



WEBSTER UNIVERSITY DEPARTMENT OF PUBLIC SAFETY

2025 Annual Security and Fire Safety Report Webster Groves

Containing Crime and Fire Statistics for 2022, 2023, 2024



Webster University 2025 Annual Security and Fire Safety Report Webster Groves Campus

QUICK REFERENCE RESOURCES

Webster University Department of Public Safety

- Emergency 314-246-6911
- Non-emergency 314-246-7430
- Emergency line for Power Failure 314-220-8487
- Campus Safe Walk Service 314-246-7430

City of Webster Groves Police & Fire Department

- Emergency 911
- Non-emergency 314-645-3000



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.**

Student Health & Counseling	
Student Health Services	314-246-4207
Counseling Services	314-968-7030
Sexual Offense Advocate	314-649-8474 (24hours/day)

University Title IX Coordinator	
University Title IX Coordinator	314-246-7780

Other Campus Resources	
Information on Inclement Weather	314-968-6900
Dean of Students Office	314-968-6980
Housing & Residential Life	314-246-4663
Academic Resource Center	314-246-7620
Financial Aid Office	314-968-6992
Immigration/Visa Information	314-246-7860
ID Cards/Parking/Lost & Found	314-246-7430

WEBSTER UNIVERSITY 2025 ANNUAL SECURITY AND FIRE SAFETY REPORT WEBSTER GROVES CAMPUS	2
QUICK REFERENCE RESOURCES	2
Webster University Department of Public Safety	2
City of Webster Groves Police & Fire Department	2
Webster Alert System	2
WEBSTER GROVES CAMPUS CRIME STATISTICS	8
2022-2024 Crime Statistics	8
On-Campus	8
On-Campus Student Housing Facilities	8
Public Property	8
Non-Campus Buildings or Property	8
Criminal Offenses	9
Hate Crimes	9
VAWA Offenses	9
Arrests and Referrals for Disciplinary Action	9
Criminal Offenses Reporting Table 2022 2023 2024 (Webster Groves Campus):	9
Caveat	9
VAWA Offenses Reporting Table (Webster Groves Campus):	10
Arrests and Disciplinary Referrals Reporting Table (Webster Groves Campus):	10
Hate Crimes	10
Unfounded Crimes	10
Webster University's Daily Crime Log	11
Preparing the Annual Disclosure of Crime Statistics	11
WEBSTER UNIVERSITY DEPARTMENT OF PUBLIC SAFETY	12
About Webster University's Department of Public Safety	12
Department of Public Safety Jurisdiction and Enforcement Authority	12
Reporting Criminal or Suspicious Activity and Emergencies	13
Contacting DPS	13
Crimes can be reported to the following office on campus:	13
Victims of sexual violence, dating violence, domestic violence and stalking are encouraged to report to the Office for civil Rights Compliance:	14
If reporting parties are not comfortable reporting to Public Safety, they are encouraged to report to the following Campus Security Authorities:	14
Pastoral and Professional Counselors	14
Higher Education Opportunity Act Victim Notification	15
Webster Alerts Mass Notification System	15
Timely Warning Policies and Procedures	16
What Are Timely Warnings?	16
When Are Timely Warnings Issued?	16
What Is Included in a Timely Warning?	16
How Are Timely Warnings Issued?	17
Updates to Timely Warnings	17
Campus Safety Advisories	17
Security Awareness & Crime Prevention Programs	17
Safety and Crime Prevention Programs	18
Monitoring and Recording of Criminal Activity at Non-Campus Locations	18
EMERGENCY RESPONSE AND EVACUATION	19
Immediate Emergency Response Procedures	19
Evacuation Procedures	19

Shelter-in-Place Procedures	20
<i>What It Means to “Shelter-in-Place”</i>	20
<i>How to “Shelter-in-Place”</i>	20
Emergency Notifications Policies & Procedures	21
<i>What Are Emergency Notifications?</i>	21
<i>When Are Emergency Notifications Issued?</i>	21
<i>What Is Included in an Emergency Notification?</i>	21
<i>How Are Emergency Notifications Issued?</i>	22
Communicating Emergency Notifications to the Larger Community	23
Follow Up Information Regarding Campus Emergencies	23
<i>Publication & Tests of Emergency Response and Evacuation Procedures</i>	23

CAMPUS SECURITY AND ACCESS CONTROL 25

Security Measures	25
Access Control.....	26
Access to Residential Facilities.....	26
Guest/Visitor Procedures for On Campus Student Housing Facilities	27
Alcohol and Drug Policy & Education Programs.....	27
University Alcohol Policy	28
University Drug Policy	28
University Hazing Policy	29
Drug and Alcohol-Abuse Education Programs	29
<i>New Student Orientation Programs</i>	29
<i>Counseling/Life Development</i>	29
<i>Office of Student Engagement</i>	30
<i>Housing & Residential Life</i>	30
<i>Student Affairs</i>	30
<i>Dean of Students Office</i>	30
<i>Title IX</i>	30
<i>Human Resources</i>	30

MISSING STUDENT PROCEDURES 31

How to Report a Missing Student	31
Confidential Contact Person for Residents	31
Missing Student Notification Procedures for Residents.....	31

POLICIES AND PROCEDURES RELATED TO SEXUAL ASSAULT, DATING VIOLENCE, DOMESTIC VIOLENCE, AND STALKING..... 32

Policy on Sex Discrimination, Including Sexual Harassment	32
<i>Dating Violence</i>	32
<i>Domestic Violence</i>	32
<i>Stalking</i>	33
<i>Sexual Assault</i>	33
<i>Rape</i>	33
<i>Criminal Sexual Contact</i>	33
<i>Incest</i>	33
<i>Statutory Rape</i>	33
Procedures Victims Should Follow if a Crime of Domestic Violence, Dating Violence, Sexual Assault or Stalking has Occurred.	34
Webster University’s Title IX Team	34
Designated Title IX Coordinator.....	35
Reporting Sexual Assault, Dating Violence, Domestic Violence or Stalking	35
Confidential Reports to the Sexual Offense Advocate.....	35
<i>Reports to the Department of Public Safety</i>	36
<i>Reports to Local Law Enforcement</i>	36
<i>Reports to a Title IX Coordinator or Chief Human Resources Officer</i>	36

<i>Important Information Regarding Confidentiality</i>	36
Other Considerations Regarding Incidents of Sexual Assault, Dating Violence, Domestic Violence or Stalking	37
<i>Seeking Prompt Medical Attention</i>	37
<i>Preserving Evidence</i>	38
<i>Preserving Physical Evidence through a Forensic Exam</i>	38
<i>Preserving Other Forms of Evidence</i>	38
<i>Amnesty from University Drug and Alcohol Policy</i>	38
<i>University Response to Reports of Sexual Assault, Dating Violence, Domestic Violence or Stalking</i>	39
Orders of Protection.....	41
Accommodations and Interim Protective Measures.....	42
On Campus Resources Available to Parties Reporting Sexual Assault, Dating Violence, Domestic Violence or Stalking	42
<i>Counseling & Mental Health Services</i>	42
<i>Health Services</i>	43
<i>Victim Advocacy Services</i>	43
<i>Legal Assistance</i>	43
<i>Visa & Immigration Assistance</i>	43
<i>Student Financial Aid</i>	43
<i>Additional Services</i>	43
Community Resources Available to Parties Reporting Sexual Assault, Dating Violence, Domestic Violence or Stalking	43
<i>Counseling</i>	43
<i>Mental Health</i>	43
General Information Regarding Institutional Disciplinary Proceedings Related to Reports of Sexual Assault, Dating Violence, Domestic Violence or Stalking	44
Timeframe for Disciplinary Proceedings.....	45
Officials Conducting Disciplinary Proceedings.....	45
Notifications to Reporting and Responding Parties.....	45
Standard of Evidence.....	46
Sanctions.....	46
University Disciplinary Processes	46

TITLE IX POLICY ON SEX DISCRIMINATION, INCLUDING SEXUAL HARASSMENT 47

I. PURPOSE	47
II. SEX DISCRIMINATION, INCLUDING SEXUAL HARASSMENT	47
III. RETALIATION.....	49
IV. CONFIDENTIALITY	50
V. SUPPORTIVE MEASURES.....	50
VI. COMPLAINT, INVESTIGATION AND GRIEVANCE PROCEDURES	51
VII. VIOLATIONS OF LAW	64
VIII. TITLE IX STAFF	65
<i>Title IX Coordinator</i>	65
<i>Civil Rights & Title IX Investigator</i>	65
<i>Sexual Offense Advocate (24/7)</i>	65
<i>Office of Public Safety (24/7)</i>	65
IX. ACADEMIC FREEDOM	66

APPENDIX A: TITLE IX SEXUAL ASSAULT PREVENTION AND EDUCATION RESOURCES 67

Legal Assistance	67
Financial Aid.....	67
Visa and Immigration Services	67
The Sexual Offense Advocate.....	67
Sexual Offense Support Groups	67
The Wellness Center.....	68
Employee Resources	68
Community Resources.....	68

ALIVE.....	68
1 in 6	68
Safe Connections	68
Prevention and Education Resources.....	69

APPENDIX B: TITLE IX..... 70

Contact Information for Policy Violations Related to Sexual Harassment.....	70
Sexual Offense Advocate (24/7).....	70
Office of Public Safety (24/7).....	70
Kimberley Bynum-Smith.....	70
Charles Burton.....	70
Policy Regarding Educational Programs and Campaigns to Prevent Dating Violence Domestic Violence, Stalking and Sexual Assault.....	70
Bystander Intervention	71
Risk Reduction	71
Primary Prevention and Awareness Programs.....	72
Primary Prevention and Awareness Programs Offered in 2024:.....	72
Ongoing Prevention and Awareness Campaigns	72
Ongoing Prevention and Awareness Programming Offered in 2024: Ongoing Prevention/Awareness Programming for Students/Employees.....	73
Missouri Sex Offender Registry.....	77

WEBSTER GROVES CAMPUS ANNUAL FIRE SAFETY REPORT..... 78

Explanation of the 2022-2024 Fire Statistics Reporting Tables	78
2024 Fire Statistics for On-Campus Student Housing Facilities.....	79
2023 Fire Statistics for On-Campus Student Housing Facilities.....	80
2022 Fire Statistics for On-Campus Student Housing Facilities.....	81
Fire Log.....	81

FIRE SAFETY POLICIES AND PROCEDURES..... 82

How to Report a Fire to the University	82
General Procedures to Follow in Case of Fire	82
Procedures for Evacuating Student Housing Facilities in Case of Fire	83
Current Student Housing Facilities Fire Safety Systems	84
Fire Safety Policies for Student Housing Facilities.....	86
Appliances.....	87
Candles, Incense, Open Flames.....	87
Fire Safety Education and Training Programs	87

APPENDIX C – CLERY ACT CRIME DEFINITIONS..... 88

Murder/Non-Negligent Manslaughter	88
Manslaughter by Negligence.....	88
Sexual Assault.....	88
Robbery	88
Aggravated Assault.....	88
Burglary	88
Motor Vehicle Theft.....	88
Arson.....	88
Dating Violence	88
Domestic violence.....	89
Stalking.....	89
Weapons.....	89
Drug Abuse Violations.....	89
Liquor Law Violations.....	89
Hate Crimes.....	90
Types of Bias reportable under the Clery Act:.....	90

Race.....	90
Religion.....	90
Sexual Orientation	90
Gender.....	90
Gender Identity	90
Ethnicity.....	91
National Origin	91
Disability.....	91
Hazing.....	91

APPENDIX D – CRIME PREVENTION TIPS..... 92

Tips for Securing Valuables in an Office	92
Tips for Securing Valuables in Residences	92
Personal Safety Tips	92
Preventing Thefts from Vehicles	92
Preventing Bicycle Theft	92

APPENDIX E – MISSOURI STATUTES..... 93

556.061. Code definitions. [Preliminary Provisions (Criminal Code)].....	93
566.010. Chapter 566 and chapter 568 definitions. —.....	93
566.023. Marriage to victim, at time of offense, affirmative defense, for certain offenses. —	94
566.030. Rape in the first degree, penalties—suspended sentences not granted, when. —	94
566.031. Rape in the second degree, penalties. —	95
566.060 Sodomy in the first degree, penalties—suspended sentence not granted, when. —	95
566.61 Sodomy in the second degree, penalty. —	95
566.062 Statutory sodomy and attempt to commit, first degree, penalties. —	95
566.064. Statutory sodomy, second degree, penalty. —	96
566.067 Child molestation, first degree, penalties. —	96
566.068 Child molestation, second degree, penalties. —	96
566.069 Child molestation, third degree, penalty. —	96
566.071. Child molestation, fourth degree, penalty. —	96
566.100. Sexual abuse in the first degree, penalties. —	96
566.101. Sexual abuse, second degree, penalties. —	97
566.020. Mistake as to age—consent not a defense, when. —	97
566.032. Statutory rape and attempt to commit, first degree, penalties. —	97
566.034. Statutory rape, second degree, penalty. —	97
568.020. Incest — penalty. —.....	97
455.010. Definitions. [Abuse—Adults and Children—Shelters and Protective Orders Adult Abuse]	98
455.020. Relief may be sought — order of protection effective, where. —	99
565.072 Domestic assault, first degree—penalty.....	99
565.73 Domestic assault, second degree—penalty.....	99
565.74 Domestic assault, third degree—penalty.....	99
565.76 Domestic assault in the fourth degree, penalty.....	100
565.225. Stalking, first degree, penalty.....	100
565.227. Stalking, second degree, penalty.....	101
<u>578.365. Hazing — consent not a defense — penalties.....</u>	<u>101</u>

APPENDIX F – BYSTANDER INTERVENTION TIPS..... 102

APPENDIX E – FIRE SAFETY TIPS..... 103

APPENDIX F – RISK REDUCTION TIPS 104

WEBSTER GROVES CAMPUS CRIME STATISTICS

This section of the Annual Security and Fire Safety 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. Reporting tables are provided which include crime statistics for the calendar years 2022-2024.

The statistics included in the Annual Security and Fire Safety 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 Student Affairs, Housing & 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 the University's Clery reportable geography.

2022-2024 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 Crimes²) which were reported to have occurred in certain property owned or controlled by the institution. Specifically, institutions must publish statistics for Clery Act Crimes which occurred on any of following locations:

On-Campus

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 any building or property that is within or reasonably contiguous to the area identified in paragraph 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 recognized student organizations own or control any property.*

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.

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, Criminal Sexual Contact, 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.

Criminal Offenses Reporting Table 2022 2023 2024 (Webster Groves Campus):

Offense	On-Campus Property			On-campus Student Housing Facilities			Non-Campus Property			Public Property		
	2022	2023	2024	2022	2023	2024	2022	2023	2024	2022	2023	2024
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	5	1	2	4	1	2	0	0	0	0	0	0
Criminal Sexual Contact	3	3	0	2	2	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	1	0	0	1	0	0	0	0	0	0
Aggravated Assault	3	0	0	2	0	0	0	0	0	0	0	0
Burglary	2	4	2	1	2	0	0	0	0	0	0	0
Motor Vehicle Theft	1	7	1	1	0	0	0	2	1	0	0	0
Arson	0	1	0	1	1	0	0	0	0	0	0	0

Caveat

From May-December 2022 the St Louis region had an increase of Motor Vehicle theft.

VAWA Offenses Reporting Table (Webster Groves Campus):

Offense	On-Campus Property			On-campus Student Housing Facilities			Non-Campus Property			Public Property		
	2022	2023	2024	2022	2023	2024	2022	2023	2024	2022	2023	2024
Domestic Violence	1	0	0	1	0	0	0	0	0	0	0	0
Dating Violence	1	1	3	1	1	3	0	0	0	0	0	0
Stalking	3	8	4	3	2	1	0	0	0	0	0	0

Arrests and Disciplinary Referrals Reporting Table (Webster Groves Campus):

Offense	On-Campus Property			On-campus Student Housing Facilities			Non-Campus Property			Public Property		
	2022	2023	2024	2022	2023	2024	2022	2023	2024	2022	2023	2024
Arrests: Weapons: Carrying, Possessing, Etc.	0	0	0	0	0	0	0	0	0	0	0	0
Disciplinary Referrals: Weapons: Carrying, Possessing, Etc.	3	3	0	0	3	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	11	21	7	11	19	7	0	0	0	0	0	0
Arrests: Liquor Law Violations	0	1	1	0	0	0	0	0	0	0	0	0
Disciplinary Referrals: Liquor Law Violations	25	10	9	25	10	9	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.

2024: One case of vandalism motivated by sexual orientation was reported on campus. One case of intimidation motivated by sexual orientation was reported on campus.

2023: One case of vandalism motivated by sexual orientation was reported on campus.

2022: One case of intimidation motivated by religion and ethnicity was reported at a non-campus property.

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 2022, 2023, or 2024.

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 DPS. The Crime Log records, by the date the incident was reported to DPS, certain information on all alleged criminal incidents (not just Clery Act Crimes) which occurred on Clery Act Geography. The Crime Log does not include other DPS activity 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 in the DPS office at 572 Garden Avenue, St. Louis, MO 63119, 24 hours a day, seven days a week, 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.

Preparing the Annual Disclosure of Crime Statistics

The procedures for preparing the annual disclosure of crime statistics include reporting statistics to the University community obtained from the following sources: Webster University DPS, local law enforcement, and Campus Security Authorities. For statistical purposes, crime statistics reported to any of these sources are recorded in the calendar year in which the crime was reported. A written request for statistics is made on an annual basis to all Campus Security Authorities and local law enforcement.

All of the statistics are gathered, compiled, and reported to the University community via this report, which is published by Webster University DPS and the university's Clery Compliance Officer. The university's Clery Compliance Officer submits the annual crime statistics published in this brochure to the Department of Education, which is available on their website.

WEBSTER UNIVERSITY DEPARTMENT OF PUBLIC SAFETY

This section of the Annual Security and Fire Safety Report includes information about Webster University's Department of Public Safety, how to report crimes or suspicious activity to the Department of Public Safety, and how the Department of Public Safety 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 dedicated to providing protective and safety services to the campus community. DPS is a member of the University's Finance and Administration division, and reports to the Vice President & CFO. The Office of Public Safety is located at 572 Garden Avenue on the ground level of the parking garage and is open 24 hours a day, 7 days a week.

DPS is led by Interim Director David Heil who has over 25 years of Security experience. Heil has been with the Department of Public Safety since the year 2000. DPS is staffed by communication dispatchers and licensed security officers who work three overlapping shifts providing coverage 24 hours a day, seven days a week. All these officers undergo annual training and a criminal background check conducted by the St. Louis County Police Department in connection with their annual licensure. All officers are also required to participate in the following types of training on an annual basis: CPR/First Aid, Defensive Tactics, Pressure Point Control Tactics, Campus Emergency Response, Clery Act and Title IX. Officers are also given opportunities to participate in additional training courses offered by the St. Louis County Police Department throughout the year. Examples of training courses which DPS officers have participated in during recent years include Cultural Diversity and Incident Report Writing.

DPS operates according to a comprehensive set of procedures which outline how to respond to or investigate serious incidents on campus such as reports of a fire, an active shooter situation, sexual assault, or property crime. Departmental policies also outline general responsibilities and expectations for each member of the Department. Each dispatcher and officer is required to review these procedures when they begin their employment with the Department, and DPS leadership reviews these departmental policies and procedures with the staff throughout the year.

Department of Public Safety Jurisdiction and Enforcement Authority

DPS has jurisdiction over all Webster University owned or controlled property associated with the main campus in Webster Groves, Missouri; and is responsible for enforcing University policy, Missouri state law and federal laws. DPS officers are granted limited power of arrest status on all Webster University property within their jurisdiction. Officers can also make arrests in connection with alleged felonies if reasonable grounds exist that the offense was committed by the person the officer is arresting and the act was committed on university property. Officers are also allowed to conduct searches and seize evidence so long as any search or seizure is in connection with an arrest related to a crime committed on university property. The University has several recognized student organizations, however, none of these organizations own or control any on campus or non-campus buildings or structures.

In addition to providing the above campus security services, DPS oversees the University's parking program – specifically DPS issues parking permits, coordinates parking reservations, and monitors/enforces University parking regulations. DPS also maintains the University's Lost and Found inventory.

DPS does not have any written "memorandum of understanding" (MOU) agreements with local and state law enforcement agencies regarding the investigation of alleged criminal offenses. However, DPS works cooperatively with the Webster Groves Police Department to enhance public safety services and campus

security. DPS also maintains a strong working relationship with the St. Louis County Police Department, Missouri Highway Patrol, and federal authorities.

DPS does hire security officers on contract. The contract security does not have authority to enforce the law but does enforce campus policies and procedures. The security officers do have arrest authority as part of the St Louis County security license. The arrest authority is limited to the campus boundaries.

Reporting Criminal or Suspicious Activity and Emergencies

The University strongly encourages all members of the campus community (as well as visitors) to report any criminal or suspicious activity and emergencies promptly and accurately to DPS 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 DPS so that the Interim Director of DPS, David Heil 314-246-8028, and/ or Dean of Students, John Buck at 314-246-2020, Director of Human Resources, Charles Burton at 314-246-6069, and Director of Civil Rights Compliance and Title IX Kimberley Bynum-Smith at 314-246-7780 can determine whether a Timely Warning¹ needs to be issued to the campus community and consider whether the incident should be included in the annual crime statistics.

DPS also strongly encourages individuals to report any crimes which occur off campus to the appropriate law enforcement agency. While DPS does not have jurisdiction off campus and these crimes are not included in the annual crime statistics,² DPS is always available to assist callers with determining which local law enforcement agency to contact for assistance.

Contacting DPS

Anyone can report criminal action, suspicious activity or other emergencies occurring on campus to DPS by phone or in person 24 hours a day/seven days a week. DPS dispatchers can be reached at (314) 246-7430 (non-emergencies) or (314) 246-6911 (emergencies). Callers can dial 7430 or 6911 from IP telephones located in all on campus buildings. The University also maintains a network of 27 blue light emergency call boxes located in strategic locations throughout the campus which provide instantaneous communication with DPS dispatchers. Individuals can also make reports in person at the Public Safety Office located at 572 Garden Ave. in the Garden Parking Plaza 24 hours a day/7 day a week.

Members of the community are helpful when they immediately report crimes or emergencies to DPS, the Dean of Students, or the Office for Civil Rights Compliance for purposes of including them in the annual statistical disclosure and assessing them for issuing Timely Warning Notices, when deemed necessary.

Crimes can be reported to the following office on campus:

Department of Public Safety
572 Garden Ave
314-246-7430

¹ 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.

² Unless the incident took place on reportable non-campus property as that term is defined by the Department of Education.

Victims of sexual violence, dating violence, domestic violence and stalking are encouraged to report to the Office for civil Rights Compliance:

Kimberley Bynum-Smith
Director, Office for Civil Rights Compliance & Title IX Coordinator
200 Hazel
314-246-7780

If reporting parties are not comfortable reporting to Public Safety, they are encouraged to report to the following Campus Security Authorities:

John Buck
Dean of Students
Student Affairs Office
University Center
314-246-2022

Rachael Amick
Housing & Residential Life Staff
240 Edgar Rd
314-246-2031

Vincent Flewellen
Office of Diversity, Inclusion and Community Engagement
Loretto Hall 363
314-246-8250

Voluntary 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, the Director of Public Safety or designee can file a report without revealing the reporting party's identity.³ The purpose of a confidential report is to comply with a reporting party's desire to keep the matter confidential, while allowing DPS to take the necessary steps to ensure the future safety of the reporting party and campus community. Confidential reports allow DPS 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 Department of Public Safety is not available for reports of sexual assault, dating violence, and domestic violence or stalking. As explained in later sections of the Annual Security Report, DPS must share the reporting party's identity with the Title IX Coordinator anytime it 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 details on how to report these types of offenses confidentially.

Pastoral and Professional Counselors

Campus "Pastoral Counselors" and "Professional Counselors," when acting as such, are not considered to be a campus security authority for Clery Act purposes and are not required to report crimes for inclusion in the

³ The only exception is in cases involving a minor, as the University must notify law enforcement pursuant to Missouri law.

annual disclosure of crime statistics. DPS communicates annually with the individuals on campus acting in the role of a licensed pastoral or professional counselors regarding the procedures for Confidential Reporting described above and asks these counselors to inform their clients about voluntary 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.

