2022 Annual Security and Fire Safety Report

(Information for 2022-2023 Academic Year)

Statistics for Calendar Years 2019, 2020, 2021

Main Campus
Conard Environmental Research Area
Grinnell-in-London
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Introduction

Grinnell College was founded in 1846 and is located in Grinnell, Iowa. It is a private, coeducational, residential liberal arts and sciences institution. The College confers Bachelor of Arts degrees in 27 majors and offers individualized curriculum planning and advising. Independent majors are also possible.

Grinnell College currently has three separate campuses, as defined by U.S Department of Education Office of Postsecondary Education, as it pertains to the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act. The main campus is located in Grinnell, Iowa. The branch campuses are the Conard Environmental Research Center (CERA), located in Kellogg, Iowa, and the Grinnell-in-London Campus, located in London, England. All policy statements contained in this report apply to all current campuses unless otherwise indicated.

Grinnell College owns the Conard Environmental Research Center (CERA), a 365-acre field station situated 11 miles outside of Grinnell. It is located at 11203 S. 12th Ave E. in Kellogg, Iowa, which is in Jasper County. This location has an on-site manager.

The Grinnell-in-London Campus is located at 60 South Molton Street, London W1K 5SW, United Kingdom. Grinnell-in-London leases space from IFSA Butler. This location has an on-site resident director.

Preparation of the Annual Disclosure of Crime and Residential Facility Fire Statistics

In compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act and the Violence Against Women Reauthorization Act of 2013 (VAWA), Grinnell College publishes an Annual Security Report (ASR) and an Annual Fire Safety Report (AFSR) for its campuses by October 1.

The purposes of this publication are to:

- provide the college community with an overview of Grinnell College’s services,
- share crime statistics required by the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act and the Violence Against Women Reauthorization Act of 2013 (VAWA),
- inform current and prospective students, staff, faculty and visitors about the College’s policies and programs designed to help keep them safe,
- share information regarding emergency preparedness and planning, and
- share information regarding fire safety, fire statistics and fire-related information.

This report is prepared by the Department of Campus Safety in cooperation with local law enforcement agencies surrounding our campuses and other College offices involved in the development and/or implementation of the policies included within the report. It contains Clery Act crime statistics for the past three calendar years for all of its campuses, as well as several policy statements and procedures concerning the safety and well-being of our campus communities. The Annual Fire Safety Report is only required for the main campus location. It
contains statistics for fires in residential facilities for the past three calendar years and policies related to fire safety on the main campus. All policy statements contained in this report apply to all current campuses unless otherwise indicated.

Each year members of the Grinnell College community will receive an e-mail notification by October 1st of the availability of the Annual Security Report and Fire Safety Report (ASFSR). The Annual Security Report and Fire Safety Report (ASFSR) are located on the Campus Safety web site or http://www.grinnell.edu/annual-security-report. Individuals can obtain a printed copy of this report by contacting the Grinnell College Department of Campus Safety, 1213 6th Avenue, Grinnell, Iowa, 50112 or (641) 269-4600.

The College’s crime statistics are also submitted to the United States Department of Education’s website through the annual Campus Safety and Security Survey annually in October. This is done in compliance with the Higher Education Act of 1965 (HEA, section 485), as amended, as a condition of the institution’s continued participation in the Federal student financial assistance programs. Crime statistics are available to the public on the U.S. Department of Education Campus Safety and Security website. At this site, on the left hand side, click “Get Data for One School” and search using “Grinnell College”.

**Law Enforcement/Security Authority**

**Law Enforcement – Main Campus**

The Department of Campus Safety for Grinnell College operates 24-hours a day throughout the year. All requests for immediate assistance relating to issues of safety and security on campus should be made by calling (641) 269-4600 or by visiting the Department of Campus Safety at 1213 6th Avenue, Grinnell, Iowa, 50112. Campus Safety Officers respond to all requests for service and assistance.

The Grinnell College Department of Campus Safety Officers have jurisdiction to operate on Grinnell College owned or controlled property. They also patrol the public property areas (streets and sidewalks) bordering or connecting areas of campus.

Campus Safety Officers are employees of Grinnell College; they are not certified or sworn peace officers. Campus Safety is not a police department and personnel do not possess law enforcement (arrest) authority. However, personnel may utilize private person arrest authority pursuant to Iowa State Statute 804.9 when appropriate. Officers do have the authority to enforce College Policies, Procedures and Rules.

Campus Safety works closely with local, state, and federal law enforcement agencies to respond to and track criminal activity on campus. Grinnell College is located in the jurisdiction of the Grinnell Police Department which is the primary law enforcement agency. Grinnell Police Officers are commissioned by the State of Iowa to enforce local, state, and federal laws and to make arrests. In addition to the Grinnell Police Department, Campus Safety works with the Poweshiek County Sheriff’s Office and State and Federal law enforcement agencies to respond to criminal activity. Campus Safety Officers address, alone or in conjunction with local law enforcement personnel, violators of state law, federal law, and College policy. Violators of state or federal laws are reported to local law enforcement authorities, while violations of College policies are administered under the Grinnell College Code of Conduct or in conformance with the faculty handbook or staff handbook respectively.
The Department of Campus Safety maintains a positive working relationship with the Grinnell Police Department, Poweshiek County Sheriff’s Office, and the Grinnell Fire Department. The Director of Campus Safety has periodic meetings with these agencies to discuss safety and security issues that may involve or impact the campus community. Grinnell College does not have a Memorandum of Understanding (MOU) with the Grinnell Police Department, Poweshiek County Sheriff’s Office, or the Iowa State Patrol regarding the investigation of alleged criminal incidents.

