a support person at all times.

Confidential Reports to the Sexual Offense Advocate

A person who is the reporting party of a sexual offense, or who witnesses a sexual offense, is

encouraged to make a report to the Sexual Offense Advocate**. Individuals are encouraged to first report any issues to the Sexual Offense Advocate as such initial reports will be kept completely confidential as the Sexual Offense Advocate is not required to report any information about an incident to Human Resources or the Campus Director without a reporting party's permission.** Reports of sexual assault, dating violence, domestic violence or stalking made to the Sexual Offense Advocate which meet the definition of a Clery Act Crime and which occur within the University's Clery Act Geography are still included in the University's Daily Crime Log and annual crime statistics, but neither the Log nor the statistics ever include any personal-identifying information. Sexual assaults reported to the Sexual Offense Advocate which meet the definition of a Clery Act Crime and which occur within the University's Clery Act Geography may also result in a Timely Warning (Campus Safety Alert); however, Timely Warnings never include information that identifies the reporting party.

The Sexual Offense Advocate can advise reporting parties regarding their options in making a report about any sexual offense pursuant to these policies and procedures to the appropriate administrator. **The is no Sexual Assault Advocate for the Vienna campus; however cases can be reported to the campus director by calling +43 1 269 9293 Ext 4301, or by calling the sexual offense advocate on the main campus, who is available 24 hours a day at 00+1+314-252-8304.**

The Sexual Offense Advocate is designated by the University as the support and resource person for all students and employees who believe they have experienced sexual assault or a sexual offense. The Sexual Offense Advocate is available to assist campus community members with the following areas of concern:

- The Sexual Offense Advocate has training in crisis intervention and support techniques, and provides emotional, medical, and/or judicial support either directly or through on- or off-campus referral.
- The Sexual Offense Advocate informs the person of all rights under University policy and provides procedural information and support as needed. The Advocate also works with administrators when necessary to advise the person regarding options available for filing civil and/or criminal charges related to the offense. Those who believe they have experienced a sexual offense may also report the offense directly to the appropriate administrator as indicated above.
- The Sexual Offense Advocate may serve as the reporting party's support person during all proceedings carried out under University auspices.

The Sexual Offense Advocate can assist the reporting party in understanding options related to pressing civil and/or criminal charges as well as in the process of working with local law enforcement authorities. **The only way in which an individual can report a sexual offense with complete confidentiality is to contact the Sexual Offense Advocate or another professional or pastoral counselor at the University.**

Reports to Local Law Enforcement

As noted above, the Sexual Offense Advocate can assist reporting parties with notifying local law enforcement agencies. Alternatively, reporting parties also have the option of reporting incidents directly to local law enforcement authorities themselves. Local police can be reached in cases of emergency by dialing 133.

Sexual assault, dating violence, domestic violence and stalking also constitute potential criminal acts that could be grounds for criminal and/or civil action. Reporting parties have the right to file a

criminal complaint against the perpetrator of the sexual offense and a report with Webster University simultaneously.

When making a report, the party talk to the law enforcement officer and provide a written statement about the incident. The law enforcement agency would then handle any investigation or resources directly with the reporting party.

Reports to Human Resources or the Campus Director

The Sexual Offense Advocate will strongly recommend that all individuals confidentially reporting sexual offenses to the Sexual Offense Advocate file a written statement with Human Resources or the Campus Director. Individuals also have the option to make reports directly to Human Resources or the Campus Director. Once reported to Human Resources or the Campus Director, any necessary interim steps will be taken pursuant to University policy. Additionally, such reports will be handled consistent with university policy regarding investigation, adjudication, and resolution.

Important Information Regarding Confidentiality

To the extent possible, strict confidentiality will be maintained by all parties regarding all matters relevant to grievances on a need-to-know basis with the following previsions. In the case of informal grievances, consent is required of the Complainant before discussing the issue with other parties. In the case of formal grievance's, the Respondent and the Complainant and in the case of employees the Respondent's management will be notified. Members of the Grievance Panes, as described later in this policy, shall not discuss the grievance outside of the Hearing Panel meetings and shall not accept side conversations with persons who are not part of the formal hearing process.

There are only two types of University employees who are not required to forward these types of reports to Human Resources or the Campus Director: 1) the Sexual Offense Advocate, [14]2) a Professional or Pastoral Counselor [15]who is who is employed by the University in that capacity and is acting in that role at the time the disclosure is made.

As required by law, disclosures to any other Webster University employee of a sexual assault, incident of dating violence, domestic violence or stalking will be forwarded to Human Resources or the Campus Director, and in the event that the incident meets the definition of a Clery Act Crime and allegedly took place on the University's Clery Act Geography will be included in the University's Daily Crime Log, and the annual crime statistics, and may result in a Timely Warning (Campus Safety Alert). However, the Daily Crime Log, annual crime statistics, and Timely Warnings never

[14]Note that disclosures to a professional or pastoral counselor at the University, who is acting in that role at the time the information is received, will not be included in the University's Daily Crime Log or annual crime statistics, and will not result in a Timely Warning (Campus Safety Alert) unless the reporting party gives his or her permission for the counselor to forward information about the incident to another employee or department at the University such as the Sexual Offense Advocate, Human Resources, the Campus Director, or the Department of Public Safety.

[15] Note that disclosures to a professional or pastoral counselor at the University, who is acting in that role at the time the information is received, will not be included in the University's Daily Crime Log or annual crime statistics, and will not result in a Timely Warning (Campus Safety Alert) unless the reporting party gives his or her permission for the counselor to forward information about the incident to another employee or department at the University such as the Sexual Offense Advocate, Human Resources, the Campus Director, or the Department of Public Safety.

include any personally identifying information [16] about the reporting party.

Victims may request that directory information on file with the University be withheld by request in the registrar's office. Regardless of whether a victim has opted-out of allowing the University 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 University 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.

Seeking Prompt Medical Attention

Regardless of whether (or to whom) an individual chooses to make a report, the University strongly encourages anyone who has experienced sexual intrusion, sexual penetration, dating or domestic violence to seek prompt medical attention. A medical examination can identify any internal trauma, test for sexually transmitted diseases, as well as obtain appropriate medical evidence should one choose to pursue legal charges at some later date. In the event that an individual chooses not to participate in forensic evidence collection, health care providers can still treat injuries and take steps to address concerns of pregnancy and/or sexually transmitted diseases. [17]

Individuals who wish to obtain a confidential forensic examination by a Sexual Assault Nurse Examiner should contact the Sexual Offense Advocate for assistance with a referral. Any of the other individuals or departments listed above can also assist reporting parties with referrals to an appropriate medical provider.

Preserving Evidence

Regardless of when and to whom an individual chooses report to, it is important that a reporting party immediately preserve any evidence that may assist in establishing the facts of the alleged violation so that authorities and relevant administrators may ultimately take appropriate action against the responding party. It is important to preserve evidence that may assist in proving that the alleged criminal offense occurred or may be helpful in obtaining a protection order. Such evidence may include, but is not necessarily limited to, physical evidence or electronic or written

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[16] The term personally identifying information is defined in section 40002(a)(20) of the Violence Against Women Act of 1994 (42 U.S.C. 1395(1)(20)).