DPS Response to Reports of Crime or Suspicious Activity

Regardless of how an incident is reported to DPS, the Department will respond by either:

1. Dispatching an officer to meet with the reporting party and document the incident (and investigate as needed), or
2. An officer will contact the reporting party by phone to document the incident.⁴ DPS also has immediate access to the Webster Groves Police Department, the St. Louis County Police Department, and other law enforcement agencies to report crimes and/or ask for emergency assistance. Reporting parties should be aware that reports (and any associated investigation) involving students may be referred by DPS to the Dean of Students Office, Housing & Residential Life, or a Title IX Coordinator for review and possible disciplinary referral depending on the nature of the report. Likewise, reports involving employee's/faculty members may be forwarded by DPS to Human Resources and/or a Title IX Coordinator 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.

Webster Alerts Mass Notification System

Webster University's Webster Alerts system is powered by Rave Alert™, a global leader in higher 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 & Fire Safety 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. These individuals are only signed up to receive alerts for the campus(es) where they attend classes at or are employed. 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

⁴ The type of response will take into consideration the nature of the report and location of the reporting party.

an opportunity to add up to two 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 Interim Director of Public Safety David Heil at 314-246-8028 or davidheil55@webster.edu. Instructions for accessing a Webster Alerts account is provided in new student, faculty and staff orientation materials. Account holders can 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 Public Safety (or designee), 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 occurrences.

When Are Timely Warnings Issued?

The Director of Public Safety (or designee) evaluates each crime reported to DPS on a case-by-case basis to determine whether, based on the facts known at that time, there is an ongoing or serious threat to the 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 Public Safety or designee) – in cases involving sexual assault, they are often reported long after the incident occurred, thus there is no ability to distribute a "timely" warning notice to the community; 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;
- Hazing;
- Other Clery Act Crimes as determined necessary by the Director of Public Safety or designee.

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

What Is Included in a Timely Warning?

Once the Director of Public Safety (or designee) determines that a Campus Safety Alert should be issued to the campus community, he or she will provide the Chief Communications Officer (or designee) with pertinent

information regarding the incident so that he or she can draft the content of the Campus Safety Alert. The Chief Communications Officer (or designee) has primary responsibility for developing the content of the Campus Safety Alert; however, the Director of Public Safety (or designee) is 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 included 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);
- DPS and/or 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 the Webster Groves campus which are registered with Webster Alerts. This will always include every student, faculty, and staff'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 the Webster Groves 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 Chief Communications Officer (or designee) 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) is also authorized to issue Alerts via any of these methods if necessary.

Updates to Timely Warnings

If the Director of Public Safety (or designee) 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 Public Safety (or designee) may choose from time to time to issue notices to the campus community of other types of crimes or crimes which occur near the University but outside of 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 Chief Communications Officer (or designee) may from time to time assist the Director of Public Safety 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. DPS offered numerous security awareness and crime prevention programs during the 2024-2025 academic year. During the 2024-2025 academic year, WU offered approximately 20 crime prevention and security awareness programs. Topics such as personal safety, residence hall safety, drug and alcohol abuse awareness and sexual assault prevention are some of the examples of programs during the prior academic year.

All of the University's crime prevention and security awareness programs were developed and presented by either the Director of Public Safety & Emergency Management, or a DPS supervisor. Some of these programs were specifically created for and presented at events for incoming students and their families, or students who reside on campus. Other programming was created for and marketed to any interested students, faculty and staff.

Safety and Crime Prevention Programs

Crime prevention programming was incorporated into larger events throughout the year including freshman registration days, fall orientation for freshman and transfer students, RA trainings at the beginning of each semester, the University Wellness Fair, and Professional Development Day. After presenting specific programming at each of these events, DPS staff remained available after the program to provide campus community members with an opportunity to ask questions or request additional resources.

Housing & Residential Life Resident Assistants are trained on a variety of safety and crime prevention topics by their own professional staff as well as by DPS. Prior to the start of the fall 2024 semester, Resident Assistants were required to complete training on active shooter situations, campus safety, emergency procedures, and fire safety. Professional and student Housing & Residential Life staff also presented resident students with safety and crime prevention programming and information both in person, via email, and by utilizing bulletin boards in on-campus student housing facilities throughout the 2024-2025 academic year and will continue this type of crime prevention programming during the 2024-2025 academic year. DPS also works collaboratively with other administrative departments on campus to provide relevant safety and crime prevention information to the campus community in connection with special events. The following topics were specifically addressed in one or more of the crime prevention programs offered during the 2024-2025 academic year:

- How to properly secure a personal residence and personal property.
- How to protect personal property from theft.
- The importance of securing vehicles and bikes parked on campus.
- Security devices available for purchase at the DPS office (e.g., personal vaults, steering wheel locks, bicycle locks).
- Where to find/how to use Emergency Call Boxes on campus.
- General principles of "safety in numbers."
- The University's Safe Walk service.
- Safety precautions for buying/selling personal items online (including the option of meeting buyers/sellers at a designated area outside the Public Safety Office for added security).
- Regardless of the specific focus of the programs presented by DPS or Housing & Residential Life, the presentations emphasized the need for participants to be responsible for their own security and safety and the safety of others, 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.**

Monitoring and Recording of Criminal Activity at Non-Campus Locations

Webster University does not have officially recognized student organizations that own or control housing facilities outside of the Webster University core campus. Therefore, local PD is not used to monitor and record criminal activity since there are no Non-campus locations of student organizations.

EMERGENCY RESPONSE AND EVACUATION

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 and Fire Safety Report addresses the University's emergency response and evacuation procedures and explains how the University communicates information about emergencies or dangerous situations on campus to the campus community. Individuals can report emergencies occurring at any Webster University campus by calling Public Safety at (314) 246-7430.

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 and international 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.

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 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, DPS will work collaboratively with the Webster Groves Police and Fire Departments (and any other state or federal law enforcement agency) to respond to, and summon the necessary resources, to mitigate, investigate, and document the emergency or dangerous situation. Even under circumstances where DPS is not taking the lead in responding to the emergency, it is essential that the Department remain an active part of emergency response so that the Director of Public Safety 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 campus community are expected to follow

the instructions of any first responders from DPS 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 DPS at 314-246-6911 or dial 911.

1. Remain calm.
2. Do NOT use elevators. Use the stairs.
3. Assist individuals with physical mobility issues to 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 by securing a safe location near a stairwell, and immediately inform DPS or the responding Fire Department 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 DPS or 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: DPS, Housing & Residential Life Staff members, other University employees, the Webster Groves Police Department 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 DPS 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 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 DPS 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 Public Safety (or designee) 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 Public Safety (or designee) 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 a member of DPS is notified about a potential emergency or dangerous situation on the University's Clery Act Geography, DPS staff will immediately communicate that information to the Director of Public Safety (or designee). The Director of Public Safety (or designee) will then reach out to the appropriate University administrators, DPS personnel, local first responders and/or the National Weather Service 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. The Public Safety staff is responsible for responding to reported emergencies and confirming the existence of an emergency, sometimes in conjunction with campus administrators, local first responders and/or the national weather center. If the Director of Public Safety (or designee) 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 Public Safety (or designee) determines that an Emergency Notification should be issued, the Director will provide the Chief Communications Officer (or designee) with pertinent information regarding the incident so that he or she can draft the content of the Emergency Notification. The Chief Communications Officer has primary responsibility for developing the content and sending Emergency Notifications, however, the Director of Public Safety is also authorized to draft and send 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 addresses¹ associated with the Webster Groves campus which are registered with Webster Alerts; text message alerts to any mobile devices associated with the Webster Groves campus which are registered with Webster Alerts; broadcast announcements through all IP phones located on campus; and alerts posted on the University's official website² and social media pages.

Primary Emergency Notification Methods

System to use	Primary Message Creator	Backup Message Creator	Authority for approving & sending messages	Primary Message Sender/Distributor	Backup Message Sender/Distributor
Blast Email	Chief Communications Officer or designee	Director of Public Safety or designee	President, Director of Public Safety and/or designee or Chief Communications Officer and/or designee	Chief Communications and/or designee	Director of Public Safety and/or designee
Text Message	Chief Communications Officer or designee	Director for Public Relations or designee	President, Director of Public Safety and/or designee or Director for Public Relations	Chief Communications Officer or designee	Director of Public Safety and/or designee
IP Phones	Chief Communications Officer or designee	Director of Public Safety or designee	Both Director of Public Safety or designee and Chief Communications Officer or designee	Chief Communications Officer or designee	Director of Public Safety or designee
University Website/Social Media	Chief Communications Officer or designee	Director of Public Safety or designee	President, Director of Public Safety or designee and Chief Communications Officer or designee	Chief Communications Officer or designee	Director of Public Safety or designee

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; and desktop alerts to any computers on campus which are connected to the University's network. If any of these systems fail or the University deems it appropriate, in person communications may be used.

¹ 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.

² Anytime there is an emergency notification posted to the University's website it will appear in a banner at the top of the page.

Secondary Emergency Notification Methods

System to use	Primary Message Creator	Backup Message Creator	Authority for approving & sending messages	Primary Message Sender/Distributor	Backup Message Sender/Distributor
Digital Signage on Campus	Chief Communications Officer or designee	Director of Public Safety or designee	Both Director of Public Safety or designee and Chief Communications Officer or designee	Chief Communications Officer or designee	Chief Communications Officer or designee
Desktop Alerts	Chief Communications Officer or designee	Director of Public Safety or designee	Both Director of Public Safety or designee and Chief Communications Officer or designee	Chief Communications Officer or designee	Chief Communications Officer or designee

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 (www.webster.edu). The University may also decide on a case-by-case basis to utilize its official Twitter and Facebook pages or provide information directly to local or national media.

Follow Up Information Regarding Campus Emergencies

The Director of Public Safety (or designee) will stay in close contact with appropriate University administrators, DPS personnel, local first responders and/or the National Weather Service as the situation unfolds, so that he or designee 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.

If there is an immediate threat to the health or safety of students or employees occurring on campus, an institution must follow its emergency notification procedures. An institution that follows its emergency notification procedures is not required to issue a timely warning based on the same circumstances: however, the institution must provide adequate follow-up information to the community as needed

Publication & Tests of Emergency Response and Evacuation Procedures

The University publicizes its emergency response and evacuation procedures annually by 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 under the "Crisis Response" heading after you have logged into your account. All Housing & Residential Life staff including student employees are trained annually on the emergency procedures specific to on campus student housing facilities, and general information on what to do in case of an emergency in student housing is available to residents online year-round at <https://www.webster.edu/housing/policies-procedures.php#emergency>. Housing & Residential Life student staff members also present key emergency plan

information to residents after move-in occurs, along with presenting the Public Safety emergency plan website as a resource for residents. In the residence halls, the evacuation protocols and routes are posted on the back of the room doors.

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.

Fire evacuation drills are conducted annually in certain on campus student housing facilities and the University Center each fall in collaboration with the Webster Grove Fire Department. Additional information regarding the fire evacuation drills in on campus student housing facilities is provided in the Fire Safety section of this document. DPS also designates one of its staff members as the Department’s Fire Safety Specialist who is responsible for coordinating routine maintenance and annual testing of all fire safety systems, including those in the on-campus student housing facilities, in collaboration with an outside fire protection company. The Fire Safety Specialist also works with this vendor to perform extensive obstruction testing of all sprinkler systems on campus every five years. DPS works collaboratively with other departments on campus to annually test the University’s IP telephone, and Webster Alerts systems. DPS personnel test the University’s blue light telephones and panic button systems on a weekly basis. The University also conducts annual tabletop exercises involving a different hypothetical emergency or crisis to test its emergency response and evacuation procedures. These tabletop exercises are coordinated by the Director of Public Safety, and members of many different departments from across the University participate each year.

After each the conclusion of each drill or exercise, DPS documents: a description of the drill/exercise, the date/time of the drill/exercise, and whether it was announced or unannounced.

CAMPUS SECURITY AND ACCESS CONTROL

The University understands that 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 and Fire Safety Report address the general security measures, including access to both non-residential and residential facilities on campus, but is not building specific.

Security Measures

DPS is primarily responsible for day-to-day campus security for all the facilities on campus, including student housing. Officers also provide additional security at special events on campus, and DPS staff manages key and card swipe access to University buildings.

The Director and staff of DPS also work closely with other administrative departments throughout the year 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. DPS and its University partners use the following techniques to maximize campus safety and minimize criminal opportunities:

- **24-hour preventative patrols** by DPS officers of all on campus buildings (including student housing facilities) and parking lots, as well as two apartment complexes located close to campus used as student housing facilities. Patrols are performed on foot, on bicycle, and by vehicle – depending on the location and weather.
- **Resident Assistants** also conduct walk-throughs of all residence halls and the Webster Village Apartments twice daily. Members of the HRL leadership team conduct walk-throughs of the Big Bend, and Eden Schultz Hall on a weekly basis. Additionally, student staff members reside in Glen Park and Big Bend apartments to assist with monitoring the area from a resident perspective.
- **Housing & Residential Life Staff** are on call 24/7.
- **Counseling staff from Counseling Services** are on call 24/7.
- **Emergency Blue-Light Telephones** are in parking lots which notify the dispatcher of the caller's location any time they are activated. DPS officers are immediately dispatched to the location of a Blue-Light Telephone any time it is activated regardless of whether there is any communication or not.
- **IP telephones** (included in all buildings and classes on the Webster Groves campus) which can serve as a bullhorn to issue live announcements by University officials to the campus community in case of emergency.
- **Burglar and panic alarms** which are installed in key areas.
- **Closed circuit television** monitoring and recording.
- **Restricted card access** entry system on all buildings on campus.
- **Safe Walk Program** which provides campus community members with an officer to accompany the caller by foot to a location on campus. This service can be requested 24/7/365 by calling DPS by phone or by using one of the Blue-Light Telephones located across campus.
- **Webster University maintains campus facilities and landscaping in a manner that minimizes hazardous and unsafe conditions.** Parking lots and pathways are illuminated with lighting. DPS officers look for malfunctioning lights and door locks, and other unsafe physical conditions while on patrol and report any issues to Facilities for correction. Other members of the University community are also encouraged to report malfunctioning safety equipment or unsafe physical conditions to Facilities Management or DPS.

- **Facilities Services** has a member of their staff on-call for Emergency Maintenance issues each night.
- **The Behavioral Intervention Team (BIT)** is a cross departmental group chaired by the Dean of Students which addresses reports of troubling behavior which could potentially lead to security concerns on campus. The BIT is responsible for assessing reports of troubling behavior by students, faculty, or staff, and implementing interventions that are in the best interest of the University and the individual. The Director of Public Safety and Director of Counseling and Life Development both serve on the BIT. Individuals can request assistance from the BIT by either calling DPS (the emergency number should be used for immediate threats) or calling the Dean of Students Office for issues related to students which do not involve immediate threats. Callers will be asked to provide basic information about the student, how to contact you (in case the BIT Committee has follow-up questions), and for a description of the incident or behaviors that prompted the referral.
- **Rave Guardian App** keeps students connected directly with Public Safety, receiving campus notification, and giving access to resources for safety on campus.

Access Control



Webster University's main campus is comprised of approximately 47 acres in Webster Groves, a historic residential suburb of St. Louis, Missouri. The main campus contains both modern and architecturally significant historic structures that provide the campus community with state of the art academic, administrative, recreational space, and student housing facilities. All university buildings as well as the library and student center are locked 24 hours a day. Certain buildings on campus are also regularly open to the public in the evenings and over weekends for certain activities sponsored by the University or partner organizations which share

space on campus. Access to spaces within buildings may be restricted by key card readers, key locks, or access codes when the building itself is open to the public. DPS is responsible for coordinating the issuance of the necessary access cards, keys and access codes for students, faculty and staff, and authorized visitors. After-hours access to specific spaces such as offices, classrooms, studios, media center, visual arts studios, microcomputer resource center, practice rooms, etc. must be approved by the appropriate faculty or staff. Once approval is granted for after-hours access, DPS will arrange for access for these individuals.

Access to Residential Facilities

On campus student housing facilities consist of four student residence halls and three apartment complexes. Maria Hall is located on the north end of campus at 470 East Lockwood Avenue. East and West Halls are located next to one another on the south end of campus at 230 Hazel Avenue and 240 Edgar Road respectively. Students also have the option to live in the heart of campus in a group of apartments known as the Webster Village Apartments – consisting of six buildings and a Clubhouse located near East and West Halls. These buildings' addresses are 158 Edgar Rd., 200 Edgar Rd., 212 Edgar Rd., 227 Hazel Ave., 163 Hazel Ave., and 520 Garden Ave. Students also have the option of residing at Big Bend Apartments located approximately 8/10 of a mile from the core campus (7857, 7861 and 7865 Big Bend Blvd.) Schultz Hall and Dunhan Hall has been utilized to house students starting January 1, 2024 -December 2024. These apartment complexes and residence hall rooms rented exclusively to Webster University undergraduate and graduate students.



Access to each residence hall is restricted by key card reader 24 hours a day, and by a student FOB for Schultz and Dunhan. HRL staff, DPS staff, and certain facilities employees are able to access the halls using their access cards without the need for specific approval. Any other individual who wishes to access a residence hall must be escorted and checked in by a current resident or HRL staff member. The units in each of the apartment complexes have exterior doors which does not allow for similarly restricted access; however, the guest/visitor procedures for these facilities restricts access to these facilities as explained below.

Guest/Visitor Procedures for On Campus Student Housing Facilities

The following policies and procedures apply to all on-campus student housing facilities, including the Webster Village Apartments and Big Bend Apartments, and are enforced by HRL staff.

In order to provide a safe and secure residential area, residents and their guests are expected to follow the University guest policy and procedure. A resident is defined as a student who is currently assigned a bed space in on campus housing facilities at Webster University. A guest is defined as an individual who is not assigned to the host's residential space and is visiting the host resident.

A resident hosting a guest(s) must always escort his/her guest(s). All guests must be over the age of 17 unless the resident hosting the guest receives prior written approval from his/her Community Director. Guest(s) are expected to abide by University policies and procedures. The resident hosting guests is responsible for the actions of his/her guests. The resident hosting guests may only host three guests at a time.

Guests who stay past 3:00 am are considered overnight guests. Overnight guests may only stay with the approval of the host's roommate. Additionally, overnight guests may stay no more than three consecutive nights and may not stay for more than fourteen nights per semester.

If the residence hall front desk is open, a resident hosting a guest(s) must check in his/her guest(s) with the individual working the front desk.¹ When checking in at the front desk, the guest will need to provide a valid picture ID not including passports. At all other times, guests are expected to have a valid picture ID on their person. Guests may pick up their ID upon checking out with the front desk. If the front desk is closed when the guest seeks to check out, s/he may obtain his/her ID from the Housing & Residential Life office.

The front desk is open in each residence hall during the following hours: West Hall (Primary desk) Monday – Thursday: 6:00pm – 9:00am (the following morning) Friday: 6:00pm – Monday 9:00am. East and Maria Desks are open Monday-Friday 6pm-Midnight, Saturday and Sunday 3pm-midnight.

Willful violations of these guest policies at any of the residence halls or apartment complexes used as student housing facilities may lead to significant disciplinary action for any residents involved and/or prosecution for criminal and/or civil trespass for any involved individuals not affiliated with the University.

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. In compliance with the Drug Free Schools and Communities Act, 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-

¹ As noted above, given the lay out of the apartment complexes. It is not possible to provide a front desk at these student housing facilities, however, all other policies in this section apply equal with equal force to the apartment complexes.

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 and Fire Safety 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. Webster University prohibits the unlawful possession, use and sale of alcoholic beverages on campus. Persons under the age of 21 are prohibited from possessing or consuming alcoholic beverages. DPS, HRL and the Dean of Students Office work collaboratively to enforce these laws. Webster University DPS is primarily responsible for enforcing State underage drinking laws.

The Dean of Students Office and other offices and departments in Student Affairs work together to 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 21 years of age or older may consume alcoholic beverages only in accordance with the Student Code of Conduct and Housing & Residential Life policy described below, or at University sanctioned events. The University prohibits drinking games on campus, whether at events or in residential facilities. While off-campus, students are expected to uphold the policies of the Student Code of Conduct. Behavior occurring off-campus 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 Housing & Residential Life Department's alcohol policy 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 21 years of age or older.

Individuals who are not 21 years of age or older may not possess or consume alcohol. Except for a roommate while in their assigned room with someone who is 21, alcohol may not be in the presence of individuals under 21 years of age. Individuals on campus are not permitted to provide alcohol to individuals under 21 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 drinking games. Collections of alcohol containers are not permitted on campus. Additionally, alcohol may not be consumed in public spaces including, but not limited to, hallways, lounges, parking lots, apartment patios/balconies, or the WVA clubhouse.

Students, faculty or staff in violation of the University's Alcohol Policy are referred to the Dean of Students Office (students) or Human Resources (faculty/staff) and may be referred to the Webster Groves Police Department if they are in violation of Missouri alcohol laws.

University Drug Policy

The possession, use and sale of illegal drugs is prohibited on the University campus and illegal under both Missouri state and federal law. DPS, HRL and the Dean of Students Office work collaboratively to enforce Federal and State laws. Students, faculty or staff in violation of the University's Drug Policy will be referred

to the Dean of Students Office (students) or Human Resources (faculty/staff) and may be referred to the Webster Groves Police Department if they are in violation of Missouri or Federal drug laws.

University Hazing Policy

Hazing, defined as an act that endangers the mental or physical health or safety of a student, or that destroys or removes public or private property, for the purpose of initiation, admission into, affiliation with, or as a condition for continued membership in, a group or organization.

Drug and Alcohol-Abuse Education Programs

Oversight for the University's Alcohol and other Drug Education and Prevention (AOD) program is formally housed within Student Affairs. Dr. Patrick Stack, Director of Counseling/Life Development is a Certified Reciprocal Advanced Alcohol Drug Counselors (CRAADC) and provides leadership and education in this area. 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 are coordinated through the collective efforts of Student Affairs, which includes the key offices of the Dean of Students Office, Counseling/Life Development, Student Health Services, Housing & Residential Life, Multicultural Center and International Student Affairs (MCISA), First-Year Experience Program (FYE), Office of Student Engagement, the University Center, and Campus Dining. Collectively, Student Affairs supports and promotes healthy decision making that leads to 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:

New Student Orientation Programs

Orientation programs contain elements of alcohol and drug education each year. Housing & Residential Life highlights drug and alcohol policy in their orientation session, international student orientation includes coverage of US-based alcohol and drugs policies, and each freshman registration day throughout the summer includes conversations with parents about issues of substance abuse, policies and sanctions associated with policy violations. Orientation of student athletes includes clear, team-by-team expectations of alcohol and drug use with clear consequences if/when violated.

Counseling/Life Development

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 in the following ways:

- Counseling/Life Development provides an online self-evaluation for alcohol that can be accessed worldwide through the counseling/life development website. This evaluation will provide recommendations and resources, including contacting a member of the counseling staff for guidance. Students are also able to take a comprehensive online wellness screening for alcohol drugs provided through the National Wellness Institute (NWI).
- Counseling /Life Development staff provide annual alcohol/drug training for resident assistant staff, including awareness of resources on campus and how to respond to alcohol/drug emergencies. Counseling/Life Development staff also provide training on safe program and party planning for student organizations throughout the year.

- Counseling /Life Development staff supervises Peer Educators who provide passive programming approaches to alcohol and drug awareness. In addition, a series of pamphlet racks across campus provide information specifically about alcohol and drug issues.
- The Director of Counseling /Life Development also provides server training to local businesses near the University's main campus to increase awareness to those serving alcoholic beverages.

Office of Student Engagement

Staff in the Office of Student Engagement provide training on safe program and event planning for student organizations throughout the year.