Grinnell College does not have any officially recognized student organizations at non-campus locations; this also includes student organization with non-campus housing facilities, which would require the monitoring and recording of criminal activity.

Law Enforcement – Conard Environmental Research Area (CERA)
The CERA campus is under the law enforcement jurisdiction of the Jasper County Sheriff’s Office. During the school year, the Jasper County Sheriff’s Office deputies conduct periodic patrols of the campus area. The deputies are commissioned by the State of Iowa to enforce local, state, and federal laws and to make arrests.

The Department of Campus Safety maintains a positive working relationship with the Jasper County Sheriff’s Office. The College does not have a MOU with the Jasper County Sheriff’s Office regarding the investigation of alleged criminal incidents. The College does not have any officially recognized student organizations with non-campus locations, which would require the monitoring and recording of criminal activity by the local law enforcement agency.

Law Enforcement – Grinnell-in-London (GIL)
The Grinnell-in-London Campus is under the law enforcement jurisdiction of the London Metropolitan Police. The police are responsible for enforcing laws and making arrests. Grinnell College does not have a MOU with this agency regarding the investigation of alleged criminal incidents.

The College does not have any officially recognized student organizations with non-campus locations, which would require the monitoring and recording of criminal activity by the local law enforcement agency.

**Daily Crime and Fire Log**

**Daily Crime and Fire Log – Main Campus**
The Department of Campus Safety maintains a combined Daily Crime and Fire Log for its Main Campus location. Crime log entries include all criminal incidents, alleged criminal incidents, and fires that occur in an on-campus housing facility. The reporting of criminal incidents encompass all criminal activity on-campus, not just Clery reportable crimes. These aforementioned reportable categories reflect criminal activity or fires that have occurred within Grinnell College’s campus geography.

The log contains specific information about reported criminal incidents, including the date the crime was reported, the date and time the crime occurred, offense description, the general location of the crime, and the disposition of the complaint, if known. Crimes are recorded in the crime log by the date when they are reported to the Department of Campus of Safety, regardless of how much time has passed since the alleged incident occurred.
The log is available for review by the public Monday through Friday 8am-5pm excluding holidays and other campus closures. The main campus Daily Crime and Fire Log is available on-site in paper form at the Campus Safety building located at 1213 6th Avenue, Grinnell, Iowa.

Daily Crime and Fire Log – Conard Environmental Research Area (CERA)
The Department of Campus Safety does not have a safety officer assigned to its Conard Environmental Research Area (CERA) campus, as defined by the Clery Act. A Daily Crime and Fire log is not required for this campus.

The Department of Campus Safety does not have a security department on its Grinnell-in-London (GIL) campus, as defined by the Clery Act. A Daily Crime and Fire Log is not required for this campus.

DEFINITIONS

Crime Definitions
Under the Clery Act, for the purposes of counting and disclosing Criminal Offenses, Hate Crime, arrest and disciplinary referral statistics are based on definitions provided by the Federal Bureau of Investigations’ (FBI’s) Uniform Crime Reporting (UCR) Program. The definitions for Murder, Rape, Robbery, Aggravated Assault, Burglary, Motor Vehicle Theft, Arson, Weapons Carrying, Possessing, Law Violations, Drug Abuse Violations, and Liquor Law Violations are from the Summary Reporting System (SRS) User Manual from the FBI’s UCR Program. The definitions of Fondling, Incest and Statutory Rape are from the FBI’s National Incident-Based Reporting System (NIBRS) Data Collection Guidelines edition of the UCR.

Hate Crimes are classified according to the FBI’s Uniform Crime Reporting Hate Crime Data Collection Guidelines and Training Manual. Note that, although the law states that institutions must use the UCR Program definitions, Clery Act crime-reporting does not have to meet all of the UCR Program standards.

The categories of Domestic Violence, Dating Violence and Stalking are defined using the language provided by the Violence Against Women Act of 1994 and repeated in the Clery Act regulations.

These definitions are outlined below and are followed by other relevant definitions used in this report.

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.

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

Fondling - The touching of the private body 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 where in 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 at taking anything of value from 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. (It is not necessary that injury result from aggravated assault when a gun, knife, or other weapon is used that could possibly result in serious personal injury if the crime were successfully completed).

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 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 persons not having lawful access even though the vehicles are later abandoned, including guarding).

Arson - Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft or personal property of another.

Arrest - A person processed by arrest, citation or summons.

Referral for Disciplinary Action - The referral of any person to any official who initiates a disciplinary action of which a record is kept and which may result in the imposition of a sanction.