Other Considerations Regarding Incidents of Sexual Assault, Dating Violence, Domestic Violence or Stalking

[17] 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."

communications.

Preserving Physical Evidence through a Forensic Exam

Any individual who believes he or she may wish to pursue legal charges are advised not to bathe, douche, smoke, change clothing or clean the bed/linen/area where they were assaulted (if the offense occurred within the past 96 hours) prior to a medical exam. However, individuals who have already engaged in any of these activities, can still choose to have an exam performed.

Preserving Other Forms of Evidence

In cases where individuals believe they may be interested in pursuing criminal and/or civil charges, it is also important to work with local law enforcement agencies so that statements can be taken and evidence can be collected immediately. Reporting parties are also encouraged to save evidence such as letters, notes, emails, records of phone calls, videos, photos, texts, social media postings (Facebook, Twitter, etc.), computer screenshots, voicemails, or any other form of evidence that may be helpful to a criminal investigation or campus judicial proceeding.

Amnesty from University Drug and Alcohol Policy

In an effort to encourage reports of sex offenses, individuals who report sexual misconduct, either as a reporting party or a third-party witness, will not be subject to disciplinary action by the University for his/her/their own personal consumption of alcohol or drugs at or near the time of the incident, provided any such violations did not and do not place the health or safety of any other person at risk. The University may, however, initiate an educational discussion or pursue other educational remedies regarding alcohol or other drugs. The amnesty policy applies to the University's student conduct process.

University Response to Reports of Sexual Assault, Dating Violence, Domestic Violence or Stalking

The University will promptly and effectively respond to reports of sexual offenses and harassment and will take appropriate action to prevent, correct, and if necessary, discipline behavior that violates policy. While the University takes reporting parties' confidentiality very seriously, it is important for reporting parties to recognize that the level of confidentiality their report will receive under law varies depending on who they make their report to. The only way in which an individual can report a sexual offense with complete confidentiality is to contact the Sexual Offense Advocate or another professional or pastoral counselor at the University.

As explained above, the University also strongly encourages reporting parties to notify local law enforcement authorities (and can assist in doing so); however, it is important to know that regardless of who the incident is reported to, reporting parties[18] always have the right to decline to notify local law enforcement authorities. Similarly, the University never requires reporting parties to participate in any investigation or disciplinary proceeding.

The University strictly prohibits retaliation against a party who reports a sexual offense, or for assisting another in reporting a sexual offense or filing a complaint. Retaliation is a clear violation of University policy, and applicable law, and is a serious offense that may result in separate

[18]The only exception is in cases involving a minor, as the University must notify law enforcement pursuant to the law in certain jurisdictions.

disciplinary action.
Any time a student or employee reports to the University that the student or employee has been a victim of dating violence, domestic violence, sexual assault, or stalking, whether the offense occurred on or off campus, the institution will provide the student or employee with a written explanation of the student or employee's rights and options, including:

- the procedures affected individuals 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 reporting parties and other necessary parties.
- a statement that the institution will provide written notification to students and employees about support 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 interim protective measures; and
- an explanation of the procedures for institutional disciplinary action.

Orders of Protection

Webster University encourages reporting parties of sexual misconduct to make a formal report to the appropriate local law enforcement authorities for the purpose of filing a criminal complaint and/or seeking and enforcing a no contact, restraining or similar Court Order and has the right to be assisted by the University in exercising this option. Contact Student Affairs, Human Resources, or the Sexual Offense Advocate for questions or assistance with obtaining an order of protection in Vienna.

Members of the Webster University community who receive a lawful order of protection should provide a copy to the Director of Operations. The University also suggests that individuals with orders of protection meet with the Campus Director to develop a Safety Action Plan – a plan intended to reduce the risk of harm while on campus or coming and going from campus. This plan may include, but in not limited to, escorts and special parking arrangements.

In addition to orders of protection issued by the courts, Webster University may impose a university- based no contact directive. A university-based no contact directive prohibits an individual from contacting a specific person or specific people until rescinded. Contact includes, but is not limited to in person, by phone, text messaging, social media, by third person, etc.

Students or staff also have the right to request that his or her campus directory information on file be removed from public sources by directing a request to the Office of the Registrar, Loretto Hall 63, Webster Groves Main Campus, 314-968-7450/800-987-3447, registrarsoffice@webster.edu

Interim Protective Measures Available to Reporting Parties

The University provides written notification to reporting parties about options for, available assistance in, and how to request changes to academic, living, transportation, and working situations or protective measures. The institution will provide such protective measures if they are reasonably available, regardless of whether the victim chooses to report the crime to campus police or local law enforcement. Whenever an individual reports a sexual assault, incident of dating violence, domestic violence or stalking, the written explanation of the reporting party's rights and options provided by the University will include information regarding how to request changes to academic, living, transportation and working situations or protective measures; and the University

is obligated to comply with any reasonable requests following a report of an alleged sexual assault, incident of domestic violence, dating violence or stalking.

Interim protective measures are available to reporting parties and responding parties involved in reports of sexual assaults and other offenses before the report is resolved, or in special circumstances even if the reporting party chooses not to file a complaint.

These options include modifications to academic schedules, campus housing, student leadership, working situations, as well as providing academic support or making special arrangements for withdrawing or dropping classes without penalty, if requested and reasonably available, regardless of whether the reporting party chooses to file a formal report. No contact measures may also be implemented.

Any interim protective measures imposed should avoid any lasting negative effects on the any party before any findings of responsibility are made as much as is possible in the circumstances presented.

The University maintains the confidentiality of any protective measures provided to any involved party to the extent that maintaining such confidentiality would not impair the ability of the institution to provide the accommodations or protective measures.

On Campus Resources Available to Parties Reporting Sexual Assault, Dating Violence, Domestic Violence or Stalking

Whenever an individual reports a sexual assault, incident of dating violence, domestic violence or stalking, the written explanation of the reporting party's rights and options provided by the University will include information on the following resources:

Counseling & Mental Health Services - In addition to the variety of assistance provided to reporting parties by the University's Sexual Offense Advocate, after an initial appointment with the Student Counseling Center, you will be advised whether we can offer you student counseling on-site, whether you see a clinical psychologist on site, or whether we recommend you obtain services from external provider. Counseling services can be reached via email at counseling@webster.ac.at

Health Services - The University does not offer reporting parties legal assistance on campus, but the Student Resource Center Officer, + 43 1 269 92 93 4355 can assist with referrals to a full range of health services.

Victim Advocacy Services – As explained above, the University's Sexual Offense Advocate can assist reporting parties with a full range of advocacy services.

Legal Assistance – The University does not offer reporting parties legal assistance on campus, but the University's Sexual Offense Advocate can assist with legal referrals.

Visa & Immigration Assistance – MA 35 Einwanderung und Staatsbuergerschaft, Dresdner Strasse 93, 1200 Vienna, phone +43 1 40003535.