Housing & Residential Life

- Housing & Residential Life takes a proactive role in both prevention and educating residents about healthy decisions. Residential Life staff members are trained on alcohol/drug issues and conducts educational workshops for residents.
- Housing & Residential Life Staff, along with campus partners like student organizations, Gorloks Aware, Public Safety and Student Affairs staff work together to implement the "Safety Block Party" the weekend before classes start to educate students on Alcohol, drugs, campus and housing policies, and resources. All resident Assistants are required to bring their communities.
- Housing & Residential Life houses conduct officers who work with students through policy violations for those residents who are found in violation of the Alcohol/Drug policy(ies), the conduct officer utilizes a program (EChug) which allows students to examine their behaviors in relation to other college students. Additionally, students can gain knowledge pertaining to the effects of continued usage of these substances.
- Housing & Residential Life staff also create "passive" programmatic efforts to provide students with information pertaining to Drug/Alcohol prevention. This comes in the forms of bulletin boards providing educational items that are posted periodically throughout the year.

Student Affairs

Addresses alcohol and drug-related issues within Webster 101 courses.

Dean of Students Office

The Dean of Students Office partners with other departments to assist with programming efforts as needed.

Title IX

- The effects of alcohol and drug usage are addressed within the University's sexual misconduct prevention programming.
- The role of alcohol and drug usage is included in the training provided to the University's Title IX Office, Title IX Hearing Officers, Title IX Appeal Offices and Panel, and Title IX Advisors.

Human Resources

The Office of Human Resources is required to communicate with all employees regarding drug/alcohol abuse in the workplace.

MISSING STUDENT PROCEDURES

The University understands the importance of moving quickly when the institution receives a report of a missing student and includes specific procedures for handling these reports in its Emergency Operations Plan. These procedures are explained in this section of the Annual Security and Fire Safety Report.

How to Report a Missing Student

If a member of the University community has reason to believe that a student is missing, regardless of whether the student resides in an on-campus student housing facility, he or she should immediately notify DPS at 314-246-7430. DPS will generate a missing person report and initiate an investigation. Any missing student reports received by other departments or officials at the University must be immediately referred to DPS. DPS will work closely with the Dean of Students Office (and Housing & Residential Life staff if the student resides in an on-campus student facility); however, DPS will lead the investigation.

Confidential Contact Person for Residents

Any time a resident check into one of the University's residence halls or on campus apartments, or anytime the resident changes rooms, Housing & Residential Life informs the resident annually about the option to identify one or more confidential contact persons to be notified by the University in the event the student is determined to be missing for more than 24 hours. Residents may make changes or update this contact information at any point throughout their time at Webster University, as there is an online form available to all active (enrolled) students through Housing & Residential Life's online application system. When students are informed of their option to provide a confidential contact, they are advised that their contact information is registered confidentially and is accessible only by authorized campus officials and law enforcement. It will not be disclosed outside of a missing person investigation.

Missing Student Notification Procedures for Residents

Students are advised that, for all missing students, any time that, after investigation, DPS determines that a student who resides in an on-campus student housing facility is missing and has been missing for more than 24 hours the Director of Public Safety (or designee) will notify the Webster Groves Police Department within 24 hours of the determination that the student is missing, unless the Webster Groves Police Department was the entity that made the determination that the student is missing. The Dean of Students Office (or designee) will notify any confidential contact(s). The Director of Public Safety (or designee) is also authorized to contact the confidential contact(s). Students are advised that, in the event that the missing student residing in an on-campus housing facility is under the age of 18 and not emancipated, in addition to notifying the student's confidential contact person (if one has been provided), and the Webster Groves Police Department, the Director of Housing & Residential Life (or designee) students are also advised that Webster University will notify the student's custodial parent or guardian within 24 hours of the determination that the student is missing. The Director of Public Safety is also authorized to contact the student's custodial parent or guardian.

Should DPS investigate and determine that a residential student is missing, contact will be made to the missing person contact, if contact information has been provided, within twenty-four (24) hours of the determination that the student is missing by DPS. If the student is under the age of 18 and is not an emancipated individual, the Director of Housing & Residential Life (or designee) will notify the student's parent or guardian and any other designated contact person within 24 hours. Regardless of whether the student has identified a contact person, is above the age of 18, or is an emancipated minor, DPS will inform the local law enforcement agency with jurisdiction in which the student went missing, that the student is missing within 24 hours.

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

This section of the Annual Security and Fire Safety 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.

Policy on Sex Discrimination, Including Sexual Harassment

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 Policy on Sex Discrimination, Including Sexual Harassment (referred to hereinafter as the "Title IX Policy") describes the University's programs to prevent dating violence, domestic violence, sexual assault, and stalking. The full policy is available at: <https://www.webster.edu/civil-rights/title-ix.php>. The University's 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. ¹These 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.

Domestic Violence

A Felony or misdemeanor crime of violence² 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;

1 Appendix D provides Missouri state law definitions for these crimes. The definitions under Missouri law are not used to classify crimes in the included annual statistics; however, they are provided for education and awareness purposes.

2 The term "crime of violence" is defined by 18 U.S. Code Section 16 as follows: (a) an offense that has as an element of 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.

- 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, Criminal Sexual Contact, 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.

Criminal Sexual Contact

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.

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

The University's Title IX Policy defines Sexual Consent as an "affirmative and willing agreement to engage in a specific form of sexual contact with another person."

The Title IX Policy expands on this definition by explaining that:

Consent requires an outward demonstration, through mutually understandable words or actions, indicating that an individual has voluntarily chosen to engage in a specific form of sexual contact.

Consent cannot be achieved through manipulation, coercion, force or by taking advantage of the incapacitation of another individual.

An individual can withdraw consent at any time prior to or during any form of sexual contact, and when consent is withdrawn during any form of sexual contact, the sexual contact must end immediately.

When the issue of consent is placed in dispute by a complainant or respondent, the University will consider all relevant facts and circumstances, including without limitation (i) the presence or absence of affirmative words or actions indicating a willingness to engage in sexual contact, (ii) whether a reasonable person would have understood the words and acts at issue as expressing consent; and (iii) whether there are any circumstances, known or reasonably apparent to any of the involved parties, demonstrating incapacitation or any other inability to make a voluntary choice to engage in sexual contact.

The Title IX Policy uses the University's definition of consent provided above; however, the Missouri state law definition is provided in Appendix D 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.

Procedures Victims Should Follow if a Crime of Domestic Violence, Dating Violence, Sexual Assault or Stalking has Occurred.

After an incident of sexual assault, dating violence or domestic violence, the victim should consider seeking medical attention as soon as possible at St. Mary's Hospital, 6420 Clayton Rd, Richmond Heights, MO 63117. In Missouri, evidence may be collected even if you chose not to make a report to law enforcement. The hospital will require the victim to provide their name. It is important that a victim of sexual assault not bathe, douche, smoke, change clothing or clean the bed/linen/area where they were assaulted if the offense occurred within the past 96 hours so that evidence may be preserved that may assist in proving that the alleged criminal offense occurred/or is occurring or maybe helpful in obtaining a protection order. In circumstances of sexual assault, if victims do not opt for forensic evidence collection, health care providers can still treat injuries and take steps to address concerns of pregnancy and/or sexually transmitted infections. Victims of sexual assault, domestic violence, stalking, and dating violence are encouraged to also preserve evidence by saving text messages, instant messages, social networking pages, other communications, and keeping pictures, logs or other copies of documents, if they have any, that would be useful to university adjudicators/investigators or police.

Webster University's Title IX Team

Webster University's Title IX Team is led by the University's designated Title IX Coordinator, Kimberley Bynum-Smith. Ms. Bynum-Smith is the person Webster University has designated to ensure Webster complies with Title IX. The Title IX Coordinator's duties include overseeing all Title IX reports of alleged policy violations and identifying and addressing any pattern or systemic problems that arise during the review of such reports of alleged policy violations.

The Title IX Coordinator has ultimate oversight responsibility and works with an investigator who assist in fulfilling the Title IX Coordinator's responsibilities. Members of the Office for Civil Rights Compliance receive training at least on an annual basis related to carrying out their roles and responsibilities. Contact information for Ms. Bynum-Smith appears below.

Designated Title IX Coordinator

Kimberley Bynum-Smith
Director, Office for Civil Rights Compliance & Title IX Coordinator
200 Hazel Ave
St. Louis MO 63119
314-246-7780
kimberleybynumsmith@webster.edu

Reporting Sexual Assault, Dating Violence, Domestic Violence or Stalking

The University offers individuals several reporting options which are outlined below; however, the University strongly encourages reporting to the Sexual Offense Advocate and/or DPS. When contacted first, DPS will automatically contact the Sexual Offense Advocate. The Sexual Offense Advocate and DPS leadership are trained to aid 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 and DPS 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 the Title IX Coordinator 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 Title IX Coordinator.

The Sexual Offense Advocate can be reached 24 hours a day, seven days a week at: 314-649-8474.

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 this policy and provides procedural information and support as needed. The Advocate also works with Public Safety Officers 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 asexual offense may also report the offense directly to Campus Public Safety, the Title IX Coordinator, the Chief Human Resources Officer, or one of the offices listed 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 may designate an alternate to act as representative in the event the Sexual Offense Advocate is unable to perform the duties due to illness or other professional conflicts.
- 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 DPS and/or local law enforcement authorities.

Reports to the Department of Public Safety

Reporting parties also have the option of reporting sexual offenses directly to DPS. DPS can be reached at 314-246-6911 (emergency) or 314-246-7430. As noted above, anytime an individual reports a sexual assault or incident of dating violence, domestic violence or stalking to DPS, DPS will automatically contact the Sexual Offense Advocate, and the incident will be forwarded to the Title IX Coordinator for review regardless of whether the reporting party chooses to participate in a university disciplinary proceeding or pursue criminal charges.

When making a report, the party talk to a DPS officer and provide a written statement about the incident. Depending on the incident, the report will be forwarded to the proper department for follow-up and resources.

Reports to Local Law Enforcement

As noted above, both the Sexual Offense Advocate and DPS 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. Webster Groves Police Department can be reached in cases of emergency by dialing 911 or at the non-emergency number: 314-963-5402.

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 complaint with Webster University simultaneously, however, reporting parties also always have the right to decline to notify law enforcement.

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 for resources directly with the reporting party.

Reports to a Title IX Coordinator or Chief Human Resources Officer

The Sexual Offense Advocate will strongly recommend that all individuals confidentially reporting sexual offenses to the Sexual Offense Advocate file a formal report with the Title IX Coordinator or Chief Human Resources Officer. Individuals also have the option to make reports directly to a Title IX Coordinator or Chief Human Resources Officer. Once reported to the Title IX Coordinator or Chief Human Resources Officer, any necessary interim steps will be taken pursuant to the Title IX Policy. Additionally, such reports will be handled consistent with the University's Title IX Policy regarding investigation, adjudication, and resolution.

Important Information Regarding Confidentiality

This Policy requires the University to keep confidential the identity of any individual who has made a report or complaint of sex discrimination, including any individual who has made a report or filed a formal complaint of sexual harassment, any complainant, any individual who has been reported to be the perpetrator of sex discrimination, any respondent, and any witness, except as may be permitted by the Family Educational Rights and Privacy Act (FERPA) or U.S. Department of Education regulations pursuant to FERPA (34 CFR part 99), as otherwise required by applicable law, or as needed to carry out the purposes of the Title IX

Regulations, including the conduct of any investigation, hearing, or judicial proceeding arising the Title IX Regulations. Of course, where the University is required by applicable law to disclose information in a report or formal complaint of sexual harassment, such disclosures will be made. Nothing in this shall be construed to prohibit a complainant or respondent from freely discussing the details of a report or formal complaint of sexual harassment. **There are only two types of University employees who are not required to forward these types of reports to a Title IX Coordinator: 1) the Sexual Offense Advocate,³ 2) a Professional or Pastoral Counselor⁴ 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 a Title IX Coordinator, 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 include any personally identifying information⁵ 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.

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

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

³ As explained previously, 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 allegedly occur on Clery Act Geography are still included in the University's annual crime statistics and Daily Crime Log, but these statistics never include any personal-identifying information. Sexual assaults reported to the Sexual Offense Advocate may also result in a Timely Warning (Campus Safety Alert); however, Timely Warnings never include information that identifies the reporting party.

⁴ 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, a Title IX Coordinator, or the Department of Public Safety.

⁵ 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)).

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.⁶

St. Mary's Health Center's Emergency Department is located near the Webster Groves campus and its Emergency Department has Sexual Assault Nurse Examiners on staff. St. Mary's is located at 6420 Clayton Rd, Richmond Heights, MO 63117 and the Emergency Department can be reached at (314) 768- 8360. The YWCA also provides a Rape Crisis Hotline (314) 531-7273, which can provide support and resources about sexual assault and forensic exams, including referrals to additional medical providers. Any of the 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 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

The University encourages reporting and seeks to remove any barriers to reporting by making the procedures for reporting transparent and straightforward. The University recognizes that an individual who has been drinking or using drugs at the time of the incident may be hesitant to make a report because of potential consequences for his/her/their own conduct, which may violate other University policies and codes of conduct.

An individual who reports sexual misconduct 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 that 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. This amnesty policy applies to the University's student conduct process as well as related policies applicable to students, faculty, and staff.

⁶ 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."

While the University may waive disciplinary action under its policies related to use of alcohol and drugs as indicated above, it retains the responsibility to report any illegal use of these substances as required by law and will act in compliance with those laws.

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 this 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.

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

The University has procedures in place that serve to be sensitive to victims who report sexual assault, domestic violence, dating violence, and stalking, including informing individuals about their right to file criminal charges as well as the availability of counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid and other services on and/or off campus as well as additional remedies to prevent contact between a reporting party and accused party, such as changes to housing, academic, protective orders, transportation and working situations, if reasonably available. The University will make such accommodations or protective measures, if the victim requests them and if they are reasonably available, regardless of whether or not the reporting party chooses to report the crime to DPS or local law enforcement. Students and employees should contact Director, Office for Civil Rights Compliance & Title IX Coordinator Kimberley Bynum-Smith at 314-246-7780 to request accommodations.

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 parties⁷ 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 disciplinary action.

⁷ The only exception is in cases involving a minor, as the University must notify law enforcement pursuant to Missouri law.

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

Incident Being Reported	Procedure Institution Will Follow
Sexual Assault	• Provide reporting party with access to medical care. • Assess immediate safety needs of reporting party. • Provide reporting party with contact information for local police and assist reporting party with contacting local law enforcement if they request help. • Provide reporting party with referrals to both on and of campus mental health providers. • Assess the need to implement interim or long-term protective measures, if appropriate • Provide information on how to preserve evidence. • Issue a “No Contact” directive to accused party if deemed appropriate. • Provide instructions on how to apply for a Protective Order • Provide a copy of the policy applicable to Sexual Assault to the complaint and inform the reporting party regarding the timeframes for inquiry, investigation, and resolution. • Inform the complainant of the outcome of the investigation, whether or not the accused will be charged, and what the outcome of the hearing is. • Enforce the anti-retaliation policy and take immediate and separate action against parties that retaliate against a person for complaining of a sex-based discrimination or for assisting in the investigation.
Stalking	• Assess immediate safety needs of reporting party. • Provide contact information for local police and assist reporting party with contacting local request if they request help. • Provide instructions on how to apply for a Protective Order • Provide information to reporting party on how to preserve evidence. • Provide a copy of the applicable University Policy as it pertains to stalking and inform the reporting party regarding the timeframes of inquiry, investigation and resolution. • Assess the need to implement interim or long-term protective measures to protect the reporting party, if applicable • Provide a “No Contact” directive to the accused party if deemed appropriate • Provide a “No Contact” directive to the accused party if deemed appropriate
Dating Violence	• Assess the immediate safety needs of the reporting party • Provide reporting party with contact information for local police and assist the reporting party with contacting local law enforcement if they request help • Provide instruction on how to apply for a Protective Order • Provide information on how to preserve evidence • Provide a copy of the applicable University Policy as it pertains to dating violence and inform the reporting party regarding the timeframes of inquiry, investigation, and resolution • Assess the need to implement interim or long-term protective measures to protect the reporting party, if deemed appropriate • Provide a “No Contact” directive to the accused party if deemed appropriate • Provide a “No Contact” directive to the accused party if deemed appropriate
Domestic Violence	• Assess the immediate safety needs of reporting party • Provide reporting party with contact information for local police and assist reporting party with contacting local law enforcement if they request help • Provide instructions on how to apply for a Protective Order • Provide information on how to preserve evidence • Provide a copy of the applicable University Policy as it pertains to domestic violence and inform the reporting party regarding the timeframes of inquiry, investigation, and resolution • Assess the need to implement interim or long-term protective measures to protect the reporting party, if applicable • Provide a “No Contact” directive to accused party, if deemed appropriate

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.

Anytime a reporting party is referred to the Office for Civil Rights Compliance, the Title IX Coordinator will also provide the reporting party with the same written explanation of rights and options.

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. Certain members of DPS can also assist individuals with obtaining an ex parte order of protection.

Missouri courts issue orders of protection pursuant to the Domestic Violence Act. These orders which restrains a person from abusing, stalking or harassing another person. An order of protection carries criminal penalties for violation and is valid in other states. Missouri Domestic Violence Act (Chapter 455, RSMo).

There are two types of orders of protection: an ex parte order of protection and a full order of protection. An ex parte order of protection is a temporary order issued by a court which remains in effect until a hearing is held. A full order of protection can only be issued after a hearing on the record when the person against whom the order is directed has received notice of the proceedings and has had an opportunity to be heard. Visit <https://www.courts.mo.gov/page.jsp?id=533> for more information on Orders of Protection under Missouri law.

To file for an ex parte Order of Protection in St. Louis County, in which Webster University is located, one of the following conditions must be met: The Reporting Party must reside in St. Louis County, the Responding Party can be served with the order in St. Louis County, or the act of domestic violence must have occurred in St. Louis County.

Members of the Webster University community who receive a lawful order of protection (including ex parte orders) should provide a copy to DPS and to the applicable University appointed Title IX Coordinator. DPS also suggests that individuals with orders of protection meet with DPS 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 is not limited to, escorts and special parking arrangements.

In addition to orders of protection issued by the courts, Webster University may impose a mutual no contact directive. Mutual No Contact directives prohibit 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. Mutual No Contact directives may be issued by the Office for Civil Rights Compliance, the Hearing Officers, and the Appeal Officers.

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, registraroffice@webster.edu.

Accommodations and Interim Protective Measures

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. The Title IX Coordinator is responsible for coordinating the effective implementation of such measures.

These options include counseling, extensions of deadlines or other course-related adjustments, modifications of work or class schedules, campus escort services, mutual restrictions on contact between parties, changes in work or housing locations, leaves of absence, increased security and monitoring of certain areas of the campus, and other similar measures, 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. The Title IX Coordinator reviews options and interim protective measures with the reporting party, and in doing so explains that he or she will limit the information shared with University employees in other campus departments involved in certain accommodations/protective measures (e.g., Housing & Residential Life, Academic Affairs, Human Resources, etc.) The Title IX Coordinator provides the most minimal amount of information possible in order to affect the accommodation/protective measure, and never communicates the reason for the requested accommodation/protective measure to anyone outside of the Title IX Office.

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 listed above, the Advocate also offers individual trauma focused therapy. Contact the Counseling & Life Development office or the Sexual Offense Advocate for additional information on on-campus counseling support by calling 314-968-7030.

Health Services

Student Health Services provides limited health services on campus (e.g., minor first aid), but is available to assist with making referrals to nearby providers. Health Services can be reached at 314-246-4207.

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

Blerina Polovina, Director of International Admission & Services, can assist reporting parties with visa or immigration matters on campus. She can be reached at 314-246- 7860 or by email at kongible@webster.edu.

Student Financial Aid

The Office of Financial Aid can be reached at 314-968-6992 or by email at financialaid@webster.edu.

Additional Services

Reporting parties can always contact the University's Sexual Offense Advocate or a Title IX Coordinator 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 resources in the metropolitan St. Louis region:

Counseling**Victim Advocacy Services**

ALIVE provides counseling, emergency sanctuary, and other critical services to adults and children impacted by domestic abuse. ALIVE also serves the LGBTQ community through the Anti-Violence Advocacy Project (AVAP) which can be accessed through ALIVE's main crisis line.

Mental Health**Victim Advocacy Services**

ALIVE - Alternatives to Living in Violent Environments
(<http://www.alivestl.org/>) 314-993-2777 –available 24 hours/7 days a week.

Victim Advocacy Services

ALIVE provides counseling, emergency sanctuary, and other critical services to adults and children impacted by domestic abuse. ALIVE also serves the LGBTQ community through the Anti-Violence Advocacy Project (AVAP) which can be accessed through ALIVE's main crisis line.

Victim Advocacy Services

YWCA Women's Resource Center
314-531-RAPE (7273) – available 24hours/7 days a week crisis line. YWCA Woman's Place provides immediate and ongoing support for women who have experienced emotional, physical or sexual abuse.

YWCA Woman's Place is unique in being the only non-residential stand-alone drop-in center in the St. Louis region where no appointment is needed and there are no eligibility requirements or fees. All are welcome without regard to age, background, ethnicity or cultural traditions. At YWCA Woman's Place women have the confidential opportunity to assess their situation, experience understanding and encouragement, and access resources helpful to them.

Woman's Place (St. Louis County drop-in center) <https://www.ywcastl.org/what-we-do/womens-crisis-and-housing-services/>

(314) 645-4848

1155 Olivette Executive Parkway St. Louis, MO 63132

Woman's Place (St. Charles location) 4116 McClay
St. Charles, MO 63304

The St. Charles office is located at the Sts. Joachim and Ann Care Service in the Tri-County Outreach Center. The St. Charles office is not a drop-in center so please call for hours. To speak with an advocate, call (636) 373-7911 or (314) 645-4848.

Health Services

SSM St. Mary's Health Center is located at 6420 Clayton Road, Richmond Heights, MO 63117. Their phone number is 314-768-8000. St. Mary's offers confidential forensic examinations by a Sexual Assault Nurse Examiner <https://www.ssmhealth.com/locations/st-louis/st-marys-hospital-st-louis>

The YWCA Rape Crisis Hotline listed above (314-531-RAPE (7273)) can also provide callers with referrals for additional providers for sexual assault and forensic exams.

Visa & Immigration Assistance

The nearest U.S. Citizenship and Immigration Service (USCIS) is located at: Robert A. Young Federal Building, 1222 Spruce St., St. Louis, MO 63103.

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.

Additional Services

St. Louis Domestic and Family Council Resources for Victims of Domestic and Sexual Violence provides valuable information on their website at <https://stlouiscountymo.gov/st-louis-county-departments/human-services/women-and-children-services/domestic-violence-program/>

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. A person may be found responsible for violating more than one section of the Title IX Policy.

Webster is committed to providing prompt, fair, and impartial initial investigation and final resolution of reports of violations under the Title IX Policy, specifically including those reports of domestic violence, dating violence, stalking and sexual assault. 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 by the Title IX Coordinator are handled consistent

with the Title IX 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.

The Title IX 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 party in any meeting or institutional disciplinary proceeding.

Timeframe for Disciplinary Proceedings

The University endeavors to complete the grievance process for a formal complaint within 90 days from the date on which a complainant files, or the Title IX Coordinator signs, the formal complaint through the date on which a decision-maker issues a decision in such case. Further, the Title IX Policy states "The University intends to adhere to the time frames set forth in this Policy whenever possible; however, the University reserves the right to extend the grievance process time frames for good cause, and when exercising that right, will provide written notice to the complainant and the respondent of the delay or extension and the reasons for the action. Good cause may include considerations such as unscheduled breaks and campus closures and may include considerations such as the absence of a party, a party's advisor, or a witness; concurrent law enforcement activity; or the need for language assistance or accommodation of disabilities.

Officials Conducting Disciplinary Proceedings

The University will ensure that all Title IX Coordinators, investigators, decision-makers, and any person who facilitates an informal resolution process, shall receive annual training on the definition of sexual harassment; the scope of the University's education program or activity; the issues related to domestic violence, dating sexual assault, stalking and how to conduct an investigation and grievance process including hearings, appeals, and informal resolution processes that protects the safety of victims and promotes accountability, as applicable; and how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias. The institutional disciplinary procedures will not be conducted by officials who have a conflict of interest for or against the accuser or the accused. The University will also ensure that decision-makers receive training on any technology to be used at a live hearing and on issues of relevance of questions and evidence, including when questions and evidence about the complainant's sexual predisposition or prior sexual behavior are not relevant. The University will ensure that investigators receive training on issues of relevance to create an investigative report that fairly summarizes relevant evidence. Materials used to train the University's Title IX Coordinators, investigators, decision-makers, and any person who will promote impartial investigations and adjudications of formal complaints of sexual harassment.