Liquor Law Violations - The violation of any laws or ordinances prohibiting: the manufacture, sale, transporting, furnishing, possessing of intoxicating liquor; maintaining unlawful drinking places; bootlegging, operating a still; furnishing liquor to a minor or intemperate person; using a vehicle for illegal transportation of liquor; drinking on a train or public conveyance; and all attempts to commit any of the aforementioned. (Drunkenness and driving under the influence are not included in the definition).

Drug Abuse Violations - Violations of state and local laws relating to the unlawful possession, sale, use, growing, manufacturing, and making of narcotic drugs. The relevant substances include opium or cocaine and their derivatives (morphine, heroin, codeine); marijuana; synthetic narcotics (Demerol, methadone); and dangerous non-narcotic drugs (barbiturates, Benzedrine).

Weapons Law Violations - The violation of laws or ordinances dealing with weapons offenses, regulatory in nature, such as manufacture, sale, or possession of deadly weapons; carrying deadly weapons, concealed or openly; furnishing deadly weapons to minors; aliens possessing deadly weapons; and all attempts to commit any of the aforementioned.
Hate Crimes – A Hate Crimes is a criminal offense committed against a person or property which is motivated, in whole or in part, by the offender's bias against a race, religion, disability, sexual orientation, ethnicity, national origin, or gender identity.

- **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.

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

- **Gender Identity** – A preformed negative opinion or attitude towards 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.

Hate Crimes include the primary crimes, noted in the previous section (except negligent manslaughter), in addition to the offenses of Larceny-Theft, Simple Assault, Intimidation, and Destruction/Damage/Vandalism of Property are included if they are Hate Crimes.

**Larceny-Theft** - The unlawful taking, carrying, leading or riding away of property from the possession or constructive possession of another. 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 the offender neither displays a weapon nor the victim suffers obvious severe or aggravated bodily injury, such as apparent broken bones, loss of teeth, possible internal injury, severe laceration or loss of consciousness.

**Intimidation** - Unlawfully placing 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** - Willfully or maliciously destroying, damaging, defacing, or otherwise injuring real or personal property without the consent of the owner or the person having custody or control of it.
**Domestic Violence** - A felony or misdemeanor crime of violence committed by a current or former spouse or intimate partner of the victim, a person with whom the victim shares a child in common; a person who is cohabitating with or has cohabited with the victim as a spouse or intimate partner; a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies [under VAWA], or 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.

**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; and where the existence of such a relationship shall be determined based on a consideration of the following factors: the length of the relationship; the type of relationship; and the frequency of interaction between the persons involved in the relationship.

**Stalking** - Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for his or her safety or the safety of others; or suffer substantial emotional distress.

**Unfounded Crime** - A reported crime that upon investigation by law enforcement authorities is found to be false or baseless. Only sworn or commissioned law enforcement personnel may unfound a crime. Crime reports can be properly determined to be false only if the evidence from a complete and thorough investigation establishes that the crime reported was not, in fact, completed or attempted in any manner.

**Hierarchy Rule** – When more than one criminal offense was committed during a single incident you should only count the most serious offense. Institutions must use the FBI’s UCR Hierarchy Rule. There are exceptions to using the Hierarchy Rule when counting Arson, Sexual Assaults and Hate Crimes.

**Campus Location Reporting Definitions**

**Separate Campus** - A location/site the institution owns or controls; is not reasonably geographically contiguous with the main campus; has an organized program of study; and has at least one person on site acting in an administrative capacity.

**On-Campus** - Any building or property owned or controlled by an institution of higher education 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; and any building or property within or reasonably contiguous to the area of the institution 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** – 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.

- It is important to note that the category of On-Campus Student Housing is a sub-set of the On-Campus Category and crimes occurring in On-Campus Student Housing will be included in both the On-Campus category, as well as the On-Campus Student Housing category.
**Noncampus building or property** - Any building or property owned by or controlled by a student organization recognized by the institution; and any building or property (other than a branch campus) owned or controlled by an institution of higher education 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.

**Public property** - All public property (refers to property owned by a public entity), including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus.

**Crime Statistics**

Crimes statistics follow for the main campus in Grinnell Iowa, Conard Environmental Research Area (CERA), and Grinnell-in-London. Statistics are reported separately for each location.

The following statistics have been compiled from incidents reported to the Grinnell College Department of Campus Safety, local law enforcement agencies within the campuses’ jurisdictions, and campus security authorities during the 2019, 2020, and 2021 calendar years for crimes that occurred on or within the Grinnell College Clery Geography. The statistics do not reflect any reports that might have been made to other departments or individuals at the College unless those individuals or departments informed Campus Safety of the incident.

Statistics are based on reports of alleged criminal incidents. It is not necessary for the crime to have been investigated by the police, nor must a finding of guilt or responsibility be made to determine inclusion in the annual crime statistics.

**Crime Statistics – Main Campus**

<table>
<thead>
<tr>
<th>Criminal Offenses (Reported by Hierarchy)</th>
<th>Year</th>
<th>On-Campus Property</th>
<th>Noncampus Property</th>
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2020: No hate crimes reported.
2019: No hate crimes reported.