Student Financial Aid – Anna Gallistl, Finance Officer can be reached at +43 1 269 92 93 4344 or by email at anna.gallistl@webster.ac.at

Additional Services – Reporting parties can always contact the University's Sexual Offense Advocate for assistance with other related services which are not included here.

Community Resources Available to Parties Reporting Sexual Assault, Dating Violence, Domestic Violence or Stalking

Whenever an individual reports a sexual assault, incident of dating violence, domestic violence or stalking, the written explanation of the reporting party's rights and options provided by the University will include information on the following off campus resources:

Counseling, Mental Health, Health, Victim Advocacy & Legal Services – The following local organizations can assist reporting parties with counseling, mental health, victim advocacy and legal services referrals:
Women:
Frauenhelpline 0800 222 555
Men:
Mannernotruf 0800 246 247

The U.S. Embassy is located at Boltzmanngasse 16, 1090 Vienna, Austria. The Embassy can be reached by phone at +43 1 31339-0 during emergencies.

Visa & Immigration Assistance – MA 35 Einwanderung und Staatsbuergerschaft, Dresdner Strasse 93, 1200 Vienna, phone +43 1 40003535.

Student Financial Aid - The Department of Education's Federal Student Aid office's website is: https://studentaid.gov/. They can be reached by phone at 1-800-433-3243.

General Information Regarding Institutional Disciplinary Proceedings Related to Reports of Sexual Assault, Dating Violence, Domestic Violence or Stalking

The University will take disciplinary action against an individual found to have engaged in sexual assault, domestic violence, dating violence, and/or stalking. The type and severity of disciplinary action taken will depend upon the specific violation(s) and the specific circumstances of each case.

Webster is committed to providing prompt, fair, and impartial investigation and resolution of reports of violations of University policy. The University's disciplinary process is consistent with the University's policy, transparent to the reporting party and responding party and will include a prompt, fair, and impartial investigation and resolution process. All reports received Human Resources, or the Campus Director are handled consistent with University policy regarding investigation, adjudication, and resolution. The accuser and the accused will have timely notice for meetings at which the accuser or accused, or both, may be present. 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.

University policy states that both parties will be notified regarding procedures used in the hearings. Information can also be provided regarding legal options; however, it is recommended that legal advice be obtained from a competent attorney. The University's proceedings also provide the reporting party and the responding party with the same opportunities to have an advisor of his/her

choice present during any institutional disciplinary proceeding. This includes the right to be accompanied by an advisor (i.e., any individual who provides the reporting party or responding party support, guidance, or advice) to any related meeting or proceeding. The University will not limit the choice of or presence of an advisor for either the reporting or responding party in any meeting or institutional disciplinary proceeding.

Timeframe for Disciplinary Proceedings

The University's proceedings are completed within reasonably prompt timeframes and includes a process that allows for the extension of timeframes for good cause with written notice to the reporting party and the responding party of the delay and the reason for the delay.
Officials Conducting Disciplinary Proceedings
Disciplinary proceedings will be conducted by individuals who receive annual training on the issues related to dating violence, domestic violence, sexual assault, and stalking and on how to conduct an investigation and hearing process that is free of bias and protects the safety of the reporting party and promotes accountability.

Notifications to Reporting and Responding Parties

In all cases of allegations of violations of the Policy, the reporting party and responding party will receive simultaneous notification, in writing, of: (1) any result of a disciplinary proceeding (including the rationale for the result and any sanctions imposed); (2) procedures for the reporting party and responding party to appeal the result of the disciplinary proceeding; (3) any change in the result of a disciplinary proceeding (including the rationale for the result); and (4) when the results of any disciplinary proceeding become final.

Standard of Evidence

Each type of disciplinary proceeding uses a "preponderance of evidence standard." The "preponderance" standard is met if the proposition is more likely to be true than not true. The responding party must not be presumed responsible. Instead responsibility, must be established by a "preponderance of the evidence" (e.g., "more likely than not") standard. "Preponderance" means more than half. If, for example, the hearing board concludes that the evidence—considered overall—weighs equally on both sides, the preponderance standard has not been met and the charges have not been proven.

Sanctions

All sanctions will be imposed consistent with University policy.

UNIVERSITY DISCIPLINARY PROCESSES

Employee Grievance Procedures (3.3)

Informal Grievance Resolution (3.3.1)

WVPU encourages employees to first pursue informal resolution as close to the source of the conflict as possible. Parties to disputes should resolve conflicts respectfully, objective, and solution- oriented with the supervisor in charge and develop a transparent and fair solution for all parties.
The respective supervisor is the first point of contact for solving disputes informally.

The supervisor should address any informal grievance raised to a supervisor without unreasonable delay. This may include meeting with the individual who raised the grievance, the person against whom the grievance is raised, or other witnesses. The supervisor will inform the employee of measures taken orally or in writing. A written reply should be provided if the employee requests it.

Multiple alternative channels are available If the employee feels uncomfortable discussing the grievance with their supervisor, if the supervisor is party to the complaint, or if no agreement has been reached. They may raise an informal grievance in a confidential conversation with a grievance coordinator, who may be either representative of the Works Council (WC), Working Group for Equal Opportunity (WGEO), or with Human Resources (HR).

Consultations with any of the supports listed above are intended to provide advice, aid an individual in determining whether to try to resolve the situation on his or her own; to help the individual understand the WVPU's formal and informal grievance procedures; and to provide a safe and private setting in which to discuss the incident(s) that give rise to the concern.

Strict confidentiality shall be maintained in the informal procedure unless otherwise agreed with the Complainant, or if someone's immediate safety is at risk. The support party approached with the grievance (representative of the WGEO, WC, or HR), henceforth the 'Grievance Coordinator', may ask for consent to discuss the issue raised with defined individuals to better resolve the issue.

Examples of resulting steps from an informal grievance include the following:

- Notice to the Respondent (if any) of the behavior and the impact of the behavior on the Complainant
- Mediation agreed upon by Complainant and Respondent
- Referral of the grievance to an appropriate individual for assistance in reaching a resolution
- Referral to coaching or counseling services
- Recommendations of measures to improve the general workplace climate in the affected department

The employee may at any point elect to pursue a formal grievance procedure, which is outlined below, or may contact an alternative Grievance Coordinator.

Formal Grievance Procedures (3.3.2)

If attempts to resolve concerns informally prove unsuccessful or if the Complainant feels that the matter is sufficiently serious to address formally, he or she may initiate a formal grievance procedure. The purpose of the formal grievance procedures is to identify if there is an issue that needs to be addressed and what steps should betaken, including organizational measures.

The formal grievance proceedings consist of the following steps:

1. A written statement is submitted, and an initial meeting confirms the Complainant wishes to proceed.
2. An initial hearing by the Grievance Panel will confirm if the nature of the complaint constitutes a grievable offense.
3. An independent investigation will result in a report including findings and recommendations.
4. The Grievance Panel will conduct a hearing and conclude if a breach WVPU's code of conduct has occurred and will issue recommendations on remedial actions.
5. The Executive Board will address the recommendations and will provide a written explanation if any of the recommendations cannot be implemented.