Notifications to Reporting and Responding Parties

The Title IX Policy states that 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

The standard of evidence to be used to determine responsibility in the processing of a formal complaint is the preponderance of the evidence standard. Notwithstanding the suggestion or mandate to apply, in general, any other evidentiary standard to charges or complaints against faculty or other University personnel, where any respondent is accused of sexual harassment in a formal complaint, the standard of evidence shall be the preponderance of the evidence standard.

Sanctions

In determining sanctions, the Hearing Boards will consider the nature and seriousness of the offense. Sanctions are determined by the Hearing Officer or Appeal Officer and implemented by the Title IX Coordinator. Sanctions for students found responsible for violating the university's Title IX Policy are: Written Warning, Probation, Educational Training, Educational Assignment, No Contact Order, Housing/Campus Life Probation/Suspension/Restrictions (loss of privileges, relocation, eviction), Administrative Hold on Educational Account, Suspension, Expulsion, Withholding of Degree, Revocation of Degree, and Transcript Notation. Sanctions for employees found to have violated the policy are: Warning- Written or Verbal, the implementation of a Performance Improvement Plan, Counseling, Training or Education, Demotion, Loss of Annual Pay Increase, No Contact Order, Suspension with or without Pay, Revocation of Tenure and Termination.

University Disciplinary Processes

This section provides information from the University's Policy on Sex Discrimination, Including Sexual Harassment (Title IX Policy), including the process followed when filing a formal complaint, and the process filed when choosing to use the informal resolution process.

TITLE IX POLICY ON SEX DISCRIMINATION, INCLUDING SEXUAL HARASSMENT

Effective August 15, 2025

I. PURPOSE

The purpose of Webster University's Title IX Policy on Sexual Harassment ("Policy") is to prohibit sexual harassment, as that term is defined under the terms of this Policy and the Department of Education's regulations construing Title IX of the Education Amendments Act of 1972 ("**Title IX**").¹

Webster University ("**University**") is committed to maintaining safe learning, living and working environments free of discrimination, harassment, sexual violence, and other forms of sexual misconduct that undermine the University's educational mission. In pursuit of that goal, this Policy provides the campus community with the appropriate process for reporting and redressing individual reports of sexual harassment.

Of course, the University works to prevent harassment and discrimination of all types from occurring in the programs and activities under the University's control; however, as described in this Policy, the University has made resources available to help members of the University community who experience sexual harassment or sex discrimination.

The provisions contained within this Policy apply to any person participating in, or attempting to participate in, a university program or activity. Other university resources and policies, such as the Student Handbook, Employee Manual, or the Faculty Manual, may govern complaints and subsequent disciplinary actions for allegations of sexual assault, dating violence, domestic violence, and stalking that do not fall under Title IX.

This policy applies to prohibited conduct that occurs:

- on campus;
- within the context of a university program or activity (which includes locations, events, or circumstances in which the University has substantial control over both the Respondent as well as the context in which the sexual harassment occurred); and/or
- any building owned or controlled by a student organization that is officially recognized by the University.

Where the Respondent is a third-party or other non-university affiliated party, the University will offer and implement supportive measures to the complainant consistent with the goals of this Policy, which may include reporting the conduct to law enforcement, as appropriate.

Conduct that occurs outside of the United States is now covered by Human Resources or Student Conduct at those respective campuses.

II. SEX DISCRIMINATION, INCLUDING SEXUAL HARASSMENT

A. Prohibition of Sex Discrimination, Including Sexual Harassment. Consistent with longstanding University policy, regulations published by the U.S. Department of Education under Title IX (see 34 C.F.R. § 106, et seq.) ("Title IX Regulations") prohibit the University from discriminating on the basis of sex in all University educational programs or activities, and this requirement against discrimination extends to admission and employment. The University strictly prohibits sex discrimination, including sexual harassment, in the context of all education programs and activities that the University operates and in University employment relationships and in admission and hiring decisions. The University will promptly

¹ This Policy is intended, and shall be construed, to comply with Title IX and the Title IX Regulations.

and effectively respond to reports of sex discrimination, including sexual harassment, and will take appropriate action to prevent and remediate such behavior.

B. Definition of Sex Discrimination. For purposes of this Policy, sex discrimination (i.e., discrimination on the basis of sex) includes, but is not limited to, pregnancy or related conditions, gender identity, and sexual orientation. (NOTE: Students who wish to file a complaint of sex discrimination on the basis of pregnancy or related condition should refer to Webster University's Policy for Pregnant and Parenting Students.)

C. Definition of Sexual Harassment. Sexual Harassment is a form of sex discrimination; however, complaints of sexual harassment will be handled in accordance with the procedures outlined in this Policy that are unique to sexual harassment claims. For purposes of this Policy, the term "sexual harassment" means conduct on the basis of sex that satisfies one or more of the following:

1. An employee of the University conditioning the provision of an aid, benefit, or service of the University on an individual's participation in unwelcome sexual conduct;
2. Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the University's education program or activity; or

3. any of the following crimes:

a) "**Sexual assault**" refers to an offense that meets the definition of rape, criminal sexual contact (formerly fondling), incest, or statutory rape as used in the FBI's Uniform Crime Reporting System: See 20 U.S.C. § 1092(f)(6)(A)(v).

(1) "**Rape**" is defined as 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 consent of the Complainant, including instances in which the Complainant is incapable of giving consent.

(2) "**Criminal sexual contact**" (formerly fondling) is defined as the touching of the private body parts of another person for the purpose of sexual gratification, forcibly and/or against that person's will or not forcibly or against the person's will in instances where the victim is incapable of giving consent.

(3) "**Incest**" is defined as nonforcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

(4) "**Statutory rape**" is defined as nonforcible sexual intercourse with a person who is under the statutory age of consent.

b) "**Dating violence**" refers to violence committed by a person

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

(2) where the existence of such a relationship shall be determined based on a consideration of the following factors:

(a) The length of the relationship;

(b) The type of relationship;

(c) The frequency of interaction between the persons involved in the relationship.
See 34 U.S.C. § 12291(a)(10).

c) “**Domestic violence**” refers to felony or misdemeanor crimes of violence 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 receiving grant monies, 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. See 34 U.S.C. § 12291(a)(8); or

d) “**Stalking**” refers to engaging in a course of conduct directed at a specific person that would cause a reasonable person to

(1) fear for their safety or the safety of others; or

(2) suffer substantial emotional distress. See 34 U.S.C. § 12291(a)(30).

D. Inquiries about Title IX Requirements. Inquiries about the application of this Policy, Title IX and the Title IX Regulations may be referred to the University’s Title IX Coordinator:

Kimberley Bynum-Smith

Director, Office for Civil Rights Compliance and Title IX Coordinator

200 Hazel, 2nd Floor, St. Louis, MO 63119

314-246-7780

kimberleybynumsmith@webster.edu

E. Interaction with Other University Policies. This Policy addresses sex discrimination. There are other University policies (e.g., the Student Code of Conduct, the Human Resources Grievance Policy, and the Equal Employment Opportunity Commission [EEOC] policy) that address different forms of discrimination and harassment. If the Title IX Coordinator receives a report about misconduct that is not sex discrimination and is therefore not covered by this Policy, the Title IX Coordinator will not adjudicate that complaint. The conduct may be adjudicated by other individuals under the relevant policy(ies).

Individuals who fail to comply with this Policy and the procedures set forth therein may be subject to disciplinary actions guided by the Student Handbook, the Employee Handbook, or the Faculty Manual. Non-compliance with this policy may result in disciplinary action, up to and including separation from the University.

III. RETALIATION

A. Prohibition of Retaliation. The University strictly prohibits retaliation, including intimidation, threats, coercion, or discrimination against any individual for the purpose of interfering with any right or privilege secured by Title IX or the Title IX Regulations, or because the individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under such regulations.

B. Conduct Constituting Retaliation. Intimidation, threats, coercion, or discrimination, including charges against an individual for code of conduct violations that do not involve sex discrimination or sexual harassment, but arise out of the same facts or circumstances as a report or complaint of

sex discrimination, or a report or formal complaint of sexual harassment—if made for the purpose of interfering with any right or privilege secured by Title IX or the Title Regulations—constitutes retaliation.

C. Exceptions

1. The exercise of rights protected under the First Amendment does not constitute retaliation prohibited under this Policy. Likewise, the exercise of academic freedom, which is protected by the First Amendment, does not constitute retaliation under this Policy.
2. Charging an individual with a code of conduct violation or other policy violation for making a materially false statement in bad faith in the course of a grievance proceeding under this Policy does not constitute retaliation prohibited under this Policy; provided, however, that a determination regarding responsibility for violation of this Policy, alone, is not sufficient to conclude that any party made a materially false statement in bad faith.

D. Complaints of Retaliation. Complaints alleging retaliation under this Policy may be filed according to the grievance procedures for sex discrimination, including sexual harassment, that are set forth in this Policy.

E. Penalties for Retaliation. A violation of this Policy may result in disciplinary action. The same range of disciplinary actions that are described in this Policy as available for a finding of sex discrimination, including sexual harassment, can be imposed as result of a finding that prohibited retaliation has occurred.

IV. CONFIDENTIALITY

This Policy requires the University to keep confidential the identity of any individual who has made a report or complaint of sex discrimination, including any individual who has made a report or filed a formal complaint of sexual harassment, any complainant, any individual who has been reported to be the perpetrator of sex discrimination, any respondent, and any witness, except as may be permitted by the Family Educational Rights and Privacy Act (“**FERPA**”) or U.S. Department of Education regulations published pursuant to FERPA (34 CFR part 99), as otherwise required by applicable law, or as needed to carry out the purposes of the Title IX Regulations, including the conduct of any investigation, hearing, or judicial proceeding arising from the Title IX Regulations. Of course, where the University is required by applicable law to disclose information in a report or formal complaint of sexual harassment, such disclosures will be made. Nothing in this Section IV shall be construed to prohibit a complainant or respondent from freely discussing the details of a report or formal complaint of sexual harassment.

V. SUPPORTIVE MEASURES

A. Availability of Supportive Measures. The University shall make available to every complainant and respondent supportive measures as part of the University’s handling of a report of sex discrimination, including reports and formal complaints of sexual harassment. Individuals involved in a complaint of sexual discrimination— whether as a complainant or a respondent—may receive supportive measures by contacting the Title IX Coordinator, who is responsible for coordinating effective implementation of supportive measures. Accommodations or supportive measures are available if the complainant requests them and if they are reasonably available, regardless of whether the complainant chooses to file a formal complaint or report the offense to the Title IX Coordinator, Public Safety, or local law enforcement. Upon request, the Title IX Coordinator will also provide written notification of such resources available to students and employees.

B. Definition of Supportive Measures. The term “supportive measures” means non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the complainant or the respondent. Such measures are designed to restore or preserve equal access to the University’s education program or activity without unreasonably burdening the other party, including measures designed to protect the safety of all parties or the University’s educational environment, or deter sexual harassment.

C. Examples of Supportive Measures. Supportive measures may include any of the following examples: counseling, extensions of deadlines or other course-related adjustments, modifications of work or class schedules, campus escort services, mutual restrictions on contact between the parties, changes in work or housing locations, leaves of absence, increased security and monitoring of certain areas of the campus, and other similar measures.

D. Confidentiality. The University shall maintain as confidential any supportive measures provided to the complainant or respondent, to the extent that maintaining such confidentiality would not impair the University’s ability to provide the supportive measures.

VI. COMPLAINT, INVESTIGATION AND GRIEVANCE PROCEDURES

A. Governing Procedures. Reports and formal complaints of sex discrimination, including sexual harassment, occurring against a person in the United States will be handled in a manner consistent with the procedures set forth in this Section VII of this Policy.¹ These procedures provide for the prompt, fair, and impartial resolution of student and employee complaints alleging any action that would be prohibited by Title IX Regulations. Furthermore, this Policy provides for a grievance process for the handling of formal complaints, as required by the Title IX Regulations.²

B. Definitions. Terms used frequently in these procedures and elsewhere within this Policy are defined as follows:

1. *Actual knowledge.* The term “actual knowledge” means notice of sexual harassment or allegations of sexual harassment to the University’s Title IX Coordinator or to the University’s Chief Human Resources Officer. No employee or official of the University other than the Title IX Coordinator Kimberley Bynum-Smith (200 Hazel, 2nd Floor, St. Louis, MO 63119; Telephone: 314-246-7780; Email: kimberleybynumsmith@webster.edu) and the University’s Chief Human Resources Officer Charles Burton (470 E. Lockwood Ave., St. Louis, MO 63119; Telephone: 314-246-7055; Email: charlesburton@webster.edu) shall have authority to institute corrective measures under this Policy on behalf of the University.
2. *Complainant.* The term “complainant” means an individual who is alleged to be the victim of conduct that could constitute sexual harassment.
3. *Consent.* The term “consent” means an affirmative and willing agreement to engage in a specific form of sexual contact with another person.

a) Consent is Always Required. Sexual contact requires consent. Consent cannot be inferred simply from the absence of a “no” or an explicit rejection of particular sexual contact. Instead,

1 Other University policies, including the University’s policy on Equal Employment Opportunity, govern allegations of misconduct, including sex discrimination, occurring against a person outside of the United States.

2 Employee complaints of sexual harassment that occur off campus will be handled by the University’s Human Resources Department. Student complaints of sexual harassment that occur off campus will be handled by the University’s Student Conduct Office.

a clear and affirmative form of consent, verbal or otherwise, is necessary prior to any sexual contact. Consent to some sexual acts does not constitute consent to others, nor does past consent to a given act constitute present or future consent. Consent must be ongoing throughout any sexual encounter and can be revoked at any time prior to or during any sexual contact.

Consent cannot be obtained from someone who is asleep or otherwise mentally or physically incapacitated, whether due to alcohol, drugs, or some other condition. A person is mentally or physically incapacitated when that person lacks the ability to make or act on considered decisions to engage in sexual activity. A person commits Sexual Assault and violates this Policy by engaging in sexual contact with someone who the person knows, or reasonably should know, is incapacitated.

- b) **Guidance Regarding Sexual Consent.** Consent can be accurately gauged only through direct communication about the decision to engage in sexual contact. Presumptions based upon contextual factors (such as clothing, alcohol consumption, or dancing) should not be considered as evidence for consent.

Although consent does not need to be verbal, verbal communication is the most reliable form of asking for and gauging consent. Talking with sexual partners about desires and limits may seem awkward, but such direct and explicit communication serves as the best means of obtaining consent.

- (1) Consent requires an outward demonstration, through mutually understandable words or actions, indicating that an individual has voluntarily chosen to engage in a specific form of sexual contact.
- (2) Consent cannot be achieved through manipulation, coercion, force or by taking advantage of the incapacitation of another individual.
- (3) An individual can withdraw consent at any time prior to or during any form of sexual contact, and when consent is withdrawn during any form of sexual contact, the sexual contact must end immediately.
- (4) When the issue of consent is placed in dispute by a complainant or respondent, the University will consider all relevant facts and circumstances, including without limitation
 - (a) the presence or absence of affirmative words or actions indicating a willingness to engage in sexual contact,
 - (b) whether a reasonable person would have understood the words and acts at issue as expressing consent; and
 - (c) whether there are any circumstances, known or reasonably apparent to any of the involved parties, demonstrating incapacitation or any other inability to make a voluntary choice to engage in sexual contact.

4. **Formal complaint.** The term “formal complaint” means a document filed by a complainant or signed by the Title IX Coordinator alleging sex discrimination or sexual harassment against a respondent and requesting that the University investigate the allegation of such complaint. At the time of filing a formal complaint, a complainant must be participating in or attempting to participate in the education program or activity of the University with which the formal complaint is filed. A formal complaint may

be filed with the Title IX Coordinator in person, by mail, or by electronic mail, by using the contact information for the Title IX Coordinator set forth in this Policy. As used in this paragraph, the phrase “document filed by a complainant” means a document or electronic submission that contains the complainant’s physical or digital signature, or otherwise indicates that the complainant is the person filing the formal complaint.

5. *Incapacitation.* The term “incapacitation” means a person’s physical and/or mental inability to make informed, rational judgments to the extent that the individual is incapable of giving consent.

a) Incapacitation. Incapacitation resulting in the physical and/or mental inability to make informed, rational judgments precludes a person from giving consent as that term is used in this Policy. Incapacitation may be caused by a permanent or temporary physical or mental impairment. Incapacitation may also result from the consumption of alcohol or drugs.

The use of alcohol or drugs may, but does not automatically, affect a person’s ability to consent to sexual contact. The consumption of alcohol or drugs may create a mental incapacity if the nature and degree of the intoxication go beyond the stage of merely reduced inhibition and reach a point in which the victim does not understand the nature and consequences of the sexual contact. In the latter case, the person cannot provide consent. A person who is asleep or who is passed out or unconscious as a result of the consumption of alcohol or drugs is physically helpless and is not able to consent.

A person violates this Policy if the person has sexual contact with someone who the person knows or should know is incapacitated—regardless of the cause, including intoxication to the point of causing incapacitation. The test of whether an individual should know that another person is incapacitated is whether a reasonable, sober person would be able to ascertain the other person’s incapacitation.

A respondent cannot rebut an allegation of sexual harassment merely by arguing drunkenness or other drug impairment prevented the respondent from knowing that the other person was incapacitated.

6. *Respondent.* The term “respondent” means an individual who has been reported to be the perpetrator of conduct that could constitute sexual harassment.

C. Reporting Sex Discrimination or Sexual Harassment.

1. *Persons Who Can Report Sex Discrimination or Sexual Harassment.* Any person participating in, or attempting to participate in, a university program or activity may report sex discrimination, including sexual harassment (whether or not the person reporting is the person alleged to be the victim of conduct that could constitute sex discrimination or sexual harassment), sexual assault, dating violence, domestic violence or stalking. Following such report, the Title IX Coordinator will provide the student or employee a written explanation of the individual’s rights and options, irrespective of whether or not the offense occurred on-or-off campus.
2. *Reporting Methods.* A report of sex discrimination, including sexual harassment, may be made in person, by mail, by telephone, or by electronic mail, using the contact information listed in this Policy for the Title IX Coordinator, or by any other means that results in the Title IX Coordinator receiving the person’s verbal or written report. Such a report may be made at any time (including during non-business hours) by using the telephone number or electronic mail address, or by mail to the office address, listed in this Policy for the University’s Title IX Coordinator. In addition to the Title IX Coordinator, the University’s Chief Human Resources Officer may also receive notice of reports of sex discrimination, including sexual harassment, under this Policy.

All University employees (except Confidential Resources, as identified in Section X. of this Policy) are required to report conduct that may constitute sex discrimination or sexual harassment to the Title IX Coordinator or the Chief Human Resources Officer (“CHRO”). Nevertheless, only reports of sexual harassment or sex discrimination made to the Title IX Coordinator or the CHRO will confer on the University “actual knowledge” of such prohibited conduct for purposes of this Policy.

3. *Amnesty from Drug, Alcohol, and Related University Policies.* The University encourages reporting and seeks to remove any barriers to reporting by making the procedures for reporting transparent and straightforward. The University recognizes that an individual who has been drinking or using drugs at the time of the incident may be hesitant to make a report because of potential consequences for their own conduct, which may violate other University policies and codes of conduct.

An individual who reports sexual misconduct will not be subject to disciplinary action by the University for their own personal consumption of alcohol or drugs at or near the time of the incident, provided that 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 the use of alcohol or other drugs. This amnesty policy applies to the University’s student conduct process as well as related policies applicable to students, faculty and staff.

While the University may waive disciplinary action under its policies related to use of alcohol and drugs as indicated above, it retains the responsibility to report any illegal use of these substances as required by law and will act in compliance with those laws.

D. Responding to Sex Discrimination or Sexual Harassment in the Absence of a Formal Complaint.

1. *Prompt Response.* When the University has actual knowledge of sex discrimination, including sexual harassment, in an education program or activity of the University against the person in the United States, the University will respond promptly, reasonably and with deliberate attention.
2. *Equitable Treatment.* The University’s response will treat complainants and respondents equitably by offering supportive measures to the complainant and by following the grievance process outlined in this Policy before the imposition of any disciplinary sanctions or other actions that are not supportive measures against a respondent.
3. *Prompt Efforts to Contact the Complainant.* Upon actual knowledge of sex discrimination or sexual harassment, the Title IX Coordinator will contact the complainant promptly
 - a) to discuss the availability of supportive measures,
 - b) to consider the complainant’s wishes with respect to supportive measures,
 - c) to inform the complainant of the availability of supportive measures with or without the filing of a formal complaint, and
 - d) to explain to the complainant the process for filing a formal complaint.
4. *Scope of the University’s Responsibility to Respond.* For purposes of this Policy, the phrase “education program or activity” includes locations, events, or circumstances over which the University exercises substantial control over both the respondent and the context in which the sexual harassment occurs, including any building owned or controlled by a student organization that is officially recognized by the University. The phrase “education program or activity” also encompasses conduct occurring on the

University's computer and internet networks, digital platforms, and computer hardware or software owned or operated by, or used in the operations of, the University.

E. Reporting or Filing a Formal Complaint of Sex Discrimination (other than Sexual Harassment).

1. *Persons Who Can Initiate a Formal Complaint of Sex Discrimination.* A formal complaint of sex discrimination (other than Sexual Harassment) may be filed by a complainant or signed by the Title IX Coordinator.
2. *Procedure for a Complainant to Initiate a Formal Complaint of Sex Discrimination.* If a complainant chooses to file a formal complaint, the complainant must sign and submit a document to the Title IX Coordinator (in person, by mail, or by electronic mail, using the contact information for the Title IX Coordinator set forth in this Policy), alleging sex discrimination against a respondent and requesting that the University investigate the allegation of sex discrimination. At the time of filing a formal complaint, a complainant must be a student or employee of the University or an individual otherwise participating in or attempting to participate in an education program or activity or employment at the University.
3. *Procedure for the Title IX Coordinator to Initiate a Formal Complaint of Sex Discrimination.* Regardless of whether a complainant has filed a formal complaint, the Title IX Coordinator can choose to sign a formal complaint alleging sex discrimination against one or more respondents and requesting that the University investigate the allegation of sex discrimination. In deciding whether to sign a formal complaint, the Title IX Coordinator will consider the following factors:
 - a) the severity and pervasiveness of the alleged sex discrimination;
 - b) any pattern of alleged misconduct attributed to the person or persons accused of engaging in sex discrimination;
 - c) the risk of serious harm to any student, employee or other individual associated with the University; and/or
 - d) any other factor, whose consideration is permitted by applicable law, that directly or indirectly implicates the University's interests in providing a safe and productive learning or working environment.
4. *Investigation Process.* Complaints of conduct that, if true, would constitute sex discrimination (other than sexual harassment) in violation of this Policy will be investigated thoroughly, promptly and in a confidential manner to the extent possible. However, given the nature of such an investigation, which may require interviews with witnesses, the University cannot guarantee absolute confidentiality with respect to matters handled under this Policy. While investigations of complaints of sex discrimination (other than sexual harassment) will be thorough, unlike the procedures that apply to complaints of sexual harassment under this Policy, investigations of sex discrimination (other than sexual harassment) will be conducted and completed without a hearing process.

Upon completion of an investigation of sex discrimination under this Policy, the University will communicate its findings and intended actions to the complainant and the person(s) accused of having violated this Policy as expeditiously as possible. If the investigator finds that sex discrimination in violation of this Policy occurred, the person who has violated this Policy will be subject to appropriate instructive and/or disciplinary procedures. In the case of University employees, if sex discrimination in violation of this Policy is established, disciplinary action for a violation of this policy may range from verbal or written warnings up to and including immediate termination of employment,

depending upon the circumstances. With regard to Policy violations by non-employees, corrective action will be taken after consultation with appropriate University personnel.