**Unfounded Crimes**
2021: No unfounded crimes
2020: No unfounded crimes.
2019: No unfounded crimes.
### Crime Statistics – Conard Environmental Research Area (CERA)

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#### Arrests & Disciplinary Referrals

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<th>On-Campus Student Housing</th>
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### Arrests & Disciplinary Referrals

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<th>Year</th>
<th>On-Campus Property</th>
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<th>On-Campus Student Housing</th>
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**DISCIPLINARY REFERRALS:** Weapons Law Violations

#### Violence Against Women Act (VAWA) Offenses

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<tr>
<th>Year</th>
<th>On-Campus Property</th>
<th>Noncampus Property</th>
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Grinnell In London does not have any properties eligible to be classified as On-Campus Student Housing. Grinnell College currently has a third-party contract outside of the main campus geography where students reside. Due to the property being outside the main campus geography and the use of a third-party housing contract, the property is classified as Noncampus.

Furthermore, Grinnell College did not participate in any programs at the Grinnell In London site in 2021.

### Hate Crimes Reported

- **2021:** No hate crimes reported.
- **2020:** No hate crimes reported.
- **2019:** No hate crimes reported.

### Unfounded Crimes

- **2021:** No unfounded cases.
- **2020:** No unfounded cases.
- **2019:** No unfounded cases.

### Crime Reporting

All faculty, staff, students and all visitors who become aware of alleged criminal activity, suspicious behavior, and any emergencies on-campus, on public property running through or immediately adjacent to the campus, or in other property that is owned or controlled by Grinnell College shall report this information accurately and promptly to the Campus Safety Department by calling (641) 269-4600 and/or local law enforcement.
Accurate and prompt crime reporting is necessary for Campus Safety to assess potential threats and issue Timely Warning notices to the campus community, as well as insure that the information is included in the annual disclosure of crime statistics.

It is imperative that crimes or other emergencies be reported promptly and accurately, when the victim of a crime elects to or is unable to make a report, so that College officials may respond accordingly.

Crime Reporting – Main Campus

Campus Safety Officers can take reports at the Campus Safety Office located at 1213 6th Avenue or by phone at (641) 269-4600. In addition, Campus Safety Officers can be dispatched to your location if you are on campus. While criminal activity and emergencies may be reported directly to local law enforcement by dialing 911 (emergency) or (641) 236-2670, all members of the community are helpful when they immediately report crimes or emergencies the Department of Campus Safety and other primary Campus Security Authorities listed below for the purpose of making timely warning reports and for inclusion in the annual statistical disclosure.

In addition, you may report a crime to the following positions (below are some of the key Campus Security Authorities; however, not intended to be an all-inclusive listing):

- **Vice President of Student Affairs**
  Joe Rosenfield ’25 Center
  (641) 269-3700

- **Dean of Students**
  Joe Rosenfield ’25 Center
  (641) 269-3714

- **Assistant Vice President of Human Resources**
  Mears Cottage
  (641) 269-4974

- **Chief Diversity Officer**
  Nollen House
  (641) 269-9801

- **Title IX Coordinator**
  Mears Cottage
  (641) 269-4999

**Response to a Report**

Dispatchers are available at these respective telephone numbers 24 hours a day to answer your calls. In response to a call, the Department of Campus Safety will take the required action, either dispatching an officer or asking the victim to report to the Campus Safety Office to file an incident report. All reported crimes will be investigated by the College and may become a matter of public record. If assistance is required from the Grinnell Police Department or the Grinnell Fire Department, the Department of Campus Safety will contact the appropriate unit. If a sexual assault or rape should occur, staff on the scene, including the Department of Campus Safety, will offer the victim a wide variety of services.
Upon receiving a report of criminal activity, the Department of Campus Safety will consider timely warning notification and document the incident in a case report. Case reports will be forwarded to the appropriate College officials for determination of violations or disciplinary considerations, and may be shared with appropriate law enforcement agencies. Reports of criminal activity received by the Department of Campus Safety will be posted in our daily crime and fire log, available at the Campus Safety Office at 1213 6th Avenue in Grinnell, Iowa.

All allegations will be investigated. These investigations may be made in conjunction with the Grinnell Police Department or other law enforcement agencies. When alleged perpetrators are identified as students, the case will be shared with the Associate Vice President of Student Affairs, or designee, for investigation and appropriate action. When alleged perpetrators are identified as employees, the case will be shared with the Assistant Vice President of Human Resources, or designee, for investigation and appropriate action. Criminal investigation, arrest, and prosecution can occur independently, before, during or after the student or employee conduct processes.

Crime Reporting – Conard Environmental Research Area (CERA)
To report a crime or other emergency at CERA, dial 9-1-1 (emergency) or the Jasper County Sheriff’s Office by dialing (641) 792-5912. Students, faculty, staff and visitors are encouraged to accurately and promptly report crimes to the Sheriff’s Office and Campus Safety for purposes of including them in the annual statistical disclosure and assessing them for issuing a Timely Warning Notices, when deemed necessary. The College contacts the Jasper County Sheriff’s Office on a yearly basis to collect crime statistics for the CERA campus.