The Grievance Panel consists of the Director or Associate Director, the Head of Human Resources, a Works Council representative, a member of the Working Group on Equal Opportunity, and a representative of the senate.

Decisions are made on the basis of majority.

In the event of a conflict of interest, including any involvement in the grievance, panel members must recuse themselves. When in doubt, a panel member(s) may be removed by document unanimous vote by the remaining members. Replacement members of the panel are selected by the remaining members.

Filing a Grievance (3.3.3)

The formal grievance procedure is initiated by a written statement describing the complaint and the intention to raise a formal grievance. This statement may be submitted to Human Resources or a member of the Works Councilor the Working Group on Equal Opportunities. This statement should set out clearly the nature of the grievance, concentrate on the facts of the situation.

The recipient of the written statement, the Grievance Coordinator, shall convene a confidential meeting with the Complainant within five working days of receiving the complaint. The purpose of this meeting is to ensure the Complainant understands WVPU's formal grievance procedures and wishes to proceed.

Initial Hearing (3.3.3.1)

Following the confirmation that the Complainant wishes to proceed, the Grievance Coordinator shall immediately notify the grievance panel members, any relevant supervisors, and any Respondents named in the complaint.

The Grievance Panel shall be convened within 10 working days of the meeting for an initial hearing. The objective of the initial hearing is not to determine facts, such as if the alleged behavior took

place, but only if whether the nature of the complaint constitutes a grievable issue.

If the panel determines by majority vote that the nature of the complaint constitutes a breach of the code of conduct, then an investigation shall be conducted, as outlined in the following section. If the Grievance Panel decides the issue is not grievable, then the Panel will prepare a written report of the Panel's findings and forward it to the Grievance Coordinator, the appropriate supervisors, the Complainant, and Respondents.

The Grievance Panel may also recommend interim measures pending the investigation to mitigate contact between a complainant, a respondent, and anyone involved in the investigation to ensure safety, prevent retaliation, and address an ongoing hostile environment.

Interim measures imposed on the respondent are not determinations of guilt. Such measures are implemented to ensure that the investigation and adjudication of a complaint proceeds as efficiently and swiftly as possible.

Investigation (3.3.4)

To ensure a fair investigation, the Grievance Panel shall appoint an independent party as an investigator. Wherever possible and appropriate this person shall be an external expert chosen based on the nature of the allegations. The investigation should generally begin no later than thirty days following the initial Grievance Panel hearing. The duration of the investigation will vary based on the nature of the grievance but should not exceed sixty days.

- The person carrying out the investigation shall:
- Interview the Complainant and Respondents separately
- Interview other relevant third parties separately
- Obtain and review any available evidence
- Review related policies and procedures
- Produce a report summarizing the evidence, detailing the investigations, findings, conclusions as well as recommendations
- Upon the conclusion of the investigation, the investigator will provide the investigative report and copies of any evidence to the Grievance Committee.

Grievance Panel Hearing (3.3.5)

Following the conclusion of the investigation, the Grievance Panel will convene to review the investigation and produce recommendations for further action. The panel should generally be convened within ten working days of the submission of the investigation report. The investigator should be available to attend the hearing to answer any questions of the Grievance Panel.
The objective of the hearing is to determine if a breach of the code of conduct has occurred and to issue recommendations. These can include (but are not limited to) disciplinary action against the Respondent (such as formal warnings, transfer to another position, suspension, or dismissal), changes to an organization’s policy or procedures, training, counseling, coaching, or mediation for the parties involved and supervisors, further investigation, or no further action. Even if the situation

is determined inconclusive, the Grievance Panel can recommend organizational measures that tackle related working conditions. The Grievance Panel may also request a consultation with the Complainant to discuss appropriate action.

The Panel shall prepare a written report summarizing their findings and recommendations on corrective action(s) to be taken if any. The report shall be submitted to the Director of the University and/or the University Council if there is a conflict of interest with the Director.

Implement Recommendations (3.3.5.1)

If the determination is made by the Panel that the grievance has merit, the University is obliged to take appropriate corrective, and remedial actions. The Executive Board or University Council will endeavor to implement the Panel recommendations as best as possible and will document all steps taken. If it is not possible to implement one or more of the recommendations, the Executive Board shall organize a meeting with the Grievance Panel to explain and discuss alternative measures.

Student Grievance Procedure (3.4)

Students may employ the Student Grievance Procedure to address serious non-academic complaints. Student non- academic complaints may stem from a broad set of causes including but not limited to matters of conduct by fellow students or university personnel or regarding the misinterpretation, misapplication, discriminatory application, of university policy or procedure excluding those pertaining to grading, assessment, and academic honesty.

Informal Resolution (3.4.1)

Where appropriate, students are encouraged to seek informal resolution of a grievance by bringing it to the attention of the relevant individual, administrator, or office. WVPU's Code of Conduct stipulates that conflicts should be resolved as close to the source of the conflict as possible. Parties to disputes should work to resolve conflicts in a respectful, objective, and solution-oriented manner and develop a solution that is transparent and fair to all parties.

Students may also raise informal complaints with the Student Resource Center Officer (SRC), or if the complaint involves the SRC the student may alternatively address the Office of the Director or the Working Group on Equal Opportunities (WGEO). Confidentiality shall be maintained unless otherwise agreed with the student raising the concern, or if someone's immediate safety is at risk. The support 10 party approached should seek consent to discuss the complaint with defined individuals to better resolve the issue.

The support party can propose resolutions measures including (but are not limited to):

- Notice to the Respondent (if any) of the behavior and the impact of their behavior on the Complainant
- Mediation agreed upon by Complainant and Respondent
- Referral of the grievance to an appropriate individual for assistance in reaching a resolution
- Referral to coaching or counseling services
- An administrative proceeding
- Formal Grievance Procedures

Formal Student Grievance Procedures (3.4.1.1)

If attempts to resolve concerns informally prove unsuccessful or if the Complainant feels that the matter is sufficiently serious to address formally, he or she may initiate a formal grievance procedure. The purpose of the formal grievance procedures is to identify if there is an issue that needs to be addressed and what steps should betaken, including organizational measures.

The grievance proceedings consist of the following steps:

1. A written statement is submitted, and an initial meeting confirms the Complainant wishes to proceed
2. An initial hearing by the Student Grievance Panel will confirm if the nature of the complaint constitutes a grievable offense
3. An independent investigation will result in a report including findings and recommendations
4. The Grievance Panel will conduct a hearing and conclude if a breach of WVPU's code of conduct has occurred and will issue recommendations on remedial actions
5. The Executive Board will address the recommendations and will provide a written explanation if any of the recommendations cannot be implemented.

If the Respondents named in the grievance are students, the Student Grievance Board shall be composed of the Director or Associate Director, a student representative nominated by the Student Government Association, the Student Resource Officer, a faculty member nominated by the University Senate, and a member of the Working Group on Equal Opportunities. If the grievance concerns the conduct of a university employee, the Grievance Panel shall be composed of the Director or Associate Director, a student representative nominated by the Student Government Association, the Head of Human Resources, and a representative nominated by the Works Council and a member of the Working Group on Equal Opportunities. Decisions shall be made on the basis of majority.