The University takes all complaints pursuant to this Policy seriously. Accordingly, any individual found to have knowingly made a false report or complaint in bad faith will be subject to corrective action up to and including suspension or expulsion from the University or termination of employment from the University.

F. Reporting or Filing a Formal Complaint of Sexual Harassment.

1. *Persons Who Can Initiate a Formal Complaint of Sexual Harassment.* A formal complaint of sexual harassment may be filed by a complainant or signed by the Title IX Coordinator.
2. *Procedure for a Complainant to Initiate a Formal Complaint.* If a complainant chooses to file a formal complaint, the complainant must sign and submit a document to the Title IX Coordinator (in person, by mail, or by electronic mail, using the contact information for the Title IX Coordinator set forth in this Policy), alleging sexual harassment against a respondent and requesting that the University investigate the allegation of sexual harassment. At the time of filing a formal complaint, a complainant must be a student or employee of the University or an individual otherwise participating in or attempting to participate in an education program or activity or employment at the University.
3. *Procedure for the Title IX Coordinator to Initiate a Formal Complaint of Sexual Harassment.* Regardless of whether a complainant has filed a formal complaint, the Title IX Coordinator can choose to sign a formal complaint alleging sexual harassment against one or more respondents and requesting that the University investigate the allegation of sexual harassment. In deciding whether to sign a formal complaint, the Title IX Coordinator will consider the following factors:
 - a) the severity and pervasiveness of the alleged sexual harassment;
 - b) any pattern of alleged misconduct attributed to the Respondent (e.g., serial predation);
 - c) the risk of serious harm to any student, employee or other individual associated with the University;
 - d) whether the complainant's allegations involved violence, threats, use of weapons, or similar factors;
 - e) whether the complainant's allegations have prompted the involvement of law enforcement and/or criminal proceedings; and/or
 - f) any other factor, whose consideration is permitted by applicable law, that directly or indirectly implicates the University's interests in providing a safe and productive learning environment.

G. Responding to a Formal Complaint of Sexual Harassment.

1. *Application of Grievance Process.* In response to a formal complaint, the University will follow the grievance process set forth in this Policy. This grievance process is designed to treat complainants and respondents equitably by providing remedies to a complainant where a determination of responsibility for sexual harassment has been made against the respondent, and by following a grievance process that complies with the Title IX Regulations before the imposition of any disciplinary sanctions or other actions that are not supportive measures against a respondent.

2. *Administrative Processing of a Formal Complaint.* When a formal complaint is made, the following administrative procedures will occur:

- a) *Conflict Analysis.* As a preliminary matter, the Title IX Coordinator identified in this Policy will analyze whether such person has a conflict of interest that would preclude such person from acting as the Title IX Coordinator for the formal complaint at issue. A conflict of interest that precludes a person from holding a Title IX Coordinator, investigator, decision-maker/hearing officer or appeal officer role is one that would undermine the person's ability to approach an allegation or formal complaint of sexual harassment with impartiality. Such a conflict could arise, for example, from an intimate relationship or a very close personal relationship; however, merely knowing a complainant or respondent will not constitute a conflict of interest for purposes of this Policy. If such a conflict exists, the University's Title IX Coordinator or Chief Human Resources Officer will designate another properly trained individual to serve in the capacity at issue.
- b) *Role Assignments.* The Title IX Coordinator will assign an investigator to investigate the formal complaint. Where the complainant and respondent voluntarily choose to attempt to reach an informal resolution of the formal complaint, the Title IX Coordinator will select a mediator to facilitate an informal resolution process. Where an informal resolution process is not elected or where it is elected but is unsuccessful, the Title IX Coordinator will also identify the appropriate decision-maker who will serve as the hearing officer presiding over the hearing of the formal complaint as the person who will decide whether a finding of responsibility for sexual harassment should be made and, if so, what remedies should be imposed against the respondent. For a formal complaint against a non-faculty University employee, the default decision-maker will be the Chief Human Resources Officer or such person's designee. For a formal complaint against a University faculty member, the default decision-maker will be the Vice President for Academic Affairs or such person's designee. For formal complaints against a student, the default decision-maker will be the Dean of Students or such person's designee. For each of these role assignments, an analysis will be performed to determine whether a person selected as an investigator or decision-maker has a conflict of interest that would prevent such person from serving in the role at issue.
- c) *Training Requirements.* The University will ensure that all Title IX Coordinators, investigators, decision-makers, and any person who facilitates an informal resolution process, shall receive training on the definition of sexual harassment; the scope of the University's education program or activity; how to conduct an investigation and grievance process including hearings, appeals, and informal resolution processes, as applicable; and how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias. The University will also ensure that decision-makers receive training on any technology to be used at a live hearing and on issues of relevance of questions and evidence, including when questions and evidence about the complainant's sexual predisposition or prior sexual behavior are not relevant. The University will ensure that investigators receive training on issues of relevance to create an investigative report that fairly summarizes relevant evidence. Materials used to train the University's Title IX Coordinators, investigators, decision-makers, and any person who facilitates an informal resolution process will not rely on sex stereotypes and will promote impartial investigations and adjudications of formal complaints of sexual harassment.

3. *Investigation Process.* The investigation of any formal complaint will be conducted in accordance with the following procedures. Such procedures will also be followed for reports of sexual assault, dating violence, domestic violence, or stalking that fall outside the scope of Title IX.

- a) *Investigation.* When a formal complaint meets the requirements of this Policy, the Title IX Coordinator, or designee, will assign a trained investigator to conduct a prompt, fair and

impartial investigation of allegations contained in the formal complaint. All parties and witnesses are expected to provide truthful information. Knowingly providing false or misleading information is a violation of university policy and can subject a student or employee to disciplinary action. The investigator or designee will provide timely updates, as appropriate or requested, about the timing and status of the investigation.

It is the responsibility of the University, not the parties, to gather relevant information, to the extent reasonably possible. The investigator will conduct a fair and reliable fact-gathering based on the allegations in the Formal Complaint. The investigator will be responsible for interviewing the Complainant and the Respondent, interviewing potential witnesses; collecting relevant documentation and physical evidence, including documents, communications between the Parties, and other electronic records as appropriate; creating a timeline; and preparing a written report documenting the complete investigation.

- b) *Relevance.* The investigator will consider only relevant evidence that is available in a particular case. The term “relevance” shall have its ordinary meaning in any grievance process conducted under this Policy. Relevant questions are those that call for information that will assist the decision-maker/hearing officer in deciding whether the allegation(s) and information in the investigation are either more likely or less likely to be true. Many forms of evidence that are logically relevant would not be admissible in a court of law based on application of the Federal Rules of Evidence or other applicable evidentiary standards that apply in judicial proceedings. Such evidence, so long as it is relevant, will nevertheless be available for consideration by an investigator. For example, a question cannot be excluded on the basis of relevance solely because it may be unduly prejudicial, concern prior bad acts, or constitute character evidence; however, questions that badger a witness or are unfairly repetitious may be deemed irrelevant. Questions concerning the complainant’s sexual history are not relevant unless offered to prove that someone other than the respondent committed the conduct alleged by the complainant or if the questions and evidence concern specific incidents of the complainant’s prior sexual behavior with respect to the respondent and are offered to prove consent.
- c) *Objective Evaluation.* The investigator will conduct an objective evaluation of all relevant evidence — including both inculpatory and exculpatory evidence. At no stage of the grievance process will credibility determinations be made based on a person’s status as a complainant, respondent, or witness. Formal complaints of sexual harassment often involve allegations with competing plausible narratives and no eyewitnesses. Such situations will be evaluated by objectively evaluating the relevant evidence, regardless of whether that available, relevant evidence consists of the parties’ own statements, statements of witnesses, or other evidence. This does not mean that corroborating evidence is required, but the availability of corroborating evidence may bolster a party’s position in support of or in opposition to a formal complaint.
- d) *Presumption of No Responsibility.* Formal complaints will be handled with a presumption that the respondent is not responsible for alleged sexual harassment until a determination regarding responsibility is made at the conclusion of the grievance process. The presumption of non- responsibility does not mean that a respondent, complainant or witness is considered presumptively truthful, untruthful, credible or not credible. An investigator is free to develop an understanding of, and to take into account, each party’s interests and the “stakes” at issue for each party. What is at stake, in and of itself, shall not reflect on the party’s truthfulness.
- e) *Respect for Legal Privilege.* The University will not require, allow, rely upon, or otherwise use questions or evidence that constitute, or seek disclosure of, information protected under a legally recognized privilege, unless the person holding such privilege has waived the privilege.

For instance, medical and counseling records of either party are privileged confidential records that the university cannot access, consider, disclose, or otherwise utilize without the express written consent of the party that holds the privilege. If a party decides to share such records with the Investigator after providing their written consent, those records become a part of the investigation and are available for review by the opposing party. Records maintained by the following are examples of privileged medical records: a physician, a psychiatrist, a psychologist, or other recognized professional or paraprofessional acting in the professional's or paraprofessional's capacity, or assisting in that capacity, and which are made and maintained in connection with the provision of treatment of the party. Additionally, records pertaining to conversations between an attorney and their client, as well as conversations between an individual and a member of the clergy or ordained minister pursuant to seeking spiritual advice, are privileged. These are also records that the university cannot access, consider, disclose, or otherwise utilize without the express written consent of the party that holds the privilege. If a party decides to share such records with the Investigator after providing their written consent, those records become a part of the investigation and are available for review by the opposing party.

- f) *Time Frames for Conclusion of the Grievance Process.* The University endeavors to complete the grievance process for a formal complaint within 90 days from the date on which a complainant files, or the Title IX Coordinator signs, the formal complaint through the date on which a decision-maker issues a decision in such case.
- g) *Delays.* The University intends to adhere to the time frames set forth in this Policy whenever possible; however, the University reserves the right to extend the grievance process time frames for good cause and, when exercising that right, will provide written notice to the complainant and the respondent of the delay or extension and the reasons for the action. Good cause may include the complexity of the circumstances surrounding an allegation; scheduled and unscheduled breaks; campus closures; the absence of a party, a party's advisor, or a witness; concurrent law enforcement activity; or the need for language assistance or accommodation of disabilities.
- h) *Burdens of Proof and of Gathering Evidence.* The burden of proof and the burden of gathering evidence sufficient to reach a determination regarding responsibility rest on the University and not on the parties.
- i) *Standard of Evidence.* In determining whether this Policy has been violated, the University will apply the preponderance of the evidence standard, meaning "is it more likely than not that the allegation(s) are substantiated." This standard of evidence applies to all complaints of sexual harassment, sexual assault, dating violence, domestic violence, or stalking, including such complaints that fall outside the scope of Title IX.
- j) *Equal Opportunity to Present and Inspect Evidence.* The University's investigation and adjudication of the allegations must be based on an objective evaluation of the relevant evidence available in a particular case; however, the type and extent of evidence available will differ based on the facts of each allegation of sexual harassment. The investigator shall provide an equal opportunity for the parties to present witnesses, including fact and expert witnesses, and other inculpatory and exculpatory evidence. Furthermore, both parties shall have an equal opportunity to inspect and review any evidence obtained as part of the investigation that is directly related to the allegations raised in a formal complaint, including the evidence upon which the University does not intend to rely in reaching a determination regarding responsibility and inculpatory or exculpatory evidence whether obtained from a party or other source, so that each party can meaningfully respond to the evidence prior to conclusion of the investigation.

k) *Time to Review Evidence Considered by the Investigator.* Prior to completion of the investigative report, the investigator shall send to each party and the party's advisor, if any, the evidence subject to inspection and review in an electronic format or a hard copy, and the parties will have at least 10 calendar days to submit a written response, which the investigator will consider prior to completion of the investigative report. All such electronic copies and/or hard copies of such evidence shall be returned to the University's Title IX office within twenty (20) calendar days following the date on which a decision has been issued on a formal complaint (if no appeal is filed) or, where an appeal is filed, within ten (10) calendar days from the date on which a decision is issued by the appeal officer assigned to the case.

l) *Preparation of an Investigation Report.* The investigator shall create an investigative report that fairly summarizes relevant evidence and, at least 10 days prior to a hearing on the formal complaint, send to each party and the party's advisor, if any, the investigative report in an electronic format or a hard copy, for their review and written response.

m) *No Gag Orders.* Neither the complainant nor the respondent shall be restricted in the ability to discuss the allegations under investigation or to gather and present relevant evidence.

n) *Advisor Participation.* The University shall provide the parties with the same opportunities to have others present during any grievance proceeding, including the opportunity to be accompanied to any related meeting or proceeding by the advisor of their choice, who may be, but is not required to be, an attorney, and not limit the choice or presence of advisor for either the complainant or respondent in any meeting or grievance proceeding. The University, however, reserves the right to establish restrictions regarding the extent to which the advisor may participate in the proceedings (with any such restrictions applying equally to both parties).

o) *Notice with Time to Prepare.* The University shall provide, to a party whose participation is invited or expected, written notice of the date, time, location, participants, and purpose of all hearings, investigative interviews, or other meetings, with sufficient time (i.e., at least ten (10) calendar days) for the party to prepare to participate.

p) *Consolidation of Formal Complaints.* The University reserves the discretion to consolidate related formal complaints as permitted by the Title IX Regulations.

4. *Informal Resolution.* If a formal complaint is filed, the parties may voluntarily agree to engage in an informal resolution process to attempt a resolution of any formal complaint except those involving allegations that an employee sexually harassed a student. The University will facilitate such an informal resolution process with the consent of the parties. Such an informal resolution process can occur at any time prior to reaching a determination regarding responsibility. If the parties resolve a formal complaint through an informal resolution process, the parties will be precluded from resuming a formal complaint arising from the same allegations that were included in the resolved formal complaint. If a party chooses to withdraw from an informal resolution process at any time prior to a resolution being reached, the formal complaint shall return to the grievance process. The grievance process timeline contemplated in this Policy shall be held in abeyance for any period of time during which a formal complaint is pending in an informal resolution process.

5. *Hearing Procedures.* Following an investigation of a formal complaint, the formal complaint will be submitted to a live hearing, presided over by the decision-maker. The following procedures shall apply to such a live hearing:

a) *Availability of Evidence.* All evidence considered in the preparation of the investigation report concerning the formal complaint will be available to the parties for their inspection and review

before the hearing so that each party has an equal opportunity to refer to such evidence during the hearing, including for purposes of cross-examination.

- b) *Questioning of Witnesses.* At the live hearing, the decision-maker must permit each party's advisor to ask the other party and any witnesses all relevant questions and follow-up questions, including those challenging credibility. All questioning of parties and witnesses shall occur in a respectful, non-abusive manner. Such cross-examination at the live hearing must be conducted directly, orally, and in real time by the party's advisor of choice and never by a party personally. If a party does not have an advisor present at the live hearing, the University will provide without fee or charge to that party, an advisor of the University's choice, who may be, but is not required to be, an attorney, to conduct cross-examination on behalf of that party. If deemed reliable and relevant by the decision-maker, and not otherwise subject to exclusion under this Policy, the decision-maker may consider the statements of a party or witness who was not present at the hearing, or a party or witness who was present at the hearing but who nevertheless was not subject to cross examination. This includes, but is not limited to, information, statements, and materials provided or gathered during the investigative process.
- c) *Advisor Participation.* A party shall notify the Title IX Coordinator at least five calendar days prior to a scheduled hearing if such party has engaged an advisor (including the identity and contact information for such advisor) to perform the questioning of the opposing party and witnesses at a hearing on the party's behalf. If a party does not have an advisor, the University will appoint an advisor (of the University's choice) to perform questioning on behalf of the party at the hearing. Such an advisor has only one obligation at hearing: relaying the party's desired questions to the other party and witnesses (to the extent such questions are consistent with the decorum and other rules set forth in this Policy and imposed by the decision-maker equally on both parties). If a party to whom the University assigns an advisor refuses to work with the advisor when the advisor is willing to conduct cross-examination on the party's behalf, then the party has no right of self-representation with respect to conducting questioning at the hearing, and that party would not be able to pose any questions.
- d) *Opening and Closing Remarks.* At the outset of the live hearing, the decision-maker will permit each party (or the party's advisor) to make opening remarks of no more than five (5) minutes. At the conclusion of the presentation of all evidence in a hearing, the decision-maker will permit each party (or the party's advisor) to make closing remarks of no more than five (5) minutes. Professional decorum must be maintained throughout such opening and closing remarks, and the decision-maker shall have the discretion to cut off such remarks by a party (or the party's advisor) if professional decorum is not maintained by that party (or that party's advisor).
- e) *Rulings on Witness Questions.* Only relevant cross-examination and other questions may be asked of a party or witness. Before a complainant, respondent, or witness answers a cross-examination or other question, the decision-maker shall determine whether the question is relevant and explain any decision to exclude a question as not relevant. Advisors may interpose objections to any question to present arguments regarding whether such question should be permitted, and in the event any such objection is made; however, any such objection should be made prior to the witness's answer being given. Questions and evidence about the complainant's sexual predisposition or prior sexual behavior are not relevant, unless such questions and evidence about the complainant's prior sexual behavior are offered to prove that someone other than the respondent committed the conduct alleged by the complainant, or if the questions and evidence concern specific incidents of the complainant's prior sexual behavior with respect to the respondent and are offered to prove consent. The decision-maker's rulings on questions posed to parties and witnesses are not subject to challenge by a party or the party's advisor during the hearing.

- f) *Relevance*. A decision-maker shall apply the same standard of relevance as is required for investigators under Section VI(F)(3)(i) of this Policy, meaning all relevant evidence presented at a hearing shall be considered by the decision-maker (unless consideration of such evidence is prohibited by the Title IX Regulations). Furthermore, a decision-maker shall be free to rule repetitive questions to be irrelevant and exclude such repetitive evidence.
- g) *Requests for Separation*. At the request of either party, the decision-maker must provide for the live hearing to occur with the parties located in separate rooms with technology enabling the decision-maker and parties to simultaneously see and hear the party or the witness answering questions.
- h) *Location of Hearings*. The University reserves the discretion to conduct any hearing under this Policy with all parties physically present in the same geographic location or with any or all parties or other participants appearing virtually with technology enabling participants simultaneously to see and hear each other.
- i) *Transcripts*. The University will provide the parties an opportunity to inspect and review a transcript (or, at the University's sole discretion, an audio or audiovisual recording) of any live hearing conducted under this Policy.
- j) *Confidential Proceedings*. Consistent with the University's obligation to maintain confidentiality with respect to hearings on formal complaints made under this Policy, no one other than a party's advisor (and any person whose involvement is required by law, e.g., an interpreter for a party who suffers from a disability that necessitates the participation of an interpreter) shall be permitted to attend or observe a hearing with a party.
- k) *Professional Decorum*. All parties and witnesses shall maintain professional decorum throughout a hearing conducted under this Policy. The expectation of professionalism includes, without limitation, that no person may badger or harass any party, witness, decision-maker or other University personnel involved in the hearing proceeding. Furthermore, a party shall be free to confer with the party's advisor during a hearing, such conferral shall not take place in a loud or disruptive manner. If a party or advisor violates any rules imposed on parties equally by this Policy or by a decision-maker during a hearing, the University retains authority to respond in accordance with its policies governing student and employee misconduct.
- l) *Written Determinations*. Applying the preponderance of evidence standard, the decision-maker, who will be someone other than the Title IX Coordinator or the investigator assigned to a formal complaint, shall issue simultaneously to each party a written determination regarding responsibility following the conclusion of a live hearing. Such written determination shall include the following:
- (1) Identification of the allegations potentially constituting sexual harassment;
 - (2) A description of the procedural steps taken from the receipt of the formal complaint through the determination (including any notifications to the parties, interviews with parties and witnesses, site visits, methods used to gather other evidence, and hearings held);
 - (3) Findings of fact supporting the determination;
 - (4) Conclusions regarding the application of the University's code of conduct to the facts;

(5) A statement of, and rationale for, the result as to each allegation, including a determination regarding responsibility, any disciplinary sanctions the University imposes on the respondent, and whether remedies designed to restore or preserve equal access to the University's education program or activity will be provided by the University to the complainant; and

(6) The University's procedures and permissible bases for the complainant and respondent to appeal.

6. *Appeal Procedures.* If a complainant or respondent wishes to appeal the decision of the decision-maker presiding over the live hearing of a formal complaint, the party wishing to appeal must comply with the following procedures:

a) *Grounds for Appeal.* An appeal can be based on any one or more of the following grounds:

(1) Procedural irregularity that affected the outcome of the matter;

(2) New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter; or

(3) The Title IX Coordinator, investigator(s), or decision-maker had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the matter.

b) *Notice of Appeal.* A party may appeal a decision-maker's decision based on one or more grounds for appeal identified in this Policy; however, such appeal must be submitted in writing to the Title IX Coordinator within ten (10) calendar days after the issuance of the decision-maker's decision to the parties. The Title IX Coordinator shall notify the other party in writing when an appeal is filed and implement appeal procedures equally for both parties.

c) *Appellate Briefing.* Each party to an appeal shall have an equal opportunity to submit a written statement in support of, or challenging, the outcome of a live-hearing in a case that is appealed under this Policy. Absent an extension granted by an appeal officer presiding over the case, any such written statement must be submitted to the Title IX Coordinator within 10 calendar days after the Title IX Coordinator has provided the notice required in Section VI(F)(6)(ii).

d) *Appeal Officers.* The University shall appoint three individuals (none of whom can be the person who served as the Title IX Coordinator, investigator, advisor or decision-maker for the underlying formal complaint) to serve as appeal officers to hear and decide any appeal that is filed under this Policy. The University shall designate one appeal officer to chair the appeal panel. The appeal officers shall apply the preponderance of evidence standard in deciding an appeal and shall decide the outcome of the appeal by majority vote. However, in instances where a total of three individuals are not available to serve as appeal officers, the University shall appoint a single appeal officer to decide the outcome of an appeal, and such person's decision shall be final.

e) *Written Decision.* Following the briefing period, the appeal officer serving as the chair of the appeal panel shall issue a written decision describing the result of the appeal and the rationale for the result. Such written decision shall be provided simultaneously to the parties by the Title IX Coordinator.

f) *Finality.* A determination regarding responsibility becomes final either on the date that the University provides the parties with the written determination of the result of the appeal, if an appeal is filed, or on the eleventh (11th) calendar day following the University's provision of the written determination to the parties (if no appeal is filed by either party during the 10-day period for filing an appeal). Such determination shall be provided simultaneously to the parties by the Title IX Coordinator.

g) *Remedies.* If a finding of responsibility for violating this Policy is made, the remedies imposed may include supportive measures, the range of such supportive measures available to complainants and respondents is set forth in this Policy's definition of the term "supportive measures." Furthermore, such remedies may include disciplinary sanctions, punitive measures and measures that burden the respondent. Sanctions for a violation of this Policy by a student may include, but is not limited to: no-contact orders; educational training; expulsion; suspension; disciplinary probation; mandated counseling assessment which may include anger management course(s), alcohol and/or drug education program(s), and other requirements based upon the counseling assessment; restrictions on campus privileges including restrictions on campus housing or participation in student activities; community service; and/or other educational sanctions. Sanctions for a violation of this policy by an employee may include, but is not limited to: leave with pay, leave without pay, termination, change in job responsibilities or duties, relocation of assignment, mandated counseling or anger management assessment, mandated training, such as sexual harassment prevention. The Title IX Coordinator is responsible for effective implementation of any remedies imposed under this Policy. Upon request, the Title IX Coordinator will provide the University's written procedures for disciplinary action in cases of alleged sexual assault, dating violence, domestic violence, and stalking.

H. Emergency Removal. Notwithstanding any other provision of this Policy that may suggest otherwise, the University may choose to remove a respondent from any University education program or activity on an emergency basis if, based on an individualized safety and risk analysis, the University determines that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of sexual harassment justifies such removal. When the University exercises its right to implement an emergency removal, the University will notify the respondent of that decision and provide the respondent with an opportunity to challenge the decision immediately following the removal.

I. Administrative Leave. Notwithstanding any other provision of this Policy that may suggest otherwise, the University may choose to place a non-student employee respondent on administrative leave during the pendency of a grievance process under this Policy. Furthermore, nothing in this Policy is intended to, or shall be construed to, modify the at-will nature of any employment relationship with the University.