Other Reporting Locations - CERA
In addition to the “Other Reporting Locations” listed above for the Main Campus, you may also report a crime to the following persons (below are some of the key Campus Security Authorities; however, not intended to be an all-inclusive listing):

- CERA Manager and Center for Prairie Studies Outreach Coordinator
  (641) 260-6942
- CERA Director
  (641) 269-4354
- Director for Prairie Studies
  (641) 269-3139

Crime Reporting - Grinnell-in-London (GIL)
To report a crime or other emergency in Grinnell-in-London, contact the Metropolitan Police Department, fire brigade, or ambulance immediately by locally dialing 9-9-9, which is the general emergency number. Any suspicious activity or person should also be reported to the London Metropolitan Police Department, to the Florida State University (FSU) Building Management Staff and to the Resident Director, Donna Vinter, for the purpose of making Timely Warning reports and inclusion in the annual crime statistics disclosure report. To report a crime that has already happened, seek crime prevention advice or make police aware of any policing issues in your local area, call 101 or contact the Bloomsbury Safer Neighborhoods Team at 020 8721 2693. (Calls to 101 from landlines and mobiles cost 15 cents, no matter what time of day you call or how long your call lasts.). You can also text the British Transport Police at 61016 to
report non-emergency incidents, similar to the ones you would report to the 101 phone number provided by the local police force. If you have witnessed a crime on the Underground or buses, you can speak in confidence to the British Transport Police on 0800 405040.

Students, faculty, staff and visitors are encouraged to accurately and promptly report crimes to the police department and/or persons listed below for purposes of including them in the annual statistical disclosure and assessing them for issuing a Timely Warning Notices, when deemed necessary. The College contacts the police on a yearly basis to collect crime statistics for the GIL site.

**Other Reporting Locations - GIL**

In addition to the “Other Reporting Locations” listed above for the Main Campus, you may also report a crime to the following persons (below is some of the key Campus Security Authorities; however, not intended to be an all-inclusive listing):

- Terence Coetzee, Director IFSA-Butler  
  Office Telephone: +44 020 7792 8751  
  Email: tcoetzee@ifsa-butler.org
- Susan Duke, Director of Grinnell-in-London  
  Office Telephone: 641-269-4738  
  Email: dukesus@grinnell.edu  
  Office Address: 1226 Park Street, Grinnell, Iowa 50112
- Alicia Stanley, Director of Off-Campus Study  
  Office Telephone: +001 (641) 269-4850  
  Email: stanleya@grinnell.edu  
  Office Address: Grinnell College, 1226 Park Street, Grinnell, Iowa 50112

**Voluntary Confidential Crime Reporting**

If you are the victim of a crime and do not want to pursue action within the College system or the criminal justice system, you may still want to consider making a report on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics. Confidentiality means that information shared by an individual with designated campus or community professionals cannot be revealed to any other person without the express permission of the individual, or as otherwise permitted or required by law. With your permission, a Campus Safety officer can file a report on the details of the incident without revealing your identity (except to the Title IX Coordinator in the event of a reported sex offense or sexual harassment). The purpose of a confidential report is to comply with your wish to keep the matter confidential, while taking steps to enhance the future safety of yourself and others. With such information, the Department of Campus Safety can keep an accurate record of the number of incidents involving students, employees and visitors; determine where there is a pattern of crime with regard to a particular location, method, or assailant; and alert the campus community to potential danger. Reports filed in this manner are counted and disclosed in the annual crime statistics for the institution.

Community members wishing to seek confidential assistance may do so by speaking with professionals who have statutorily protected or designated confidentiality. For students, these professionals include the counseling and medical staff at Student Health and Wellness (SHAW), the Chaplain and Associate Chaplain, Ombuds, and Grinnell Advocates. These individuals are
prohibited from breaking confidentiality unless (i) given permission to do so by the person who disclosed the information; (ii) there is an imminent threat of harm to self or others; (iii) the conduct involves suspected abuse of a minor under the age of 18; or (iv) as otherwise required or permitted by law or court order.

Professional and pastoral counselors will not share any information with other College staff unless they fear that the reporting party is a danger to themselves or to others. Counselors are not required to report crimes for inclusion into the annual disclosure of crime statistics. Counselors are encouraged, if and when they deem it appropriate, to inform individuals being counseled of the procedures to follow in reporting crimes on a voluntary, confidential basis for inclusion into the annual disclosure of crime statistics. These staff can provide information about formalized reporting options, should the individual(s) choose to move forward with that process.

The Grinnell College confidential resources are:

- **Student Health and Wellness (SHAW)**  
The Forum (lower level)  
(641) 269-3230  
Open Monday-Friday; 8AM-5PM  
Call to make an appointment with nurses, therapists and physicians.

- **College Chaplains**  
Center for Religion, Spirituality, and Social Justice (CRSSJ)  
(641) 269-4981  
Office hours: Monday-Friday; 8AM-5PM  
Call to make an appointment with a spiritual advisor, such as the Chaplain or Rabbi. Available 24 hours by contacting Campus Safety at (x4600)

- **Grinnell Advocates**  
Center for Religion, Spirituality, and Social Justice (CRSSJ)  
(641) 260-1615 hotline number  
Available 24 hours by hotline number or by contacting Campus Safety (x4600) and asking for a Grinnell Advocate to contact you at your preferred phone number.  
*Individuals are not required to disclose a name or any identifying information to Campus Safety in order to speak with an advocate.