In the event of a conflict of interest, including any involvement in the grievance, panel members must recuse themselves. When in doubt, a panel member(s) may be removed by document unanimous vote by the remaining members. Replacement members of the panel are selected by the remaining members.

Filing a Grievance (3.4.1.2)

The formal grievance procedure is initiated by a written statement describing the complaint and the intention to raise a formal grievance. This statement may be submitted to the Student Resource Officer, a representative of the Student Government Association, or the Working Group on Equal Opportunities. This statement should describe the nature of the grievance and concentrate on the facts of the situation.

The recipient of the written statement, the 'Grievance Coordinator' (the representative from the SRC, WGEO, SGA, or WGEO) shall convene a confidential meeting with the Complainant within five working days of receiving the complaint. The purpose of this meeting is to ensure the Complainant understands WVPU's formal grievance procedures and wishes to proceed.

Initial Grievance Panel Hearing (3.4.1.3)

Following the confirmation that the Complainant wishes to proceed, the grievance coordinator shall immediately notify the Student Grievance Panel members, the appropriate supervisors, and any Respondents named in the complaint.

The grievance panel shall be convened within 10 working days of the meeting for an initial hearing.

The objective of the hearing is not to determine facts, such as if the alleged behavior took place, but only if the nature of the complaint constitutes a grievable issue. Additionally, in complaints regarding student conduct, the Student Grievance Panel may refer the case to the Student Conduct Board.

If the Panel determines by majority vote that the nature of the complaint constitutes a breach of the code of conduct and warrants a full investigation, an investigator shall be appointed as outlined in the following section. If the panel decides that the complaint constitutes a breach of the code of conduct but can be best resolved by a Student Conduct Board hearing, then the hearing will take place as outlined in section 4.4. If the Panel decides the issue is not grievable, then the Panel will prepare a written report of the Panel's findings and forward it to the Grievance Coordinator, the appropriate supervisors, the Complainant, and Respondents.

The Grievance Panel may also recommend interim measures pending the investigation to mitigate contact between a complainant, a respondent, and anyone involved in the investigation to ensure safety, prevent retaliation, and address an ongoing hostile environment. Interim measures imposed on the respondent are not determinations of guilt. Such measures are implemented to ensure that the investigation and adjudication of a complaint proceeds as efficiently and swiftly as possible.

Investigation (3.4.1.4)

To ensure a fair investigation, the grievance panel shall appoint a neutral party as the investigator. When the grievance concerns the behavior of employees, if possible, the investigator shall be an external expert chosen based on the nature of the allegations. The investigation should begin no later than thirty days following the initial Grievance Panel hearing. The duration of the investigation will vary based on the nature of the grievance but should not exceed sixty days.

- The person carrying out the investigation shall:
- Interview the Complainant and Respondents separately
- Interview other relevant third parties separately
- Obtain and review any available evidence
- Review related policies and procedures
- Produce a report summarizing the evidence, detailing the investigations, findings, and recommendations

Upon the conclusion of the investigation, the investigator will provide the investigative report and copies of any evidence to the Grievance Committee.

Grievance Panel Hearing (3.4.1.5)

Following the conclusion of the investigation, the Student Grievance Panel will convene to review the investigation and develop recommendations for further action. The panel should generally be convened within ten working days of the submission of the investigation report. The investigator should be available to attend the hearing to answer any questions of the Student Grievance Panel.

The objective of the hearing is to determine if a breach of the code of conduct has occurred and to issue recommendations. These can include (but are not limited to) disciplinary action against the Respondent (such as formal warnings, transfer to another position, suspension, or dismissal), changes to an organization’s policy or procedures, training, counseling, coaching, or mediation for the parties involved, further investigation, or no further action. The Grievance Panel may also request a consultation with the Complainant to jointly agree on appropriate action.

The Panel shall prepare a written report summarizing the findings and recommendations on corrective action(s) to be taken if any. The report shall be submitted to the Director of the University and/or the University Council if there is a conflict of interest with the Director.

Implementation of Recommendations (3.4.1.6)

If the determination is made by the Panel that the grievance has merit, the University is obliged to take appropriate, corrective, and remedial actions. The university rectorate will endeavor to implement the panel recommendations as best as possible and will document all steps taken. If it is not possible to implement one or more of the recommendations, the rectorate shall organize a meeting with the Panel members to explain and discuss alternative steps.

Student Conduct Procedures (4)

WVPU student conduct procedures are in place to respond to alleged student breaches of the WVPU Code of Conduct or non-compliance with other (non-academic) university policies. They provide a fair system that is intended as much for guidance and correction of behavior as for invoking fair and appropriate sanctions. The procedures are designed to determine whether students' alleged behaviors violate the WVPU Code of Conduct or other relevant policies and determining appropriate actions.

Reports of Alleged Violations (4.1)

Reports of student conduct that may involve a possible violation of the WVPU Code of Conduct and associated policies may be brought to the Student Resource Center, the Head of the Academic Department of the Student, or the office of the Director.

Confidentiality and Records (4.2)

To the extent possible, strict confidentiality will be maintained by all parties regarding alleged student conduct violations, hearings, and sanctions on a need-to-know basis.

Reports of alleged student conduct violations and outcomes of administrative proceedings shall be confidentially recorded by the Student Resource Center and shall not be forwarded to any third party. These records shall be released to Student Conduct Board in the event of conduct hearings or Grievance involving the Respondent named in the records, or the event of a legal proceeding involving the report. The records shall be deleted seven years from the date of the initial record.

Once a case has been referred to the Student Conduct Board it shall be entered into Webster University's student conduct software along with the outcome and may be considered in future decisions involving the student, such as for study abroad opportunities.

Administrative Proceeding (4.3)

Many minor disputes or infractions can be handled within the context of administrative proceedings. Upon receiving reports of alleged student misconduct, the Student Resource Center, an Academic Department Head, or the Director or Associate Director may request an administrative proceeding.

The administrative proceedings are chaired by the Academic Director, Associate Director, or a designate and are attended by the Student Resource Officer and the Student Resource Officer. If there is more than one Respondent, each shall be granted his or her own proceeding.
During the administrative proceeding, the Respondent and the participants will engage in a

conversation to discuss the circumstances of the alleged violation, responsibility, and appropriate sanctions. The Director or Associate Director may withdraw any alleged violation deemed to be without basis. Sanctions resulting from administrative proceedings exclude dismissal and suspension but may include (but are not limited to) written warnings to the Respondent, an essay, action plan, or written reflection to be provided by the student, an agreement with the Respondent not to contact named individuals or removal from a course.

Cases in which Respondents do not agree with the proposed resolution or do not accept responsibility will proceed to a hearing by the Student Conduct Board.

Student Conduct Board (4.4)

The purpose of the Student Conduct Board (SCB) is to conduct a formal hearing of alleged student conduct violations, deciding if the alleged violations took place and on any resulting sanctions and action, up to and including suspension and dismissal. The student conduct board allows students facing accusations of misconduct the opportunity to have their case heard before a panel of their peers, staff, and faculty.