VII. VIOLATIONS OF LAW

Sexual harassment may also violate the laws of the city, state or country where the incident occurred and subject the person engaging in sexual harassment to criminal prosecution by the presiding authority. The University will comply with laws of these various jurisdictions.

- 1. Federal:** Title IX and the Title IX Regulations prohibit discrimination on the basis of sex in education programs or activities operated by recipients of federal financial assistance. <https://www.justice.gov/crt/title-ix> This Policy has been implemented pursuant to Title IX.
- 2. State:** Sex offenses are defined by laws of individual states and other local jurisdictions.

Global Campuses: Members of the University community, visitors to campus, and participants at one of the University's global campuses should be aware that they are subject to the laws of the country in which they are located concerning what conduct constitutes sexual assault or a sexual offense.

VIII. TITLE IX STAFF

A. The Title IX Team. The Title IX Coordinator is the person the University has designated and authorized to coordinate the University's efforts to comply with the University's responsibilities under Title IX. The Title IX Coordinator's duties include overseeing all Title IX reports of alleged sexual harassment. The Title IX Coordinator has the full support of the University. If the Title IX Coordinator identified in this Policy is unavailable for any reason to serve as the Title IX Coordinator for a particular report or formal complaint of sexual harassment under this Policy, the Chief Human Resources Officer of the University shall identify the person who will serve as the acting Title IX Coordinator for such report or formal complaint. In the absence of a decision to the contrary by the University's Chief Human Resources Officer, a Deputy Title IX Coordinator will be deemed, as a matter of default, the acting Title IX Coordinator for a particular report or formal complaint for which the Title IX Coordinator identified in this Policy is unavailable for any reason.

The Title IX Coordinator has ultimate oversight responsibility and works with the investigator who assists in fulfilling the Title IX Coordinator's responsibilities.

The University may designate additional investigators or assistants to aid the Title IX Office in the event of a significant volume of reports of sexual harassment, in response to a recusal of one or more members of the Title IX office with respect to a particular matter, or in any other circumstance that the University deems appropriate.

Members of this Title IX team receive training at least on an annual basis related to carrying out their roles and responsibilities.

Title IX Coordinator

Kimberley Bynum-Smith
Director, Office for Civil Rights Compliance and Title IX Coordinator 200 Hazel, 2nd Floor St. Louis, MO 63119
314-246-7780
kimberleybynumsmith@webster.edu

Civil Rights & Title IX Investigator

Beth Oberg
Civil Rights & Title IX Investigator
200 Hazel, 2nd Floor St. Louis, MO 63119
314-246-7951
bethoberg@webster.edu

Webster also reserves the right to engage additional trained Deputy Title IX Coordinators and/or Title IX investigators on an ad-hoc basis as necessary.

Sexual Offense Advocate (24/7)

470 E. Lockwood Avenue, St. Louis, MO 63119
314-968-7030 (office)
314-649-8474 (mobile)

Office of Public Safety (24/7)

527 Garden Avenue (Next to Garden Ave. Garage) St. Louis, MO 63119
314-968-7430
314-968-6911 (Emergency)

IX. ACADEMIC FREEDOM

The University is firmly committed to free expression and academic freedom. Nothing in this Policy is intended to chill the free expression or academic freedom of anyone at Webster University. Members of the University community are free to express their views on any academic subject—regardless of whether those viewpoints are provocative or controversial. In contrast, however, sexual harassment and retaliation prohibited by this Policy do not constitute the exercise of academic freedom. The University will consider academic freedom and free expression in the investigation of any report of sexual harassment or retaliation that involves an individual's alleged speech or other communication and will take care to distinguish between viewpoint criticisms and academic discourse, which will not constitute sexual harassment, and offensive comments that are directed at an individual based on the individual's sex, gender, or other legally protected characteristics or status, which could constitute sexual harassment.

APPENDIX A: TITLE IX SEXUAL ASSAULT PREVENTION AND EDUCATION RESOURCES

Multiple resources are made available to reporting parties and victims of sexual assault, either directly through the University or through various community resources. Below are some of those resources. Upon request, the Title IX Coordinator will also provide written notification of such resources available to students and employees.

Legal Assistance

Legal Services of Eastern Missouri represents people in orders of protection, divorce, custody, and paternity cases. Since 1956, LSEM has provided free legal help for more than one million low-income individuals/families with civil issues impacting housing, family law, public benefits, consumer fraud, healthcare, children's well-being, special education and relief from domestic violence. Call 314-534-4200.

Financial Aid

Financial Help for Women in Abusive Relationships: Mustering the courage to leave an abusive relationship is a process in itself. Overcoming the final barriers — emotional and logistical — to actually leaving is still a major step. Planning and preparing can be antidotes to fear, but even if you have to leave suddenly, there are ways to make the departure less wrenching. <https://www.moneygeek.com/financial-planning/resources/financial-help-women-abusive-relationships/>

Managing money is not easy, especially when women of all ages and backgrounds juggle multiple priorities. Annuity.org offers professional insight from experienced financial experts on a variety of financial topics to help you make smart decisions about your money. <https://www.annuity.org/financial-literacy/women/>

Visa and Immigration Services

The International Institute of St. Louis (IISTL) is St. Louis's community immigrant service and information hub. Their programs and services for immigrants, their families, and the wider community are locally and nationally acclaimed. IISTL connects new arrivals with first-touch services and resources, engage foreign-born and the wider community, and build a more inclusive community. <https://www.iistl.org/>

Immigration Help's mission is to help immigrants find freedom, opportunity, and love in the United States-without the high cost of an attorney. They have a 98% success rate, since 2019. <https://www.immigrationhelp.org/>

The Sexual Offense Advocate

The Sexual Offense Advocate can be reached 24 hours a day, seven days a week by mobile phone at 314-649-8474, through Public Safety at 314-968-6911 or 314-968-7430, or during office hours in the Counseling and Life Development Office at 314-968-7030.

Sexual Offense Support Groups

The Sexual Offense Support Group is established and maintained by the Counseling Center with assistance from the Advocate as needed. Support groups are led by qualified persons who are trained and supervised by the Advocate and Director of Counseling.

The Wellness Center

Any professional counselors working in the Wellness Center must attend an approved program on the counseling of sexual offense reporting parties.

Employee Resources

Prudential's Employee Assistance program, offered by ComPsych, helps you and your family cope with life, from the everyday to the unexpected. Whether managing everyday issues such as job pressures, relationships, retirement planning, or finding childcare, or faced with grief, loss, or the impact of a disability, ComPsych is your resource for professional support. You and your family, including spouse and dependents, have access to ComPsych at no additional cost to you as long as your employer offers a covered product from Prudential. Professionals are available 24/7 and 365 days a year. Referrals may be made to appropriate professionals for up to 3 in-person visits, per year, per occurrence at no cost to the employee.

- ComPsych's Website: <https://www.compsych.com/>
- Guidance Resources' Website: <https://www.guidanceresources.com/>
- Hotline: 800-311-4327
- Human Resource Department: 314-246-6961 or benefits@webster.edu

Community Resources

There are a number of resources in the St. Louis community for those who have experienced sexual harassment. Such resources include:

ALIVE

<https://alivestl.org/>

St. Louis 24-hour Crisis Line: 314-993-2777

P.O. Box 28733, St. Louis, MO 63146 Office: 314-993-7080 Fax: 314-567-5629

Provides counseling, emergency sanctuary and other critical services to adults and children impacted by domestic abuse. ALIVE's services include:

- a 24-hour crisis line.
- emergency sanctuary
- emergency transportation.
- individual and group adult counseling.
- a children's treatment program.
- court advocacy.
- community education and outreach.

1 in 6

<https://1in6.org/>

901 E. Saint Louis, Floor 3, Springfield, MO 65806

877-628-1in6 or 877-628-1466

- 24/7 crisis chat available
- 1 in 6 offers resources and an online anonymous chat helpline for males/men who are survivors of childhood sexual abuse and sexual assault. 1 in 6 offers anonymous support groups online as well.

Safe Connections

<https://safeconnections.org/>

2165 Hampton Ave., St. Louis, MO 63139 314-646-7500

Safe Connections reduces the impact and incidence of relationship violence and sexual assault through education, crisis intervention, counseling, and support services. Safe Connections' services include:

- 24-hour crisis hotline: 314-531-2003
- therapy free of charge to adults and youth of all genders ages 12+ who have experienced rape, domestic or dating abuse (physical, sexual or emotional), sex trafficking, and/or childhood sexual abuse.
- groups, classes and workshops for adults and youth of all genders ages 12+ who have experienced rape, domestic or dating abuse, sex trafficking, and/or childhood sexual abuse. Through these group programs, clients receive professional guidance and peer social support in a safe environment. Additionally, group services are open to survivors of all genders and all support services are free of charge.

There are similar resources in each of the communities in which Webster maintains campuses. Resources may also be found at <https://www.webster.edu/titleix/resources.php>. The Sexual Offense Advocate can assist in locating additional resources.

Prevention and Education Resources

The University prohibits the offenses of sexual assault, dating violence, domestic violence and stalking (as defined by the Clery Act) and reaffirms its commitment to maintaining a campus environment that emphasizes the safety of all members of our University community. We place a strong emphasis on education and prevention programs geared toward minimizing such offenses. In accordance with the University's philosophy and obligations, programming and training about this Policy, standards of conduct, reporting options, resources and prevention efforts are required for all students, faculty and employees, including incoming students and new faculty and employees. Such trainings cover topics such as: key definitions 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. In addition to that, employees also receive training on the roles and obligations of responsible employees and campus security authorities as well as their responsibilities under Title VII, Title IX, the Clery Act and the Violence Against Women Act. Webster University expects that any employee of the University who learns of an allegation of sexual harassment as defined by this policy, will immediately make a report to the Title IX Coordinator or Chief Human Resources Officer.

APPENDIX B: TITLE IX

Contact Information for Policy Violations Related to Sexual Harassment

Sexual Offense Advocate (24/7)

470 E. Lockwood Ave.
St. Louis, MO 63119
314-968-7030 (office)
314-649-8474 (mobile)

Office of Public Safety (24/7)

527 Garden Avenue
(Next to Entrance to Garden Ave. Garage)
St. Louis, MO 63119
314-968-7430
314-968-6911 (emergency)

Kimberley Bynum-Smith

Director, Office for Civil Rights Compliance and Title IX Coordinator
200 Hazel, 2nd Floor
St. Louis, MO 63119 314-246-7780
kimberleybynumsmith@webster.edu

Charles Burton

Chief Human Resources Officer
470 E. Lockwood Ave.
St. Louis, MO 63119
314-246-6960 (office)
charlesburton@webster.edu

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 assault, or stalking. This is commonly referred to as bystander intervention. Bystander intervention means safe and positive options that may be carried out by an individual or individuals to prevent harm or intervene when there is a risk of dating violence, domestic violence, sexual assault or stalking.

Bystander intervention includes recognizing situations of potential harm, understanding institutional structures and cultural conditions that facilitate violence, overcoming barriers to intervening, identifying safe and effective intervention options, and taking action to intervene. 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 D 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 several 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 Department of Public Safety also operates a Campus Safe Walk Service as previously described in this Report.

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,²¹ 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 through Safe Colleges. The online course reviews Webster University community expectations, directs students to campus support and prevention resources, provides contact information for the Title IX Coordinator, and provides Bystander Intervention techniques.

All Webster University employees receive online training and are aware of their obligation to report sexual harassment on campus to the Title IX Coordinator. This online course covers the key elements of the following federal statutes: Title IX, the Clery Act, the Violence Against Women Act and Campus SaVE and Title VII. It also addresses employee rights and responsibilities as well as the specific roles and responsibilities of responsible employees.

Primary Prevention and Awareness Programs Offered in 2024:

Primary Prevention/Awareness Programming – Employees

Program Name	Date	Behavior Covered	Description of Program
Webster Professional Development Series Online	At hire	DoV, DaV, SA, S	Defines sexual assault, domestic/dating violence, stalking and how to report on campus.

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

Primary Prevention/Awareness Programming – Students

Program Name	Date	Behavior Covered	Description of Program
Online new student orientation	-	SA	Students receive an overview of Webster's sexual assault/harassment policies, including applicable definitions.
Webster 101	-	SA, DaV, DoV	A Title IX Coordinator joined each Webster 101 class for two sessions to discuss Webster's Title IX Policy and provide information related to sexual misconduct and prevention. This also included a case study.

* DaV (Dating Violence) DoV (Domestic Violence) SA (Sexual Assault) S (Stalking)

Ongoing 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 several 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.

Ongoing prevention and awareness campaigns begin as soon as students return to campus each fall.

Ongoing Prevention and Awareness Programming Offered in 2024: Ongoing Prevention/Awareness Programming for Students/Employees

Program Name	Date	Behavior Covered	Description of Program
Women's Basketball Green Dot Bystander Intervention	1/11/24	DV/DA/SA/ Stalking	This discussion and activity-packed bystander intervention training leads with hope and the belief that we have the power to create culture change. Participants build skill in four areas: (1) identifying red dots/flags of dating violence, sexual violence, and stalking; (2) identifying their own personal barriers to intervention; (3) selecting realistic intervention strategies; and (4) building a proactive anti-violence culture. Only available to Women's Basketball Team Members
Men's Basketball Green Dot Bystander Intervention	1/12/24	DV/DA/SA/ Stalking	This discussion and activity-packed bystander intervention training leads with hope and the belief that we have the power to create culture change. Participants build skill in four areas: (1) identifying red dots/flags of dating violence, sexual violence, and stalking; (2) identifying their own personal barriers to intervention; (3) selecting realistic intervention strategies; and (4) building a proactive anti-violence culture. Only available to Men's Basketball Team Members
Library Staff Green Dot Bystander Intervention	1/11/24	DV/DA/SA/ Stalking	This discussion and activity-packed bystander intervention training leads with hope and the belief that we have the power to create culture change. Participants build skill in four areas: (1) identifying red dots/flags of dating violence, sexual violence, and stalking; (2) identifying their own personal barriers to intervention; (3) selecting realistic intervention strategies; and (4) building a proactive anti-violence culture. Only available to Library Staff
Stalking social media posts	1/19 & 1/23/24	Stalking	Posted information about how stalking is romanticized in media and how that can be harmful to a survivor as well as stalking statistics broken down by gender and sexual orientation.
Involvement Fair	1/24/24	SA/Stalking	Provided information on bystander intervention, provided handouts on stalking, campus and community resources, Start by Believing Pledges, and Gorloks Aware. Open to all
What Would You Do? Info Table	1/25/24	Stalking	At this info table, participants answer what they would do when faced with a bystander intervention scenario specific to stalking. Handed out victim services brochures and Green Dot pledges. Open to all.
What Would You Do? Info Table	1/29/24	Stalking	At this info table, participants answer what they would do when faced with a bystander intervention scenario specific to stalking. Handed out victim services brochures and Green Dot pledges. Open to all.
What Would You Do? Info Table	1/30/24	Stalking	At this info table, participants answer what they would do when faced with a bystander intervention scenario specific to stalking. Handed out victim services brochures and Green Dot pledges. Open to all.

Program Name	Date	Behavior Covered	Description of Program
Webster Staff Alliance Board Green Dot Bystander Intervention	1/30/24	DV/DA/SA/ Stalking	This discussion and activity-packed bystander intervention training leads with hope and the belief that we have the power to create culture change. Participants build skill in four areas: (1) identifying red dots/flags of dating violence, sexual violence, and stalking; (2) identifying their own personal barriers to intervention; (3) selecting realistic intervention strategies; and (4) building a proactive anti-violence culture. Only available to Webster Staff Alliance members.
University Center Staff Green Dot Bystander Intervention	1/30/24	DV/DA/SA/ Stalking	This discussion and activity-packed bystander intervention training leads with hope and the belief that we have the power to create culture change. Participants build skill in four areas: (1) identifying red dots/flags of dating violence, sexual violence, and stalking; (2) identifying their own personal barriers to intervention; (3) selecting realistic intervention strategies; and (4) building a proactive anti-violence culture. Only available to University Center Staff
Men's Golf Team Green Dot Bystander Intervention	1/30/24	DV/DA/SA/ Stalking	This discussion and activity-packed bystander intervention training leads with hope and the belief that we have the power to create culture change. Participants build skill in four areas: (1) identifying red dots/flags of dating violence, sexual violence, and stalking; (2) identifying their own personal barriers to intervention; (3) selecting realistic intervention strategies; and (4) building a proactive anti-violence culture. Only available to Men's Gold Team members.
Men's Baseball Green Dot Bystander Intervention	1/30/24	DV/DA/SA/ Stalking	This discussion and activity-packed bystander intervention training leads with hope and the belief that we have the power to create culture change. Participants build skill in four areas: (1) identifying red dots/flags of dating violence, sexual violence, and stalking; (2) identifying their own personal barriers to intervention; (3) selecting realistic intervention strategies; and (4) building a proactive anti-violence culture. Only available to Men's Baseball Team members
Safe Sex and Safe Love Presentation	2/7/24	SA/DV/DA	Presented information on consent and kink-related consent tactics. Explored healthy and unhealthy behaviors through the lens of different types of relationships. Open to all students in housing.
Spring Break Safety Party	3/6/24	DV/DA/SA/ Stalking	Students answered bystander intervention scenarios tailored to situations that may come up during spring break. Open to all.

Program Name	Date	Behavior Covered	Description of Program
Men's and Women's Cross Country & Track and Field Teams Green Dot Bystander Intervention	3/8/24	DV/DA/SA/ Stalking	This discussion and activity-packed bystander intervention training leads with hope and the belief that we have the power to create culture change. Participants build skill in four areas: (1) identifying red dots/flags of dating violence, sexual violence, and stalking; (2) identifying their own personal barriers to intervention; (3) selecting realistic intervention strategies; and (4) building a proactive anti-violence culture. Only available to Men's and Women's Cross Country & Track and Field Team members.
Professional Development Day Resource Fair	3/13/24	DV/DA/SA/ Stalking	Provided information about bystander intervention and upcoming trainings, victim services, and program prevention education. Open to all.
Women's Volleyball Green Dot Bystander Intervention	3/18/24	DV/DA/SA/ Stalking	This discussion and activity-packed bystander intervention training leads with hope and the belief that we have the power to create culture change. Participants build skill in four areas: (1) identifying red dots/flags of dating violence, sexual violence, and stalking; (2) identifying their own personal barriers to intervention; (3) selecting realistic intervention strategies; and (4) building a proactive anti-violence culture. Only available to Men's and Women's Cross Country & Track and Field Team members.
Men's and Women's Green Dot Bystander Intervention	3/19/24	DV/DA/SA/ Stalking	This discussion and activity-packed bystander intervention training leads with hope and the belief that we have the power to create culture change. Participants build skill in four areas: (1) identifying red dots/flags of dating violence, sexual violence, and stalking; (2) identifying their own personal barriers to intervention; (3) selecting realistic intervention strategies; and (4) building a proactive anti-violence culture. Only available to Men's and Women's Tennis Team members.
Ladies Night Out	3/22/24	DV/DA/SA/ Stalking	This event focused on building positive healthy relationships for women, self-care, and connection to victim services. Open to all.
Sex BINGO	4/1/24	DV/DA/SA/ Stalking	This event focused on providing information about healthy and unhealthy relationship behaviors, consent, on campus resources, and healthy sexuality. Open to all.
Start by Believing Pledge Walk	4/3/24	SA	Provided Start by Believing pledges to campus community members and discussed the importance of starting by believing survivors when they disclose what happened to them. Open to all.
Sexual Assault Awareness Month Resource Fair	4/3/24	SA	Staff from Office for Civil Rights Compliance, Counseling and Life Development, Student Conduct, Public Safety, ALIVE, Safe Connections, Housing, Webster Groves Police, MCISA, and Gorloks Aware provided information on bystander intervention, Start by Believing pledges, and campus and community resources for survivors of sexual assault. Open to all.

Program Name	Date	Behavior Covered	Description of Program
Admitted Student Day Presentation	4/5/24	DV/DA/SA/ Stalking	Provided overview of prevention education and on campus resources to prospective students and their support systems. Open to all.
Admitted Student Day Info Table	4/5/24	DV/DA/SA/ Stalking	Provided information about campus and community resources as well as prevention education information to prospective students and their support systems. Facilitated bystander intervention scenarios. Explained program. Open to all.
What Would You Do? Info Table	4/11/24	SA	At this info table, participants answer what they would do when faced with a bystander intervention scenario specific to sexual assault. Handed out victim services brochures and Start by Believing pledges. Open to all.
Culture Chat Sneaky Links	4/12/24	DV/DA/SA/ Stalking	A discussion based program in which participants explore healthy and unhealthy behaviors through the lens of different types of relationships such as hook ups, "situationships", and defined partnerships. Open to all.
Trauma Sensitive Yoga	4/15/24	DV/DA/SA/ Stalking	DeafLead facilitated this holistic healing yoga session. Trauma Center Trauma Sensitive Yoga (TCTSY) is the first yoga-based empirically validated, clinical intervention for complex trauma or chronic, treatment-resistant post-traumatic stress disorder (PTSD). Open to all.
What Would You Do? Info Table	4/22/24	SA	At this info table, participants answer what they would do when faced with a bystander intervention scenario specific to sexual assault. Handed out victim services brochures and Start by Believing pledges. Open to all.
What Would You Do? Info Table	4/23/24	SA	At this info table, participants answer what they would do when faced with a bystander intervention scenario specific to sexual assault. Handed out victim services brochures and Start by Believing pledges. Open to all.
Open Green Dot Bystander Intervention	4/24/24	DV/DA/SA/ Stalking	This discussion and activity-packed bystander intervention training leads with hope and the belief that we have the power to create culture change. Participants build skill in four areas: (1) identifying red dots/flags of dating violence, sexual violence, and stalking; (2) identifying their own personal barriers to intervention; (3) selecting realistic intervention strategies; and (4) building a proactive anti-violence culture. Open to all.
What Would You Do? Info Table	4/29/24	SA	At this info table, participants answer what they would do when faced with a bystander intervention scenario specific to sexual assault. Handed out victim services brochures and Start by Believing pledges. Open to all.

Program Name	Date	Behavior Covered	Description of Program
Family Violence Class Green Dot Bystander Intervention	4/29/24	DV/DA/SA/Stalking	This discussion and activity-packed bystander intervention training leads with hope and the belief that we have the power to create culture change. Participants build skill in four areas: (1) identifying red dots/flags of dating violence, sexual violence, and stalking; (2) identifying their own personal barriers to intervention; (3) selecting realistic intervention strategies; and (4) building a proactive anti-violence culture. Only available to individuals in the Family Violence class.
Gentleman's Club	4/30/24	DV/DA/SA/Stalking	This event, focused on engaging men as allies in violence prevention and connecting male survivors to victim services, was a facilitated discussion on the impact R&B music has on how our community views and engages in sex and relationships, even after relationships end. Free haircuts from a barber were provided. Open to all.
Awareness Month Resource Fair	10/2024	DV/DA/SA	Staff from Office for Civil Rights Compliance, Counseling and Life Development, Student Conduct, Public Safety, ALIVE, Safe Connections, Housing, and Gorloks Aware provided information on bystander intervention, Start by Believing pledges, and campus and community resources for survivors of dating and domestic violence. Open to all.
International Student Orientation Resource Table	10/2024	DV/DA/SA/S	Provided information on bystander intervention, campus and community resources, and Gorloks Aware. Open to all.

DaV (Dating Violence) DoV (Domestic Violence) SA (Sexual Assault) S (Stalking)

Prevention & Awareness Programming offered in 2024:

All programming listed above was open to students, faculty and staff.

Additional presentations or education materials are always available to any student group or University department by contacting the Title IX Coordinator.

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.