- **Ombudsperson**  
Joe Rosenfield 25 Center  
(641) 269-9399  
Office hours: Monday-Friday; 8AM-5PM  
Visitors are encouraged to schedule an appointment by phone or drop in during normally scheduled hours. Visitors may also request a meeting with the Ombuds offsite and outside of regular business hours, if necessary.

**Anonymous Reporting**

Any individual may make an anonymous report concerning prohibited conduct, or may report the incident without disclosing their name, identifying the respondent, or requesting any action. Reports filed in this manner will be counted and disclosed in the annual crimes statistics for the institution as long as the pertinent information is provided. Depending on the level of information available about the incident or the individuals involved, anonymous reporting may impact the College’s ability to respond or pursue appropriate action.
EthicsPoint is a service that allows anyone to report suspected misconduct or other issues with complete anonymity or confidentiality. This service allows the person making the report and College administrators to confer about additional details, while the reporting party’s identity remains anonymous and unknown to the college.

Anonymous reports may be made to EthicsPoint:

- By telephone at 855-667-1753, or
- Online at EthicsPoint.

A person who submits a report on EthicsPoint can choose to either enter the e-mail or obtain a Report Key that helps them log back into the system for updates on their report. This allows the College to respond to the anonymous reporter and offer resources and options while the reporter remains anonymous.

EthicsPoint utilizes its own secure servers, outside of the College network, as well as their own call center. While the reports will be forwarded to College administrators for appropriate review and action, the source of all reports submitted to EthicsPoints will remain confidential and will not be shared with College administrators without permission.

All reports of prohibited conduct, as defined in the Grinnell College Policy, Procedures, and Guide to Preventing, Reporting, and Responding to Sexual Misconduct and Other Forms of Interpersonal Violence, will go to the Title IX Coordinator for review.

Emergency Response & Evacuation Procedures

Main Campus and Conard Environmental Research Area (CERA)

The Grinnell College Emergency Procedures website addresses the College’s response to emergencies and evacuations. Individuals, offices, and departments should familiarize themselves with the information in these procedures. While these procedures do not cover every conceivable contingency solution, it does provide the basic administrative guidelines necessary to cope with most campus emergencies.

Individuals can report emergencies occurring at Grinnell College by calling Campus Safety at 641-269-4600 or by contacting Grinnell Police via 911. Additionally, emergencies occurring at the Conard Environmental Research Area (CERA) can be reported by contacting Campus Safety or the Jasper County Sheriffs Office via 911.

Grinnell College will immediately notify the campus community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus. The College will use its emergency notification system, known as Informacast, which provides text and email messages to all members of the Grinnell College community. If any these systems fail or the College deems it appropriate, may use face-to-face communication.

Grinnell College students, faculty and staff are automatically enrolled in the campus emergency notification system, Pioneer Alert, with the information the College has on record. The students, faculty, and staff can update their contact information or opt out of the system, although that is discouraged. Updates to Pioneer Alert accounts can be completed through the Pioneer Alert portal located on the Campus Safety page on GrinnellShare.
The Pioneer Alert System is activated upon confirmation of an imminent threat to the health and safety of the Grinnell Community. The Department of Campus Safety is responsible for responding to reported emergencies and confirming the existence of an emergency, sometimes in conjunction with College administrators, local first responders, Public Health Officials and/or the National Weather Service. Triggers of activation and notification procedures are outlined in the Emergency Operations Plan.

In conjunction with other emergency agencies, the College conducts emergency operations drills and exercises, which consists of tabletop exercises, field exercises and tests of the emergency notification systems. Emergency plans are practiced and reviewed annually. These tests, which may be announced or unannounced, are designed to assess and evaluate the emergency plans and capabilities of the institution.

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

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

The decision to initiate the systems is made by the Director of Campus Safety, Associate Director of Emergency Management, and Associate Vice President of Student Affairs. They are responsible for developing the content of emergency alert notifications and for issuing them through the Pioneer Alert System, and the Vice President of Communications serves as backup.

An alert will be issued without delay, and taking into account the safety of the community, determine the content of the notifications 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. The Director of Campus Safety, Associate Vice President of Student Affairs, and the Associate Director of Emergency Management work together to determine the appropriate segment(s) of the community to receive the emergency alert. In an emergency, Pioneer Alert messages will inform the community of the incident and may include recommended actions, and follow-up Pioneer Alert messages will be sent frequently as more information becomes available.

Follow-up information will be provided to the Grinnell Community using some or all of the systems described above. The larger community, parents, neighbors, and other interested parties can access emergency information through the College website or the media.

The local news media may be utilized to disseminate emergency information to members of the larger community, including neighbors, parents and other interested parties. The larger community can also access emergency information via the Grinnell College’s homepage and/or social media.