The Student Conduct Board can hear cases referred from administrative proceedings, or the Director or Associate Director can also immediately refer a case to a hearing when the case involves serious allegations or if the student denies the reported behavior. Cases involving sexual misconduct and serious allegations of bullying or harassment requiring thorough investigation should be handled WVPU'S formal grievance procedures (see section 3).

The Student Conduct Board is composed of the Director or Associate Director, two student representatives nominated by the Student Government Association, the Student Resource Officer, and a faculty member nominated by the University Senate. The decisions shall be based solely on information and statements introduced at the hearing. All decisions shall be made by a majority vote. Any Student Board Member with a conflict of interest or material bias must recuse themselves from all procedures relating to the hearing aside from testifying. Replacement members may be selected by the remaining board members.

The Student Resource Office shall be responsible for organizing a time for the hearing and notifying all parties who are to testify and collecting and forwarding all pertinent data and evidence to the Student Conduct Board members. The SRC officer shall also give appropriate advance notice, in writing, of the charges against the student and copies of the available evidence, to ensure that he or she may adequately prepare for such a hearing. The notice indicates the date, time, and place of the hearing. The notification should be received by the student at least ten calendar days before the hearing. The Respondent may submit additional evidence, the names of any witnesses to testify on his or her behalf, written statements from absentee witnesses to the SRC Officer no later than three days before the hearing.

At the student conduct hearing, the Respondent shall have to opportunity to present his or her side, explain any evidence her or she submitted in advance, as well as call on any relevant witnesses (character witnesses are not relevant to this procedure). The SRC officer shall present any other evidence and call on any other relevant witnesses. Once all testimony is heard or read, the Respondent may make a final statement and the Board members are given a final opportunity to ask questions. All persons other than Board members are excused and the Board meets to render a decision.

The Student Conduct Board shall decide if the Respondent was responsible, not responsible, or shall choose to continue the case to obtain additional information or need for further consideration. If the Respondent was found to be responsible, the board shall decide on any sanctions up to and including dismissal. It may also issue related recommendations to improving the learning environment at WVPU, such as needed training, prevention, missing resources, or changes in university policies and procedures. The decision shall be provided, in writing, to the student.

Policy Regarding Educational Programs and Campaigns to Prevent Dating Violence Domestic Violence, Stalking and Sexual Assault

Webster University engages in comprehensive, intentional, and integrated programming, initiatives, strategies, and campaigns intended to end dating violence, domestic violence, sexual assault and stalking that are comprehensive, intentional, and integrated programming, initiatives, strategies, and campaigns intended to end dating violence, domestic violence, sexual assault, and stalking that—

1. 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

2. Consider environmental risk and protective factors as they occur on the individual, relationship, institutional, community and societal levels.

The University places a strong emphasis on prevention and education programs and communications as effective ways to minimize sexual assault, harassment and other sexual offenses; to inform students and employees of key definitions of all types of sexual misconduct, the importance and meaning of consent in sexual relations and the role that incapacity plays in these offenses; strategies to stay safe, and bystander education. Programs to prevent dating violence, domestic violence, sexual assault, and stalking include both primary prevention and awareness programs directed at incoming students and new employees and ongoing prevention and awareness campaigns directed at students and employees.

Bystander Intervention

The University takes care to educate students, staff and faculty about safe and positive options to prevent harm or intervene when there is a risk of dating violence, domestic violence, sexual misconduct, or stalking. This is commonly referred to as bystander intervention. 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. The University recognizes the importance of educating the campus community how to safely engage in bystander intervention.

All students are encouraged to report suspected sexual offenses, and in no case should intervene directly in a situation without assistance from the administration or authorities if doing so risks harm to the bystander or victim. Bystander intervention should be carried out only where safe and positive results are warranted. In all cases, bystanders should report any observed sexual offense. Employees are also required to comply with the reporting requirements for responsible employees.

Appendix E contains some suggested techniques for effectively engaging in bystander intervention. Additional training and information on bystander information is provided in all Primary Prevention and Awareness Programs and a number of the Ongoing Prevention and Awareness Campaigns.

Risk Reduction

Education on risk reduction is another important piece of education and awareness related to dating violence, domestic violence, sexual assault and stalking. In this context, risk reduction refers to 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. Information on risk reduction is included in all Primary Prevention and Awareness Programs and a number of the Ongoing Prevention and Awareness Campaigns. The University's suggested risk reduction strategies are based on the needs of the campus community and never encourage victim blaming.

The University's primary prevention and awareness programs for students and faculty/staff both include the following components:

- A statement that the University prohibits the crimes of domestic violence, dating violence, sexual assault and stalking;
- The VAWA definitions of domestic violence, dating violence, sexual assault and stalking;
- The Missouri state law definitions of dating violence, domestic violence,[19] sexual assault and stalking;
- The Missouri state law definition of consent;
- The University's definition of consent and the purposes for which that definition is used
- Descriptions of safe and positive options for bystander intervention;
- Information on risk reduction;
- A statement of policy regarding the institution's programs to prevent dating violence, domestic violence, sexual assault, and stalking, and of procedures that the institution will follow when one of these crimes is reported; and the procedural requirements for institutional disciplinary action in cases of alleged dating violence, domestic violence, sexual assault, and stalking.

Primary Prevention and Awareness Programs

All new incoming students to all of Webster's campuses are currently required to complete an online sexual misconduct awareness and prevention course developed in house and administered through the World Classroom online system. The online course reviews Webster University community expectations, directs students to campus support and prevention resources, provides contact information for the University Sexual Offense Advocate and provides Bystander Intervention techniques.
All new incoming faculty and staff at all of Webster's campuses are currently required to complete the Webster Professional Development Series online course on Sexual Assault, Harassment and Other Sexual Offenses also developed in house. This online course covers the key elements of the following federal statutes: the Clery Act, the Violence Against Women Act and Campus SaVE and Title VII.

[19] Some of these terms are not defined in certain jurisdictions.

Prevention and Awareness Campaigns

Webster University engages in ongoing prevention and awareness campaigns which focus on programming, initiatives, and strategies that are sustained over time and focus on increasing understanding of topics relevant to and skills for addressing dating violence, domestic violence, sexual assault, and stalking, using a range of strategies with audiences throughout the institution. The University utilizes a number of strategies and activities specifically designated to educate the community regarding sexual assault issues and to promote awareness of rape, acquaintance rape, and other sex offense prevention strategies. At the main campus in Webster Groves, Missouri, in addition to the frequent presentations and tables held throughout the year, the University annually promotes ongoing prevention and awareness through the use of posters, flyers, brochures, videos, and campus activities, particularly during the month of April which was Sexual Assault Awareness Month. Additional presentations or education materials at the main campus or the Vienna campus are always available to any student group or University department by contacting a Sexual Offense Advocate.

Additional presentations or education materials are always available to any student group or University department by contacting the Sexual Offense Advocate, Student Affairs or Human Resources.

In addition, many faculty, staff members and volunteers are classified as Campus Security Authorities and participate online and/or in person Clery Act training which also addressed issues addresses sexual assault, dating violence, domestic violence and stalking.

Sex Offender Registry

Austria does not maintain a sex offender registry.