Missouri Sex Offender Registry

In response to Section 121 of the Adam Walsh Child Protection and Safety Act of 2006 (42 U.S.C 16921), the Revised Statutes of Missouri, Chapter 589 Sections 400 to 425 and 43.650, RSMo., mandates that the Missouri State Highway Patrol (MSHP) must maintain a sex offender database and a website on the Internet that is accessible to the public. This database can be accessed at: <https://www.mshp.dps.missouri.gov/MSHPWeb/PatrolDivisions/CRID/crimRecChk.html>

WEBSTER GROVES CAMPUS ANNUAL FIRE SAFETY REPORT

This section of the Annual Security and Fire Safety Report includes information on the University's Clery reportable fire statistics for 2022-2024 occurring in student residential facilities as well as information about fire safety policies and procedures for those facilities. The statistics included in the Annual Security and Fire Safety Report are compiled by the Department of Public Safety (DPS) with assistance from Housing & Residential Life.

Explanation of the 2022-2024 Fire Statistics Reporting Tables

Institutions with on campus student housing facilities must disclose annual statistics for fires based on: 1) where the fire occurred, 2) the type of flame or burning which occurred. Institutions are only required to collect and provide statistics for fires which took place in an on-campus student housing facility. The statistics are broken down separately by student housing facility. For the purposes of Clery Act fire safety reporting, a reportable "fire" is defined as any instance of open flame or other burning in a place not intended to contain the burning, or any instance of open flame or other burning in an uncontrolled manner. Note that incidents involving sparks or smoke where there is no open flame or other burning, and incidents such as burnt microwave popcorn that trigger fire alarms or smoke detectors but where there are no open flames or other burning do not qualify as a fire under this definition.

2024 Fire Statistics for On-Campus Student Housing Facilities

Name of On-Campus Student Housing Facility & Address	Total Fires	Fire #	Cause & category of Fire	# of Injuries that Required Treatment at a Medical Center	# of Deaths Related to Fire	Value of Property Damage Caused by Fire
BIG BEND APTS (#1) 7857 Big Bend Blvd	0	0	0	0	0	0
BIG BEND APTS (#2) 7861 Big Bend Blvd.	0	0	0	0	0	0
BIG BEND APTS (#3) 7865 Big Bend Blvd.	0	0	0	0	0	0
GLEN PARK APTS 129 E. Lockwood Ave.	0	0	0	0	0	0
WEST HALL 240 Edgar Rd.	0	0	0	0	0	0
EAST HALL 230 Edgar Rd.	0	0	0	0	0	0
MARIA HALL 470 E. Lockwood Ave.	0	0	0	0	0	0
WEBSTER VILLAGE APTS (#1) 150 Edgar Rd.	0	0	0	0	0	0
WEBSTER VILLAGE APTS (#2) 158 Edgar Rd.	0	0	0	0	0	0
WEBSTER VILLAGE APT (#3) 200 Edgar Rd.	0	0	0	0	0	0
WEBSTER VILLAGE APTS (#4) 212 Edgar Rd.	0	0	0	0	0	0
WEBSTER VILLAGE APTS (#5) 227 Edgar Rd.	0	0	0	0	0	0
WEBSTER VILLAGE APT (#6) 163 Hazel Rd.	0	0	0	0	0	0
GARDEN AVENUE APARTMENTS E2, F2, F1, G2, G1, H2, H1, J1 627 Garden Avenue	0	0	0	0	0	0
DUNHAN HALL APT 303 & 201 459 Lockwood Ave	0	0	0	0	0	0

CAVEAT: Garden Avenue Apartments was in use from September 2024 - May 2025. Glen Park Apartments were occupied From January - July 31, 2024. Dunhan Hall was occupied from January - May 2024 and Aug - Dec 2024 Schultz Hall.

2023 Fire Statistics for On-Campus Student Housing Facilities

Name of On-Campus Student Housing Facility & Address	Total Fires	Fire #	Cause & category of Fire	# of Injuries that Required Treatment at a Medical Center	# of Deaths Related to Fire	Value of Property Damage Caused by Fire
BIG BEND APTS (#1) 7857 Big Bend Blvd	0	0	0	0	0	0
BIG BEND APTS (#2) 7861 Big Bend Blvd.	0	0	0	0	0	0
BIG BEND APTS (#3) 7865 Big Bend Blvd.	0	0	0	0	0	0
GLEN PARK APTS 129 E. Lockwood Ave.	0	0	0	0	0	0
WEST HALL 240 Edgar Rd.	0	0	0	0	0	0
EAST HALL 230 Edgar Rd.	0	0	0	0	0	0
MARIA HALL 470 E. Lockwood Ave.	0	0	0	0	0	0
WEBSTER VILLAGE APTS (#1) 150 Edgar Rd.	0	0	0	0	0	0
WEBSTER VILLAGE APTS (#2) 158 Edgar Rd.	0	0	0	0	0	0
WEBSTER VILLAGE APT (#3) 200 Edgar Rd.	1	1	Small cooking fire; Food in oven	0	0	75.00
WEBSTER VILLAGE APTS (#4) 212 Edgar Rd.	0	0	0	0	0	0
WEBSTER VILLAGE APTS (#5) 227 Edgar Rd.	1	1	Arson; Table intentionally set on fire	0	0	50.00
WEBSTER VILLAGE APT (#6) 163 Hazel Rd.	0	0	0	0	0	0
DUNHAM HALL APARTMENTS 303 (#7) 459 E Lockwood	0	0	0	0	0	0
SCHULTZ HALL APARTMENTS 112, 113, 115, 212, 213, 215 (#8) 483 E Lockwood	0	0	0	0	0	0

CAVEAT: Dunham Hall and Schultz Hall were only in use from Aug 2023 - May 31, 2024

2022 Fire Statistics for On-Campus Student Housing Facilities

Name of On-Campus Student Housing Facility & Address	Total Fires	Fire #	Cause & category of Fire	# of Injuries that Required Treatment at a Medical Center	# of Deaths Related to Fire	Value of Property Damage Caused by Fire
BIG BEND APTS (#1) 7857 Big Bend Blvd	0	0	0	0	0	0
BIG BEND APTS (#2) 7861 Big Bend Blvd.	0	0	0	0	0	0
BIG BEND APTS (#3) 7865 Big Bend Blvd.	0	0	0	0	0	0
GLEN PARK APTS 129 E. Lockwood Ave.	0	0	0	0	0	0
WEST HALL 240 Edgar Rd.	0	0	0	0	0	0
EAST HALL 230 Edgar Rd.	0	0	0	0	0	0
MARIA HALL 470 E. Lockwood Ave.	0	0	0	0	0	0
WEBSTER VILLAGE APTS (#1) 150 Edgar Rd.	1	1	Small Cooking fire; unintentional	0	0	0
WEBSTER VILLAGE APTS (#2) 158 Edgar Rd.	0	0	0	0	0	0
WEBSTER VILLAGE APT (#3) 200 Edgar Rd.	0	0	0	0	0	0
WEBSTER VILLAGE APTS (#4) 212 Edgar Rd.	0	0	0	0	0	0
WEBSTER VILLAGE APTS (#5) 227 Edgar Rd.	0	0	0	0	0	0
WEBSTER VILLAGE APT (#6) 163 Hazel Rd.	1	1	Small Cooking fire; unintentional	0	0	0
NORTH HALL APARTMENTS 61 N Bompat	0	0	0	0	0	0

CAVEAT: North Hall was in use from September 2018 - May, 31, 2021

Fire Log

Up to date information regarding fires reported in student housing facilities is also publicly available year-round in a Daily Crime Log maintained by DPS. The Fire Log records, by the date the fire was reported to DPS, certain information regarding any fires which are reported to have taken place in any on-campus student housing facility. The Fire Log is maintained in the same document as the University's Daily Crime Log. The most recent 60 days of the Fire Log are available for public inspection in the DPS office 24 hours a day, seven days a week, except during certain holidays and when the campus is closed. Requests to view entries from more than 60 days ago, will be provided within twobusiness days of the request.

FIRE SAFETY POLICIES AND PROCEDURES

This section of the Annual Security and Fire Safety Report provides information on the specific fire safety systems included in each on-campus student housing facility, information on how to report a fire to the University, and general fire safety policies and procedures.

How to Report a Fire to the University

The following pages address the University's procedures which should be followed by the campus community in case of an active suspected fire on campus. Reporting any observed fire or smoke to DPS or local emergency responders is key. **It is also important for members of the campus community to report evidence of a fire that has already been extinguished to DPS any time that individual is unsure whether DPS is already aware of the fire.** This can be done by calling the DPS emergency line (314-968- 6911) if you believe the extinguished fire poses a danger to yourself or others, or by calling the non- emergency line at 314-246-7430. DPS will send an officer to the scene to investigate and document the incident. This will ensure the safety of the campus community and also allow DPS to determine whether or not the incident should be included in the annual fire safety report statistics.

General Procedures to Follow in Case of Fire

Anyone who observes fire or smoke inside Webster University facilities should take the following steps:

1. Immediately go to the nearest fire alarm pull station and activate the fire alarm, if it is possible to do so safely.
2. Extinguish the fire only if you can do so safely and quickly.
3. Immediately contact DPS at the emergency number (X6911 from an internal phone) or 314-968- 6911.

All University students, staff, faculty and guests are required to heed a fire alarm and evacuate a building immediately. Remember to use the nearest stairwell and/or exit to leave the building immediately. DPS strongly encourages all members of the campus community to familiarize themselves with the exits in each building.

Faculty members and department heads are responsible for the students and staff in their charge and should evacuate their classrooms and offices in an orderly manner to the nearest designated evacuation route and assembly point. Faculty members and department heads are also responsible for keeping all students and staff in their assembly area until recalled to the building or advised by emergency personnel of where to go. If students or staff want to leave, or are dismissed, it is the responsibility of the faculty member or department head to record the student or staff member's name in a log.

Anyone inside a Webster University student housing facility should take the following steps if a fire alarm sounds:

1. Evacuate the building as quickly and as orderly as possible. Do not use the elevators.
2. Before leaving your room or apartment, check your door. If it feels warm, do not open it. A warm door may indicate smoke and flames on the other side.
3. If your door does not feel warm, open it cautiously to check for smoke outside or in the hallway.
4. Upon exiting your room or apartment, be sure you have closed your window and locked your door.
5. If you believe that the area outside your door is passable, alert the other occupants on your floor/building and proceed to the closest exit stairway.
6. You may use any exterior door to exit a building when the fire alarm is sounding.

7. After you leave the building, keep a safe distance away from it and do not interfere with the fire department or public safety operations. Return to the building only when told it is safe to do so by a member of the Housing & Residential Life professional staff or DPS.
8. Residents who do not evacuate the halls or apartments during a fire alarm are subject to fines and disciplinary action.

If you discover a fire in a student housing facility:

1. Go to the nearest alarm box, follow the instructions printed on the box, and activate the alarm. Evacuate the building immediately and do not use an elevator.
2. As soon as it is safe to do so, call DPS (x6911 or 314-968-6911) and give the exact location of the fire and notify a member of the residential life staff.
3. If your door is warm or if the hallway is smoke-filled, stay in your room with your door closed. Seal cracks around the door with towels or sheets to keep the smoke from entering the room.
4. If smoke does enter your room, open one window slightly. Hang something noticeable out the window like a towel or sheet to indicate your exact location to fire fighters.
5. If you cannot open the window, remain close to the floor. The best breathing air will be approximately 18 inches above the floor.
6. Above all, remain calm. The Webster Groves Fire Department is very familiar with all campus housing and will be on the scene immediately directing rescue operations.

Procedures for Evacuating Student Housing Facilities in Case of Fire

All occupants of a residence hall or any of the on-campus apartment complexes must immediately evacuate the building when an alarm sounds. Whenever an alarm sounds in one of the residence halls or the Webster Village Apartments, all RAs available at the time will knock on resident doors, informing them of the need to evacuate, provided it is safe to do so. DPS will support the RAs and any available professional HRL staff in ushering people outside and keeping them assembled in the designated evacuation location.

Whenever an alarm sounds in an apartment at Glen Park or Big Bend Apartments, all occupants must immediately evacuate the building and should immediately contact Public Safety on the emergency line at 314-968-6911. Public Safety will contact the Webster Groves Fire Department and coordinate a response to the emergency with that department and HRL. All residents should remember to walk (not run) during evacuations and be sure to use stairwells (not elevators) when evacuating the buildings during a fire alarm or other emergency. Additional information HRL's Emergency Procedures is available at: <https://www.webster.edu/housing/policies-procedures.php#emergency>

Residents with disabilities that could affect their ability to evacuate in case of emergency should contact the Office of Housing & Residential Life (HRL) at 314-246-4663 prior to move in (or as soon as possible after becoming injured or disabled). HRL will work with the Academic Resource Center (ARC) to develop a plan for assisting the resident during emergency drills and/or emergency situations.

Emergency evacuation route signage is visible on residence hall room doors, and evacuation point signage is posted at designated assembly points.

Evacuation meeting points for all on campus student housing facilities appear below:

Building	Evacuation Location
Webster Village Buildings # 1, 2, and 6	The parking lot behind the pool and in front of building 6.
Webster Village Buildings # 3, 4, and 5	The parking lot between buildings 5 and 6.
East Hall	The parking lot to the north of West Hall.
West Hall	The parking lot to the east of East Hall.
Maria Hall	The area near the Facilities Services Building.
Garden Avenue Apartments	Grassy area by the parking lot.
Big Bend Apartments	Across Big Bend on the south side in the parking lot adjacent to the White Bluff Apartments.
Eden Schultz Hall	Field next to Schultz Hall.

Misuse of the fire alarm and protection equipment (which includes fire alarms and fire extinguishers) constitutes a serious threat to the safety of the occupants of a building and is prohibited. Any activity involving tampering with fire alarms or firefighting equipment, unauthorized use of such equipment, failure to evacuate during a fire alarm, hindering the evacuation of other occupants, or hindering authorized emergency personnel is prohibited, and will result in severe disciplinary action, including possible dismissal from Webster University along with possible criminal prosecution. Criminal prosecution may subject the violator to fines, imprisonment, or both. Civil action to recover the costs associated with damage resulting from the unauthorized use of firefighting equipment may also be initiated.

Current Student Housing Facilities Fire Safety Systems

The University takes proactive measures to ensure the safety of its residents within the student housing facilities. One key component to resident's safety is maintaining appropriate fire safety systems and drills. Fire drills are intended to familiarize students with the locations of the emergency exits within their building and to provide guidance about the direction occupants should travel when exiting the facility. The University conducts fire evacuation drills in all three residence halls and the Webster Village Apartments each fall in collaboration with the Webster Grove Fire Department. DPS also designates one of its staff members as the University's Fire Safety Specialist who is responsible for coordinating routine maintenance and annual testing of all fire safety systems including the on campus (not just those in student housing facilities) in collaboration with an outside fire protection company. The Fire Safety Specialist also works with this vendor to perform extensive obstruction testing of all sprinkler systems on campus every five years.

See below for details regarding the specific fire safety systems currently in place in each on campus student housing facility. The University does not anticipate a need for future improvements to fire safety systems at this time.

On Campus Student Housing Facilities	Fire Alarm Monitoring Done Off Site (Tech Electronics)	Partial 1 Sprinkler System ¹	Full 2 Sprinkler System ²	Smoke Detection	Fire Extinguisher Devices ³	Evacuation Plans & Placards	Number of Evacuation (fire) drills held during 2023
MARIA HALL 470 E. Lockwood Ave.	x	-	x	x	x	x	1
WEST HALL 240 Edgar Rd.	x	-	x	x	x	x	1
EAST HALL 230 Edgar Rd.	x	-	x	x	x	x	1
WEBSTER VILLAGE APTS (#1) 150 Edgar Rd.	x	-	x	x	x	-	1
WEBSTER VILLAGE APTS (#2) 158 Edgar Rd.	x	-	x	x	x	-	1
WEBSTER VILLAGE APT (#3) 200 Edgar Rd.	x	-	x	x	x	-	1
WEBSTER VILLAGE APTS (#4) 212 Edgar Rd.	x	-	x	x	x	-	1
WEBSTER VILLAGE APTS (#5) 227 Edgar Rd.	x	-	x	x	x	-	1
WEBSTER VILLAGE APT (#6) 163 Hazel Rd.	x	-	x	x	x	-	1

1 Partial sprinkler system is defined as having sprinklers in the common areas only.

2 A full sprinkler system is defined as having sprinklers in both common and individual rooms.

3 In the residence halls, fire extinguishers are located on each floor. The fire extinguishers included in the Webster Village Apartments are placed in the kitchen.

On Campus Student Housing Facilities	Fire Alarm Monitoring Done Off Site (Tech Electronics)	Partial 1 Sprinkler System ¹	Full 2 Sprinkler System ²	Smoke Detection	Fire Extinguisher Devices ³	Evacuation Plans & Placards	Number of Evacuation (fire) drills held during 2024
GARDEN AVENUE APARTMENTS 687 Garden Avenue	-	-	-	X	-	-	0 ⁴
BIG BEND APTS (#1) 7857 Big Bend Blvd	-	-	-	X	-	-	0
BIG BEND APTS (#2) 7861 Big Bend Blvd.	-	-	-	X	-	-	0
BIG BEND APTS (#3) 7865 Big Bend Blvd.	-	-	-	X	-	-	0
SCHULTZ HALL APARTMENTS 483 E Lockwood	-	-	-	X	-	-	0 ⁵
DUNHAM HALL APARTMENTS 303 (#8) 459 E Lockwood	-	-	-	X	-	-	0 ⁶

Fire Safety Policies for Student Housing Facilities

Another important component of fire safety involves maintaining appropriate fire safety policies. The following Residential Life fire safety policies are taken from the Residential Life Student Handbook.

1 A partial sprinkler system is defined as having sprinklers in the common areas only

2 A full sprinkler system is defined as having sprinklers in both common and individual rooms.

3 In the residence halls, fire extinguishers are located on each floor. The fire extinguishers included in the Webster Village Apartments are placed in the kitchen

4 This Facility housed students from Aug 2024 - May 2025

5 This facility housed students from August 2022 - May 2024

6 This facility housed students from August 2022 - May 2024

Appliances

In seeking to provide a safe living and learning environment, Webster University limits the appliances that may be used within residential facilities. Appliances with exposed or open heating elements are not permitted, except for coffee makers with an automatic shut off function.

Microwaves are permitted within individual residence hall rooms at one per room.

Individuals residing in the Webster Village, Glen Park and Big Bend Apartments are permitted to have microwaves, toasters, and university provided appliances.

Residence hall rooms are limited to one refrigerator per room. Refrigerators may have a maximum capacity of 5.0 cubic feet and must be Energy Star rated.

Smoking on any university owned property is prohibited as Webster University is a smoke-free, tobacco-free campus.

Individuals may not possess or use hookahs, cigars, pipes, homemade/hand-rolled cigarettes on campus.

Candles, Incense, Open Flames

Due to the potential risk to the welfare of the campus community, devices with open flames or open heating elements are not allowed on campus. This includes unused items intended for decoration.

Flammable liquids such as gasoline and kerosene may not be kept in residential facilities.

Fire Safety Education and Training Programs

DPS and HRL work collaboratively to provide residents and Resident Assistants with fire safety education and training throughout the year. Resident Assistants are trained on a variety of safety and crime prevention topics by their own professional staff as well as by DPS. Prior to the start of the fall semester, Resident Assistants are required to complete training on fire safety, which includes required viewing of the Alarming Truth, a video funded under a Department of Homeland Security Fire Prevention and Safety grant and developed through the collaborative efforts of the Clery Center for Security On Campus, Campus Firewatch, Michael H. Minger Foundation, Rowan University, University of Pennsylvania, and the Philadelphia Fire Department.

DPS's Fire Prevention Specialist and other DPS staff members conduct fire safety training for the RAs and HRL professional staff before students move in each fall. This training covers what to do/what not to do in the case of a fire alarm or fire emergency in student housing facilities, including how to properly and safely use a fire extinguisher.

During the fall of 2024, HRL professional staff covered the following information with residents at orientation as they do each year:

- Explain that it is University policy that anytime a smoke alarm goes off, you must exit the building;
- Explain what will happen during an evacuation;
- Explain that residents can't leave evacuation location until they're cleared by fire department or public safety; and
- Discuss the consequences for misusing fire alarm and protection equipment.

Webster University also offers general fire safety education or training for employees upon request. Students, faculty and staff are all encouraged to review the general emergency procedures related to fire safety on the DPS website at <https://webster.edu/public-safety/crisis.php>. **General Fire Safety Tips are included in Appendix E.**

APPENDIX C – 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, Criminal Sexual Contact, 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.
- **Criminal Sexual Contact:** 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 violence¹ 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.

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.

¹ 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.

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.

Hazing

Any intentional, knowing, or reckless act committed by a person (whether individually or in concert with other persons) against another person or persons regardless of the willingness of such other person or persons to participate, that (1) is committed in the course of an initiation into, an affiliation with, or the maintenance of membership in, a student organization (e.g., a club, athletic team, fraternity, or sorority); and (2) causes or creates a risk, above the reasonable risk encountered in the course of participation in the IHE or the organization, of physical or psychological injury.

APPENDIX D – CRIME PREVENTION TIPS

While Webster University makes every effort to provide a safe campus, students, faculty, and staff must also do their part to help us maintain a safe environment. The University encourages everyone who attends, works or visits one of its campuses to follow basic personal and property crime prevention procedures.

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.
- 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 it to a fixed object.

APPENDIX E – MISSOURI STATUTES

556.061. Code definitions. [Preliminary Provisions (Criminal Code)] (Selected definitions only)

(14) “**Consent**”: consent or lack of consent may be expressed or implied. Assent does not constitute consent if:

- a) It is given by a person who lacks the mental capacity to authorize the conduct charged to constitute the offense and such mental incapacity is manifest or known to the actor; or
- b) It is given by a person who by reason of youth, mental disease or defect, intoxication, a drug-induced state, or any other reason is manifestly unable or known by the actor to be unable to make a reasonable judgment as to the nature or harmfulness of the conduct charged to constitute the offense; or
- c) It is induced by force, duress or deception;

(27) “**Forcible compulsion**” either:

- a) Physical force that overcomes reasonable resistance; or
- b) A threat, express or implied, that places a person in reasonable fear of death, serious physical injury or kidnapping of such person or another person;

(28) “**Incapacitated**”, a temporary or permanent physical or mental condition in which a person is unconscious, unable to appraise the nature of his or her conduct, or unable to communicate unwillingness to an act;

566.010. Chapter 566 and chapter 568 definitions. —

As used in this chapter and chapter 568, the following terms mean:

1. “**Aggravated sexual offense**”, any sexual offense, in the course of which, the actor:

- a) Inflicts serious physical injury on the victim;
- b) Displays a deadly weapon or dangerous instrument in a threatening manner;
- c) Subjects the victim to sexual intercourse or deviate sexual intercourse with more than one person;
- d) Had previously been found guilty of an offense under this chapter or under section 573.200, child used in sexual performance; section 573.205, promoting sexual performance by a child; section 573.023, sexual exploitation of a minor; section 573.025, promoting child pornography in the first degree; section 573.035, promoting child pornography in the second degree; section 573.037, possession of child pornography; or section 573.040, furnishing pornographic materials to minors; or has previously been found guilty of an offense in another jurisdiction which would constitute an offense under this chapter or said sections;
- e) Commits the offense as part of an act or series of acts performed by two or more persons as part of an established or prescribed pattern of activity; or
- f) Engages in the act that constitutes the offense with a person the actor knows to be, without regard to legitimacy, the actor’s:
 - a) Ancestor or descendant by blood or adoption;
 - b) Stepchild while the marriage creating that relationship exists;
 - c) Brother or sister of the whole or half blood; or
 - d) Uncle, aunt, nephew, or niece of the whole blood

2. “**Commercial sex act**”, any sex act on account of which anything of value is given to or received by any person;

3. “**Deviate sexual intercourse**”, any act involving the genitals of one person and the hand, mouth, tongue, or anus of another person or a sexual act involving the penetration, however slight, of the penis, female genitalia, or the anus by a finger, instrument or object done for the purpose of arousing or gratifying the

sexual desire of any person or for the purpose of terrorizing the victim;

4. **“Forced labor”**, a condition of servitude induced by means of:

- a) Any scheme, plan, or pattern of behavior intended to cause a person to believe that, if the person does not enter into or continue the servitude, such person or another person will suffer substantial bodily harm or physical restraint; or
- b) The abuse or threatened abuse of the legal process;

5. **“Sexual conduct”**, sexual intercourse, deviate sexual intercourse or sexual contact;

6. **“Sexual contact”**, any touching of another person with the genitals or any touching of the genitals or anus of another person, or the breast of a female person, or such touching through the clothing, or causing semen, seminal fluid, or other ejaculate to come into contact with another person, for the purpose of arousing or gratifying the sexual desire of any person or for the purpose of terrorizing the victim;

7. **“Sexual intercourse”**, any penetration, however slight, of the female genitalia by the penis.