If there is an immediate threat to the health or safety of students or employees occurring on campus, an institution must follow its emergency notification procedures. An institution that follows its emergency notification procedures is not required to issue a timely warning based on the same circumstances; however, the institution must provide adequate follow-up information to the community as needed.
Emergency Evacuation Procedures
The emergency evacuation procedures are tested at least twice each year. Students and employees learn the locations of the emergency exits in the buildings and are provided guidance about the direction they should travel when exiting each facility for a short-term building evacuation. The Department of Campus Safety does not tell building occupants in advance about the designated locations for long-term evacuations because those decisions are affected by time of day, location of the building being evacuated, the availability of the various designated emergency gathering locations on campus, and other factors such as the location and nature of the threat. In both cases, Campus Safety staff on the scene will communicate information to students regarding the developing situation or any evacuation status changes.

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

General Evacuation Procedures
At the sound of a fire alarm or if you are instructed to evacuate, leave your work area immediately and proceed to the nearest exit, and leave the building. If you are the first to recognize a fire situation, activate the alarm, evacuate to a safe location using the nearest exit, and notify the Department of Campus Safety (641-269-4600), Police Emergency or dial 911.

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

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

Basic “Shelter-in-Place” Guidance
If an incident occurs and the building you are in is not damaged, stay inside in an interior room until you are told it is safe to come out. If your building is damaged, take your personal belonging (purse, wallet, access card, etc.) and follow the evacuation procedures for your building (close your door, proceed to the nearest exit, and use the stairs instead of the elevators). Once you have evacuated, seek shelter at the nearest College building quickly. If police or fire department personnel are on the scene, follow their directions.

In the event of an emergency, the Grinnell Community may be asked to evacuate or shelter in place. In the event of a fire, fire alarm, or other issue that requires people to leave the building, the emergency alert will instruct how to evacuate. If evacuation is required, people are asked to evacuate calmly through the nearest exit and out of the building, to be mindful of all the exits,
not use an elevator, and to assist those that may need help. In addition, they are asked to not re-enter the building until given the “all-clear” by the fire department.

Shelter in place is a precaution intended to keep people safe while remaining indoors. The request to shelter in place may come from the Pioneer Alert System, Grinnell Police Department, or another Public Safety authority. If the Pioneer Alert is used, the Grinnell Community will simultaneously be notified, told to bring everyone into one’s work or classroom area(s), and to shut and lock the door(s) if possible, and to wait in the location until given an “all clear” or told to evacuate.

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

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

Grinnell-in-London (GIL)
In the event of an incident that requires the immediate notification of the Grinnell-in-London (GIL) campus community, various systems are in place for communicating information quickly. Some or all of these methods of communications may be activated. There are primary notification systems in place, which are typically utilized to reach the GIL campus community. These include telephone messages, SMS/text messages, email, Facebook and WhatsApp. Secondary notification systems are also in place that include local (main campus) media outlets (radio, local television), face-to-face, and the Pioneer Alert System. Grinnell College students, faculty and staff are automatically enrolled in the campus emergency notification system, Pioneer Alert, with the information the College has on record. The students, faculty and staff can update their contact information or opt out of the system, although that is discouraged. Updates to Pioneer Alert accounts can be completed through the Pioneer Alert portal located on the Campus Safety page on GrinnellShare.

Emergency notification systems are activated upon confirmation of an imminent threat to the health and safety of the GIL community. The IES Abroad Personnel is responsible for
confirming an emergency, with the assistance of the Director of Grinnell-in-London, local first responders, and/or IFSA-Butler staff.

The decision to initiate the systems is made by IES Abroad Personnel or Resident Director and they will contact all students, faculty, and staff on the program in an effort to immediately determine their whereabouts and confirm their safety. Students, faculty, and staff have been directed (and will be reminded) to send an immediate reply. Once they have been notified, the Resident Director or IES Abroad Personnel will contact the Program Manager to inform them of the whereabouts and safety of the students, faculty, and staff. The Resident Director and Director of Off-Campus Study will also discuss and determine if any additional actions or notification is necessary. Visiting Grinnell College Faculty will provide support as requested.

Follow-up information will be provided to the GIL Community using some or all of the systems described above. The larger community, parents, neighbors, and other interested parties can access emergency information through the College website or the media.

In the event of an emergency, the GIL Community may be asked to evacuate or shelter in place. In the event of a fire, fire alarm, or other issue that requires people to leave the building, the emergency alert will instruct how to evacuate. If evacuation is required, people are asked to evacuate calmly through the nearest exit and out of the building, to be mindful of all the exits, not use an elevator, and to assist those that may need help. In addition, they are asked to not re-enter the building until given the “all-clear” by the fire department.

Shelter in place is a precaution intended to keep people safe while remaining indoors. The request to shelter in place may come from the Emergency Notification Systems, Metropolitan Police Department, or another Public Safety authority. If the Emergency Notification System is used, the GIL Community will simultaneously be notified, told to bring everyone into one’s work or classroom area(s), and to shut and lock the door(s) if possible, and to wait in the location until given an “all clear” or told to evacuate.

Timely Warning Notification

Timely Warning Notification – Main Campus, Conard Environmental Research Area (CERA), and Grinnell-in-London (GIL)

The Department of Campus Safety is authorized by the College to maintain accurate law enforcement records of all criminal activity on campus, near campus, or involving the College community.