APPENDIX A – Clery Act Crime Definitions

Murder/Non-Negligent Manslaughter: the willful (non-negligent) killing of one human being by another.

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

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:** 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:** The touching of the private parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.
- **Incest**: Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
- **Statutory Rape:** Sexual intercourse with a person who is under the statutory age of consent.

Robbery: the taking or attempting to take anything of value of the care, custody or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.

Aggravated Assault: an unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm.

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

Motor Vehicle Theft: the theft or attempted theft of a motor vehicle. (Classify as motor vehicle theft all cases where automobiles are taken by person not having lawful access, even though the vehicles are later abandoned – including joyriding).

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

Dating Violence: Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based 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.

Domestic violence: A Felony or misdemeanor crime of violence[20] committed –

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

Stalking: Engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- Fear for her, his, or others' safety; or
- Suffer substantial emotional distress.

For the purposes of this definition:

- 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.
- Reasonable person means a reasonable person under similar circumstances and with similar identities to the victim.
- Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

[20] The term "crime of violence" is defined by 18 U.S. Code Section 16 as follows:

a) an offense that has as an element the use, attempted use, or threatened use of physical force against the person or property of another, or
b) any other offense that is a felony and that, by its nature, involves a substantial risk that physical force against the person or property of another may be used in the course of committing the offense.

Weapons: Carrying, Possessing, Etc.: This classification encompasses weapons offenses that are regulatory in nature.

Drug Abuse Violations: the violation of laws prohibiting the production, distribution and/or use of certain controlled substances and the equipment or devices utilized in their preparation and/or use. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation or importation of any controlled drug or narcotic substance. Arrests for violations of state and local laws, specifically those relating to the unlawful possession, sale, use, growing, manufacturing and making of narcotic drugs.

Liquor Law Violations: the violation of state or local laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession or use of alcoholic beverages, not including driving under the influence and drunkenness.

Hate crimes: a criminal offense that manifests evidence that the victim was intentionally selected because of the perpetrator's bias against the victim.

The Department of Education directs institutions to report statistics for hate crimes in connection with the following offenses: Murder and Non-negligent Manslaughter; Sexual Assault; Robbery; Aggravated Assault; Burglary; Motor Vehicle Theft; Arson. These definitions are provided above.

Institutions must also report statistics for hate crimes in connection with the following offenses which are not otherwise included in the annual crime statistics:

Larceny: the unlawful taking, carrying, leading or riding away of property from the possession or constructive possession of another. (Larceny and theft mean the same thing in the UCR.) Constructive possession is the condition in which a person does not have physical custody or possession but is in a position to exercise dominion or control over a thing.

Simple Assault: an unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.

Intimidation: to unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack.

Destruction/Damage/Vandalism of Property: to willfully or maliciously destroy, damage, deface, or otherwise injure real or personal property without the consent of the owner or the person having custody or control of it.

Types of Bias reportable under the Clery Act:

- **Race:** A preformed negative attitude toward a group of persons who possess common physical characteristics, e.g., color of skin, eyes, and/or hair; facial features, etc., genetically transmitted by descent and heredity which distinguish them as a distinct division of humankind, e.g., Asians, blacks or African Americans, whites.

- **Religion:** A preformed negative opinion or attitude toward a group of persons who share the same religious beliefs regarding the origin and purpose of the universe and the existence or nonexistence of a supreme being, e.g., Catholics, Jews, Protestants, atheists.

- **Sexual Orientation:** A preformed negative opinion or attitude toward a group of persons based on their actual or perceived sexual orientation.

- **Gender:** A preformed negative opinion or attitude toward a person or group of persons based on their actual or perceived gender, e.g., male or female.

- **Gender Identity:** A preformed negative opinion or attitude toward a person or group of persons based on their actual or perceived gender identity, e.g., bias against transgender or gender non- conforming individuals.

- **Ethnicity:** A preformed negative opinion or attitude toward a group of people whose members identify with each other, through a common heritage, often consisting of a common language, common culture (often including a shared religion) and/or ideology that stresses common ancestry.

- **National Origin:** A preformed negative opinion or attitude toward a group of people based on their actual or perceived country of birth.

- **Disability:** A preformed negative opinion or attitude toward a group of persons based on their physical or mental impairments, whether such disability is temporary or permanent, congenital or acquired by heredity, accident, injury, advanced age or illness.

APPENDIX B – Crime Prevention Tips

While Webster University and campus administrators make every effort to provide a safe campus, students, faculty, and staff must also do their part to help us maintain a safe environment. To this end, Webster University encourages all individuals who attend, work or visit the campus and satellite campuses to follow basic personal and property crime prevention procedures for yourself and for those around you. Please review the following tips on preventing crime and keeping yourself and your property safe and secure.

Tips for Securing Valuables in an Office

- Always lock your office, even when you are away for a few minutes.
- If you have valuables stored in your office, do not leave them overnight.
- Never leave purses or other valuables unattended. Take them with you or lock them in a secure cabinet.
- Keep your desk and files locked when you are away.
- Never store money in your desk drawers or file cabinets
- Report all losses to your Campus Director immediately.

Tips for Securing Valuables in Residences

Conspicuously mark items of value with a unique identifier making the items more difficult to sell and making it easier for law enforcement officials to return lost or stolen property.

Personal Safety Tips

- When walking alone after dark, walk on well-lighted, well-traveled walkways and plan your route ahead of time. Avoid places where attackers might hide (spaces between parked cars, overgrown shrubs, and dark passageways) and areas where you might get cornered. Remember that it is best to walk facing traffic.
- If anyone follows you while you are walking alone, look confident and let him or her know you are aware of their presence. Don't be polite or engage in conversation. If they continue to follow you, cross the street and/or change directions. If this doesn't work, walk toward other people or occupied buildings and stay away from places where you might get cornered.
- If you are trapped in your car and afraid for your safety, honk your horn in quick short bursts. This will attract people's attention.
- Make sure that all of the car doors are locked whenever you leave your vehicle.
- When returning to your car, have your keys ready so you can enter your car quickly and be aware of your surroundings. If you have to look into a purse or a pocket to find them, it takes

extra time and you lose sight of what is around you, which could allow someone to sneak up on you.

Preventing Thefts from Vehicles

- Install a vehicle alarm or mechanical lock for the steering wheel origination.
- Always lock the doors and leave the windows rolled up.
- Keep valuables out of sight. Place valuable items in your trunk not the front or back seats.
- Know the license number, year, make and model of your vehicle.
- Never leave money, checkbooks, or credit cards in the vehicle at any time.

Preventing Bicycle Theft

Keep bicycles locked any time they are unattended. Be sure the lock or cable goes through the front wheel, rear wheel and the frame, and secure wheel and the frame, and secure it to a fixed object.

APPENDIX C – Applicable Austrian Law

Section 177 Sexual Coercion; Rape

(1) Whoever coerces another person:
   1. with force;
   2. by a threat of imminent danger to life or limb; or
   3. by exploiting a situation in which the victim is unprotected and at the mercy of the perpetrator's influence, to suffer the commission of sexual acts of the perpetrator or a third person on himself or to commit them on the perpetrator or a third person, shall be punished with imprisonment for not less than one year.