566.023. Marriage to victim, at time of offense, affirmative defense, for certain offenses. –

It shall be an affirmative defense to prosecutions under sections 566.032, 566.034, 566.062, 566.064, and 566.071, that the defendant was married to the victim at the time of the offense.

566.030. Rape in the first degree, penalties--suspended sentences not granted, when. –

1. A person commits the offense of rape in the first degree if he or she has sexual intercourse with another person who is incapacitated, incapable of consent, or lacks the capacity to consent, or by the use of forcible compulsion. Forcible compulsion includes the use of a substance administered without a victim's knowledge or consent which renders the victim physically or mentally impaired so as to be incapable of making an informed consent to sexual intercourse.
2. The offense of rape in the first degree or an attempt to commit rape in the first degree is a felony for which the authorized term of imprisonment is life imprisonment or a term of years not less than five years, unless:
 - (1) The offense is an aggravated sexual offense, in which case the authorized term of imprisonment is life imprisonment or a term of years not less than fifteen years;
 - (2) The person is a persistent or predatory sexual offender as defined in section 566.125 and subjected to an extended term of imprisonment under said section;
 - (3) The victim is a child less than twelve years of age, in which case the required term of imprisonment is life imprisonment without eligibility for probation or parole until the offender has served not less than thirty years of such sentence or unless the offender has reached the age of seventy-five years and has served at least fifteen years of such sentence, unless such rape in the first degree is described under subdivision (4) of this subsection; or
 - (4) The victim is a child less than twelve years of age and such rape in the first degree or attempt to commit rape in the first degree was outrageously or wantonly vile, horrible or inhumane, in that it involved torture or depravity of mind, in which case the required term of imprisonment is life imprisonment without eligibility for probation, parole or conditional release.
3. Subsection 4 of section 558.019 shall not apply to the sentence of a person who has been found guilty of rape in the first degree or attempt to commit rape in the first degree when the victim is less than twelve years of age, and **“life imprisonment”** shall mean imprisonment for the duration of a person's natural life for the purposes of this section.
4. No person found guilty of rape in the first degree or an attempt to commit rape in the first degree shall be granted a suspended imposition of sentence or suspended execution of sentence.

566.031. Rape in the second degree, penalties. –

1. A person commits the offense of rape in the second degree if he or she has sexual intercourse with another person knowing that he or she does so without that person's consent.
2. The offense of rape in the second degree is a class D felony.

566.060 Sodomy in the first degree, penalties--suspended sentence not granted, when. –

1. A person commits the offense of sodomy in the first degree if he or she has deviate sexual intercourse with another person who is incapacitated, incapable of consent, or lacks the capacity to consent, or by the use of forcible compulsion. Forcible compulsion includes the use of a substance administered without a victim's knowledge or consent which renders the victim physically or mentally impaired so as to be incapable of making an informed consent to sexual intercourse.
2. The offense of sodomy in the first degree or an attempt to commit sodomy in the first degree is a felony for which the authorized term of imprisonment is life imprisonment or a term of years not less than five years, unless:
 - (1) The offense is an aggravated sexual offense, in which case the authorized term of imprisonment is life imprisonment or a term of years not less than ten years;
 - (2) The person is a persistent or predatory sexual offender as defined in section 566.125 and subjected to an extended term of imprisonment under said section;
 - (3) The victim is a child less than twelve years of age, in which case the required term of imprisonment is life imprisonment without eligibility for probation or parole until the offender has served not less than thirty years of such sentence or unless the offender has reached the age of seventy-five years and has served at least fifteen years of such sentence, unless such sodomy in the first degree is described under subdivision (4) of this subsection; or
 - (4) The victim is a child less than twelve years of age and such sodomy in the first degree or attempt to commit sodomy in the first degree was outrageously or wantonly vile, horrible or inhumane, in that it involved torture or depravity of mind, in which case the required term of imprisonment is life imprisonment without eligibility for probation, parole or conditional release.
3. Subsection 4 of section 558.019 shall not apply to the sentence of a person who has been found guilty of sodomy in the first degree or an attempt to commit sodomy in the first degree when the victim is less than twelve years of age, and "life imprisonment" shall mean imprisonment for the duration of a person's natural life for the purposes of this section.
4. No person found guilty of sodomy in the first degree or an attempt to commit sodomy in the first degree shall be granted a suspended imposition of sentence or suspended execution of sentence.

566.61 Sodomy in the second degree, penalty. –

1. A person commits the offense of sodomy in the second degree if he or she has deviate sexual intercourse with another person knowing that he or she does so without that person's consent.
2. The offense of sodomy in the second degree is a class D felony.

566.062 Statutory sodomy and attempt to commit, first degree, penalties. –

1. A person commits the offense of statutory sodomy in the first degree if he or she has deviate sexual intercourse with another person who is less than fourteen years of age.
2. The offense of statutory sodomy in the first degree or an attempt to commit statutory sodomy in the first

degree is a felony for which the authorized term of imprisonment is life imprisonment or a term of years not less than five years, unless:

- (1) The offense is an aggravated sexual offense or the victim is less than twelve years of age, in which case the authorized term of imprisonment is life imprisonment or a term of years not less than ten years; or
- (2) The person is a persistent or predatory sexual offender as defined in section 566.125 and subjected to an extended term of imprisonment under said section.

566.064. Statutory sodomy, second degree, penalty. –

1. A person commits the offense of statutory sodomy in the second degree if being twenty-one years of age or older, he or she has deviate sexual intercourse with another person who is less than seventeen years of age.
2. The offense of statutory sodomy in the second degree is a class D felony.

566.067 Child molestation, first degree, penalties. –

1. A person commits the offense of child molestation in the first degree if he or she subjects another person who is less than fourteen years of age to sexual contact and the offense is an aggravated sexual offense.
2. The offense of child molestation in the first degree is a class A felony and, if the victim is a child less than twelve years of age, the person shall serve his or her term of imprisonment without eligibility for probation, parole, or conditional release.

566.068 Child molestation, second degree, penalties. –

1. A person commits the offense of child molestation in the second degree if he or she:
Subjects a child who is less than twelve years of age to sexual contact; or
 - (1) Being more than four years older than a child who is less than seventeen years of age, subjects the child to sexual contact and the offense is an aggravated sexual offense.
 - (2) The offense of child molestation in the second degree is a class B felony.

566.069 Child molestation, third degree, penalty. –

1. A person commits the offense of child molestation in the third degree if he or she subjects a child who is less than fourteen years of age to sexual contact.
2. The offense of child molestation in the third degree is a class C felony, unless committed by the use of forcible compulsion, in which case it is a class B felony.

566.071. Child molestation, fourth degree, penalty. –

1. A person commits the offense of child molestation in the fourth degree if, being more than four years older than a child who is less than seventeen years of age, subjects the child to sexual contact.
2. The offense of child molestation in the fourth degree is a class E felony.

566.100. Sexual abuse in the first degree, penalties. –

1. A person commits the offense of sexual abuse in the first degree if he or she subjects another person to sexual contact when that person is incapacitated, incapable of consent, or lacks the capacity to consent, or by the use of forcible compulsion.

2. The offense of sexual abuse in the first degree is a class C felony unless the victim is less than fourteen years of age, or it is an aggravated sexual offense, in which case it is a class B felony.

566.101. Sexual abuse, second degree, penalties. –

1. A person commits the offense of sexual abuse in the second degree if he or she purposely subjects another person to sexual contact without that person's consent.
2. The offense of sexual abuse in the second degree is a class A misdemeanor, unless it is an aggravated sexual offense, in which case it is a class E felony.

566.020. Mistake as to age--consent not a defense, when. –

1. Whenever in this chapter the criminality of conduct depends upon a child being less than fourteen years of age, it is no defense that the defendant believed the child to be older.
2. Whenever in this chapter the criminality of conduct depends upon a child being less than seventeen years of age, it is an affirmative defense that the defendant reasonably believed that the child was seventeen years of age or older.
3. Consent is not a defense to any offense under this chapter if the alleged victim is less than fourteen years of age.

566.032. Statutory rape and attempt to commit, first degree, penalties. –

1. A person commits the offense of statutory rape in the first degree if he or she has sexual intercourse with another person who is less than fourteen years of age.
2. The offense of statutory rape in the first degree or an attempt to commit statutory rape in the first degree is a felony for which the authorized term of imprisonment is life imprisonment or a term of years not less than five years, unless:
 - (1) The offense is an aggravated sexual offense, or the victim is less than twelve years of age in which case the authorized term of imprisonment is life imprisonment or a term of years not less than ten years; or
 - (2) The person is a persistent or predatory sexual offender as defined in section 566.125 and subjected to an extended term of imprisonment under said section.

566.034. Statutory rape, second degree, penalty. –

1. A person commits the offense of statutory rape in the second degree if being twenty-one years of age or older, he or she has sexual intercourse with another person who is less than seventeen years of age.
2. The offense of statutory rape in the second degree is a class D felony.

568.020. Incest – penalty. –

1. A person commits the offense of incest if he or she marries or purports to marry or engages in sexual intercourse or deviate sexual intercourse with a person he or she knows to be, without regard to legitimacy, his or her:
 - (1) Ancestor or descendant by blood or adoption; or
 - (2) Stepchild, while the marriage creating that relationship exists; or
 - (3) Brother or sister of the whole or half-blood; or
 - (4) Uncle, aunt, nephew or niece of the whole blood.
2. The offense of incest is a class E felony.
3. The court shall not grant probation to a person who has previously been found guilty of an offense under this section.

455.010. Definitions. [Abuse--Adults and Children--Shelters and Protective Orders Adult Abuse]

As used in this chapter, unless the context clearly indicates otherwise, the following terms shall mean:

1. **"Abuse"** includes but is not limited to the occurrence of any of the following acts, attempts or threats against a person who may be protected pursuant to this chapter, except abuse shall not include abuse inflicted on a child by accidental means by an adult household member or discipline of a child, including spanking, in a reasonable manner:
 - a) **"Abusing a pet"**, purposely or knowingly causing, attempting to cause, or threatening to cause physical injury to a pet with the intent to control, punish, intimidate, or distress the petitioner;
 - b) **"Assault"**, purposely or knowingly placing or attempting to place another in fear of physical harm;
 - c) **"Battery"**, purposely or knowingly causing physical harm to another with or without a deadly weapon;
 - d) **"Coercion"**, compelling another by force or threat of force to engage in conduct from which the latter has a right to abstain or to abstain from conduct in which the person has a right to engage;
 - e) **"Harassment"**, engaging in a purposeful or knowing course of conduct involving more than one incident that alarms or causes distress to an adult or child and serves no legitimate purpose. The course of conduct must be such as would cause a reasonable adult or child to suffer substantial emotional distress and must actually cause substantial emotional distress to the petitioner or child. Such conduct might include, but is not limited to:
 - a) Following another about in a public place or places;
 - b) Peering in the window or lingering outside the residence of another; but does not include constitutionally protected activity;
 - f) **"Sexual assault"**, causing or attempting to cause another to engage involuntarily in any sexual act by force, threat of force, duress, or without that person's consent;
 - g) **"Unlawful imprisonment"**, holding, confining, detaining or abducting another person against that person's will;
2. **"Adult"**, any person seventeen years of age or older or otherwise emancipated;
3. **"Child"**, any person under seventeen years of age unless otherwise emancipated;
4. **"Court"**, the circuit or associate circuit judge or a family court commissioner;
5. **"Domestic violence"**, abuse or stalking committed by a family or household member, as such terms are defined in this section;
6. **"Ex parte order of protection"**, an order of protection issued by the court before the respondent has received notice of the petition or an opportunity to be heard on it;
7. **"Family" or "household member"**, spouses, former spouses, any person related by blood or marriage, persons who are presently residing together or have resided together in the past, any person who is or has been in a continuing social relationship of a romantic or intimate nature with the victim, and anyone who has a child in common regardless of whether they have been married or have resided together at any time;
8. **"Full order of protection"**, an order of protection issued after a hearing on the record where the respondent has received notice of the proceedings and has had an opportunity to be heard;
9. **"Order of protection"**, either an ex parte order of protection or a full order of protection;
10. **"Pending"**, exists or for which a hearing date has been set;
11. **"Pet"**, a living creature maintained by a household member for companionship and not for commercial purposes;
12. **"Petitioner"**, a family or household member who has been a victim of domestic violence, or any person who has been the victim of stalking or sexual assault, or a person filing on behalf of a child pursuant to section 455.503 who has filed a verified petition pursuant to the provisions of section 455.020 or section 455.505;
13. **"Respondent"**, the family or household member alleged to have committed an act of domestic violence, or person alleged to have committed an act of stalking or sexual assault, against whom a verified petition has been filed or a person served on behalf of a child pursuant to section 455.503;
14. **"Sexual assault"**, as defined under subdivision (1) of this section;

15. **"Stalking"** is when any person purposely engages in an unwanted course of conduct that causes alarm to another person, or a person who resides together in the same household with the person seeking the order of protection when it is reasonable in that person's situation to have been alarmed by the conduct. As used in this subdivision:
- a) **"Alarm"**, to cause fear of danger of physical harm; and
 - b) **"Course of conduct"**, two or more acts that serve no legitimate purpose including, but not limited to, acts in which the stalker directly, indirectly, or through a third party follows, monitors, observes, surveils, threatens, or communicates to a person by any action, method, or device.

455.020. Relief may be sought — order of protection effective, where. —

1. Any person who has been subject to domestic violence by a present or former family or household member, or who has been the victim of stalking or sexual assault, may seek relief under sections 455.010 to 455.085 by filing a verified petition alleging such domestic violence, stalking, or sexual assault by the respondent.
2. A person's right to relief under sections 455.010 to 455.085 shall not be affected by the person leaving the residence or household to avoid domestic violence.
3. Any protection order issued pursuant to sections 455.010 to 455.085 shall be effective throughout the state in all cities and counties.

565.072 Domestic assault, first degree--penalty.

1. A person commits the offense of domestic assault in the first degree if he or she attempts to kill or knowingly causes or attempts to cause serious physical injury to a domestic victim, as the term "domestic victim" is defined under section 565.002
2. The offense of domestic assault in the first degree is a class B felony unless in the course thereof the person inflicts serious physical injury on the victim, in which case it is a class A felony.

565.73 Domestic assault, second degree--penalty.

1. A person commits the offense of domestic assault in the second degree if the act involves a domestic victim, as the term "domestic victim" is defined under section 565.002, and he or she:
 - (1) Knowingly causes physical injury to such domestic victim by any means, including but not limited to, use of a deadly weapon or dangerous instrument, or by choking or strangulation; or
 - (2) Recklessly causes serious physical injury to such domestic victim; or
 - (3) Recklessly causes physical injury to such domestic victim by means of any deadly weapon.
2. The offense of domestic assault in the second degree is a class D felony.

565.74 Domestic assault, third degree--penalty.

1. A person commits the offense of domestic assault in the third degree if he or she attempts to cause physical injury or knowingly causes physical pain or illness to a domestic victim, as the term "domestic victim" is defined under section 565.002.¹

¹ 565.002(6). Definitions: "Domestic victim", a household or family member as the term "family" or "household member" is defined in section 455.010, including any child who is a member of the household or family;

565.76 Domestic assault in the fourth degree, penalty.

1. A person commits the offense of domestic assault in the fourth degree if the act involves a domestic victim, as the term "domestic victim" is defined under section 565.002, and:
 - (1) The person attempts to cause or recklessly causes physical injury, physical pain, or illness to such domestic victim;
 - (2) With criminal negligence the person causes physical injury to such domestic victim by means of a deadly weapon or dangerous instrument;
 - (3) The person purposely places such domestic victim in apprehension of immediate physical injury by any means;
 - (4) The person recklessly engages in conduct which creates a substantial risk of death or serious physical injury to such domestic victim;
 - (5) The person knowingly causes physical contact with such domestic victim knowing he or she will regard the contact as offensive; or
 - (6) The person knowingly attempts to cause or causes the isolation of such domestic victim by unreasonably and substantially restricting or limiting his or her access to other persons, telecommunication devices or transportation for the purpose of isolation.
2. The offense of domestic assault in the fourth degree is a class A misdemeanor, unless the person has previously been found guilty of the offense of domestic assault, of any assault offense under this chapter, or of any offense against a domestic victim committed in violation of any county or municipal ordinance in any state, any state law, any federal law, or any military law which if committed in this state two or more times would be a violation of this section, in which case it is a class E felony. The offenses described in this subsection may be against the same domestic victim or against different domestic victims.

565.225. Stalking, first degree, penalty.

1. As used in this section and section 565.227, the term "**disturbs**" shall mean to engage in a course of conduct directed at a specific person that serves no legitimate purpose and that would cause a reasonable person under the circumstances to be frightened, intimidated, or emotionally distressed.
2. A person commits the offense of stalking in the first degree if he or she purposely, through his or her course of conduct, disturbs or follows with the intent of disturbing another person and:
 - (1) Makes a threat communicated with the intent to cause the person who is the target of the threat to reasonably fear for his or her safety, the safety of his or her family or household member, or the safety of domestic animals or livestock as defined in section 276.606 kept at such person's residence or on such person's property. The threat shall be against the life of, or a threat to cause physical injury to, or the kidnapping of the person, the person's family or household members, or the person's domestic animals or livestock as defined in section 276.606 kept at such person's residence or on such person's property; or
 - (2) At least one of the acts constituting the course of conduct is in violation of an order of protection and the person has received actual notice of such order; or
 - (3) At least one of the actions constituting the course of conduct is in violation of a condition of probation, parole, pretrial release, or release on bond pending appeal; or
 - (4) At any time during the course of conduct, the other person is seventeen years of age or younger and the person disturbing the other person is twenty-one years of age or older; or
 - (5) He or she has previously been found guilty of domestic assault, violation of an order of protection, or any other crime where the other person was the victim; or
 - (6) At any time during the course of conduct, the other person is a participant of the address confidentiality program under sections 589.660 to 589.681, and the person disturbing the other person knowingly accesses or attempts to access the address of the other person.
3. Any law enforcement officer may arrest, without a warrant, any person he or she has probable cause to believe has violated the provisions of this section.
4. This section shall not apply to activities of federal, state, county, or municipal law enforcement officers conducting investigations of any violation of federal, state, county, or municipal law.

5. The offense of stalking in the first degree is a class E felony, unless the defendant has previously been found guilty of a violation of this section or section 565.227, or any offense committed in another jurisdiction which, if committed in this state, would be chargeable or indictable as a violation of any offense listed in this section or section 565.227, or unless the victim is intentionally targeted as a law enforcement officer, as defined in section 556.061, or the victim is targeted because he or she is a relative within the second degree of consanguinity or affinity to a law enforcement officer, in which case stalking in the first degree is a class D felony.

565.227. Stalking, second degree, penalty.

1. A person commits the offense of stalking in the second degree if he or she purposely, through his or her course of conduct, disturbs, or follows with the intent to disturb another person.
2. This section shall not apply to activities of federal, state, county, or municipal law enforcement officers conducting investigations of any violation of federal, state, county, or municipal law.
3. Any law enforcement officer may arrest, without a warrant, any person he or she has probable cause to believe has violated the provisions of this section.
4. The offense of stalking in the second degree is a class A misdemeanor, unless the defendant has previously been found guilty of a violation of this section or section 565.225, or of any offense committed in another jurisdiction which, if committed in this state, would be chargeable or indictable as a violation of any offense listed in this section or section 565.225, or unless the victim is intentionally targeted as a law enforcement officer, as defined in section 556.061, or the victim is targeted because he or she is a relative within the second degree of consanguinity or affinity to a law enforcement officer, in which case stalking in the second degree is a class E felony.

****Note that Missouri does not define the term Dating Violence**

578.365. Hazing — consent not a defense — penalties.

1. A person commits the offense of hazing if he or she knowingly participates in or causes a willful act, occurring on or off the campus of a public or private college or university, directed against a student or a prospective member of an organization operating under the sanction of a public or private college or university, that recklessly endangers the mental or physical health or safety of a student or prospective member for the purpose of initiation or admission into or continued membership in any such organization to the extent that such person is knowingly placed at probable risk of the loss of life or probable bodily or psychological harm. Acts of hazing include:
 - (1) Any activity which recklessly endangers the physical health or safety of the student or prospective member, including but not limited to physical brutality, whipping, beating, branding, exposure to the elements, forced consumption of any food, liquor, drug or other substance, or forced smoking or chewing of tobacco products;
 - (2) Any activity which recklessly endangers the mental health of the student or prospective member, including but not limited to sleep deprivation, physical confinement, or other extreme stress-inducing activity; or
 - (3) Any activity that requires the student or prospective member to perform a duty or task which involves a violation of the criminal laws of this state or any political subdivision in this state.
2. Public or private colleges or universities in this state shall adopt a written policy prohibiting hazing by any organization operating under the sanction of the institution.
3. Nothing in this section shall be interpreted as creating a new private cause of action against any educational institution.
4. Consent is not a defense to hazing. Section 565.010 does not apply to hazing cases or to homicide cases arising out of hazing activity.
5. The offense of hazing is a class A misdemeanor, unless the act creates a substantial risk to the life of the student or prospective member, in which case it is a class D felony.

APPENDIX F – 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, “we are finding their friends and they will take them 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.”

Please contact the University’s Title IX Coordinator or the Sexual Offense Advocate with any questions about the material provided in this Appendix or about bystander intervention generally.

APPENDIX E – FIRE SAFETY TIPS

If your clothes are on fire, stop, drop, and roll to extinguish fire. If you are trapped in a room:

- Place cloth material around the bottom of the door to prevent smoke from entering.
- Close as many doors as possible between you and the fire.
- Do not break glass unless necessary. Outside smoke may enter.
- Signal from a window if possible.

If you are caught in smoke:

- Drop to your hands and knees, and crawl.
- Hold your breath as long as possible.
- Breathe shallowly through your nose and use clothing as a filter.

If you are forced to advance through flames:

- Hold your breath.
- Move quickly.
- Cover your head and hair.
- Lower your head and close your eyes often.

APPENDIX F – RISK REDUCTION TIPS

- Be aware of your surroundings. Knowing where you are and who is around you may help you to find a way to get out of a bad situation.
- Try to avoid isolated areas. It is more difficult to get help if no one is around.
- Walk with purpose. Even if you don't know where you are going, act like you do.
- Trust your instincts. If a situation or location feels unsafe or uncomfortable, it probably isn't the best place to be.
- Try not to load yourself down with packages or bags as this can make you appear more vulnerable.
- Make sure your cell phone is with you and charged and that you have cab money
- Don't allow yourself to be isolated with someone you don't trust or someone you don't know.
- Avoid putting music headphones in both ears so that you can be more aware of your surroundings, especially if you are walking alone.
- When you go to a social gathering, go with a group of friends. Arrive together, check in with each other throughout the evening, and leave together. Knowing where you are and who is around you may help you to find a way out of a bad situation.
- Trust your instincts. If you feel unsafe in any situation, go with your gut. If you see something suspicious, contact law enforcement immediately (local authorities can be reached by calling 911 in most areas of the U.S.).
- Don't leave your drink unattended while talking, dancing, using the restroom, or making a phone call. If you've left your drink alone, get a new one.
- Don't accept drinks from people you don't know or trust. If you choose to accept a drink, go with the person to the bar to order it, watch it being poured, and carry it yourself. At parties, don't drink from the punch bowls or other large, common open containers.
- Watch out for your friends, and vice versa. If a friend seems out of it, is way too intoxicated for the amount of alcohol they've had, or is acting out of character, get him or her to a safe place immediately.
- If you suspect you or a friend has been drugged, contact law enforcement immediately by calling 911