(2) In especially serious cases the punishment shall be imprisonment for not less than two years. An especially serious case exists, as a rule, if:
   1. the perpetrator completes an act of sexual intercourse with the victim or commits similar sexual acts on the victim, or allows them to be committed on himself by the victim, which especially degrade the latter, especially if they are combined with penetration of the body (rape); or
   2. the act is committed jointly by more than one person.

(3) Imprisonment for not less than three years shall be imposed, if the perpetrator:
   1. carries a weapon or another dangerous tool;
   2. otherwise carries a tool or means in order to prevent or overcome the resistance of another person through force or threat of force; or
   3. places the victim by the act in danger of serious health damage.

(4) Imprisonment for not less than five years shall be imposed, if
   1. the perpetrator uses a weapon or another dangerous tool during the act; or
   2. the perpetrator: a) seriously physically maltreats the victim through the act; or
   3. b) places the victim in danger of death through the act.

(5) In less serious cases under subsection (1), imprisonment from six months to five years shall be imposed, in less serious cases under subsections (3) and (4), imprisonment from one year to ten years.

Section 179 Sexual Abuse of Persons Incapable of Resisting

(1) Whoever abuses another person who is incapable of resisting:
   1. because of a mental or emotional illness or disability, including an addiction or because of a profound consciousness disorder; or
   2. physically, in that he, by exploiting the incapability of resisting, commits sexual acts on the person, or allows them to be committed on himself by the person, shall be punished with imprisonment from six months to ten years.

(2) Whoever abuses a person incapable of resisting (subsection (1)), in that he induces the person, by exploiting the incapability of resisting, to commit sexual acts on a third person, or to allow them to be committed on the person by a third person, shall be similarly punished.

(3) An attempt shall be punishable.

(4) Imprisonment for no less than one year shall be imposed, if:
   1. the perpetrator completes an act of sexual intercourse or similar sexual acts with the victim, which are combined with a penetration of the body, or allows them to be committed on himself by the victim.
   2. the act is committed jointly by more than one person: or

3. by the act the perpetrator places the victim in danger of serious health damage or substantial impairment of his physical or emotional development.

(5) In less serious cases under subsections (1), 2 and 4, imprisonment from three months to five years shall be imposed.

Sections 176a subsection (4), and 176b shall apply correspondingly.

Section 176 Sexual Abuse of Children

(1) Whoever commits sexual acts on a person under fourteen years of age (a child) or allows them to be committed on himself by the child, shall be punished with imprisonment from six months to ten years, and in less serious cases with imprisonment for not more than five years or a fine.

(2) Whoever induces a child to commit sexual acts on a third person, or to have them committed on the child by a third person, shall be similarly punished.

(3) Whoever:
1. commits sexual acts in front of a child.
2. induces the child to commit sexual acts on his own body; or
3. exerts influence on a child by showing him pornographic illustrations or images, by playing him audio recording media with pornographic content or by corresponding speech, shall be punished with imprisonment for not more than five years or a fine.

(4) An attempt shall be punishable; this shall not apply for acts under subsection (3), number 3

Section 176a Serious Sexual Abuse of Children

(1) The sexual abuse of children shall be punished with imprisonment for no less than one year in cases under Section 176 subsections (1) and (2), if:
1. a person over eighteen years of age completes an act of sexual intercourse or similar sexual acts with the child, which are combined with a penetration of the body, or allows them to be committed on himself by the child.
2. the act is committed jointly by more than one person.
3. the perpetrator by the act places the child in danger of serious health damage or substantial impairment of his physical or emotional development; or
4. the perpetrator has undergone a final judgment of conviction for such a crime within the previous five years.

(2) Whoever, in cases under Section 176 subsections (1) to (4), acts as a perpetrator or other participant with the intent of making the act the object of a pornographic writing (Section 11 subsection (3)), which is to be disseminated pursuant to Section 184 subsections (3) or (4), shall be punished with imprisonment for not less than two years.

(3) In less serious cases under subsection (1), imprisonment from three months to five years shall be imposed, in less serious cases under subsection (2), imprisonment from one year to ten years.

(4) Whoever, in cases under Section 176 subsections (1) and (2):
1. by the act seriously physically maltreats the child; or
2. by the act places the child in danger of death, shall be punished with imprisonment for not less than five years.

(5) The time in which the perpetrator is in custody in an institution pursuant to order of a public authority shall not be credited to the term indicated in subsection (1), number 4.

4. An act as to which judgment was rendered abroad shall be deemed equivalent in cases under subsection (1), number 4, to an act as to which judgment was rendered domestically, if under

German criminal law it would have been such an act under Section 176 subsections (1) or (2).

Section 173 Sexual Intercourse between Relatives [Incest]

(1) Whoever completes an act of sexual intercourse with a consanguine descendant shall be punished with imprisonment for not more than three years or a fine.
(2) Whoever completes an act of sexual intercourse with a consanguine relative in an ascending line shall be punished with imprisonment for not more than two years or a fine; this shall also apply if the relationship as a relative has ceased to exist. Consanguine siblings who complete an act of sexual intercourse with each other shall be similarly punished.
(3) Descendants and siblings shall not be punished pursuant to this provision if they were not yet eighteen years of age at the time of the act.

APPENDIX D – Bystander Intervention Tips

The University encourages the campus community to recognize that we all have an opportunity to make a difference and reduce the incidents of sexual misconduct on our campus, by learning how to intervene when we witness a situation that makes us uncomfortable, or we know is wrong. One method of bystander intervention is referred to as the "3 D's - Distract, Delegate, and Direct." Information about how to engage in this method appears below. **IMPORTANT REMINDER**: You should always assess whether you can safely intervene before engaging in any of the techniques described below.

Distract. This technique involves causing some form of distraction that will interrupt the flow of what is happening. Once you identify a high-risk situation you can attempt to distract either of the two individuals.

Examples:

- Ask one of the people to help you find a lost item.
- Interrupt to ask for directions.
- Spill a drink.
- Start talking to the couple and don't leave, so isolation cannot happen.
- An easy technique you can use is to invite the targeted individual to go outside for some fresh air. Once he or she is away from the other person, check in and ask if she or he needs help.

Delegate. When a bystander doesn't feel safe to approach the situation alone, she or he can involve others.

Examples:

- Group intervention. There is power in numbers. If you don't feel comfortable going by yourself, ask a group to go with you. Say to one's friends, I am concerned for that person. Can you find their friends and get them to check on the situation, while I stay here and watch?
- Ask a bouncer at a bar to look into the situation
- Ask the host to intervene. For example, I am worried for that girl, who is so drunk. Could you let that guy know that upstairs is off limits?

Direct. With the direct approach, you confront either the potential target or the person who you think is potentially about to commit a sexual assault.

Examples:

- Say to the couple, "we are finding her friends and they will take her home."
- Say to the targeted individual, "I am not letting a stranger take you home."
- Say to the possible perpetrator, "Hey, you can't take them upstairs; it's not a good idea.