All allegations will be investigated. These investigations may be made in conjunction with the Grinnell Police Department or other law enforcement agencies. When alleged perpetrators are identified as students, the case will be shared with the Associate Vice President of Student Affairs, or designee, for investigation and appropriate action. When alleged perpetrators are identified as employees, the case will be shared with the Associate Vice President of Human Resources, or designee, for investigation and appropriate action. Criminal investigation, arrest, and prosecution can occur independently, before, during or after the student or employee conduct processes.

In the event a Clery Act crime is reported or a situation arises, within the Grinnell College Clery Geography (On Campus, Public Property and Noncampus property), that, in the judgment of the Department of Campus Safety and in consultation with responsible authorities when time
permits, constitutes a serious or continuing threat, a campus wide “timely warning” notice will be issued.

Timely Warnings will be distributed as soon as pertinent information is available, in a manner that withholds the names of the victims as confidential, and that will aid in the prevention of similar occurrences.

The Director of Campus Safety will classify reports according to the FBI Uniform Crime Reporting (UCR) classifications.

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

- Murder/Non-Negligent Manslaughter
- 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)
- Major incidents of Arson
- Other Clery crimes as determined necessary by the Director of Campus Safety, or his or her designee in his or her absence.

Cases of aggravated assault and sex offenses are considered on a case-by-case basis, depending on the facts of the case and the information known by Campus Safety. For example, if an assault occurs between two students who have a disagreement, there may be no on-going threat to other Grinnell College community members and a Timely Warning would not be distributed. Cases involving property crimes will be assessed on a case-by-case basis and alerts will typically be sent if there is a discernible pattern of crime.

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. Sex offenses will be considered on a case-by-case basis depending on when and where the incident occurred, when it was reported, and the amount of information known by Campus Safety.

The Director of Campus Safety, or designee, determines if there is a serious or continuing threat to the College community and if the distribution of a Timely Warning is warranted. Timely Warnings may also be posted for other crime classifications and locations, as deemed necessary.

Timely Warning messages are typically created, authorized, and sent by the Department of Campus Safety, the Division of Student Affairs, or the Office of Communications. In such cases, timely warnings will be issued to the campus community via email blast to all Grinnell College assigned email accounts. Timely warnings may be also published using some or all of the following methods of communications: campus memo, postings by Campus Safety throughout campus, and the Campus Safety website. Grinnell College has requested from the local police their cooperation in informing the institution about situations reported to them that may warrant a Timely Warning.

For the Grinnell-in-London campus, the resident director, or their designee(s) are responsible for preparing and distributing the Timely Warning via email blast to its faculty, staff and students.

The institution is not required to issue a Timely Warning with respect to crimes reported to a pastoral or professional counselor.
Alcohol and Other Drugs Policies

All Campuses – Main, CERA and Grinnell-in-London

In accordance with the federal Drug-Free Workplace Act of 1988, the federal Drug-Free Schools and Communities Act (DFSCA) of 1989, and State policies on Alcohol and Other Drugs, Grinnell College prohibits the unlawful and unauthorized possession, use, distribution, manufacture, and of sale of alcoholic beverages and illegal drugs. The Department of Campus Safety will enforce college policy regarding alcohol and other drugs. The Grinnell Police Department has primary responsibility for enforcement of Federal and State laws for alcohol and drug law violations for criminal prosecution.

Students

Grinnell College will impose educational conduct outcomes on students who violate the alcohol and drug policy. While each case will be considered individually, the sanctions will be consistently enforced. These educational outcomes include, but may not be limited to: verbal warning, conduct warning, substance abuse evaluation, behavioral expectations, parental/guardian notification, hearing before a conduct hearing board, conduct probation, suspension, dismissal, community restitution fines, community service work and/or referral for prosecution. Student conduct action, such as suspension or dismissal, will appear on college transcripts.

Grinnell College opposes the illegal use and abuse of alcohol and drugs in the college environment. Because of the serious problems related to the misuse of alcoholic beverages and illicit drugs, and because this practice can lead to a loss of effectiveness in human life and can hinder the educational process, the College takes a position of serious concern about, and opposition to, the misuse of alcoholic beverages - including underage drinking - and the use of illicit drugs in the college community. Therefore, the College urges all students to exercise mature judgment and social responsibility when making decisions regarding the use of alcohol or drugs.

A number of different penalties may be imposed by the magistrate or other representatives of the civil judicial system for violations for state alcohol and federal/state drug laws, including underage drinking. Penalties include criminal charges, ranging from a simple misdemeanor to a felony. Sentencing may include one or more of the following: monetary fines, incarceration, and community service. Penalties may be different for persons under or over the age of 18 years old. Persons under 18 who violate drug and alcohol laws may be turned over to juvenile authorities or may be dealt with through the court system. Persons over 18 are dealt with through the court system. Persons over 18 who are charged with the use or possession of illegal drugs are treated as adults. Fines, jail sentences, and community service are at the discretion of the magistrate or district court judge.

There are also campus educational outcomes if there is evidence that a student is illegally using alcohol or drugs or is abusing alcohol or drugs. A Student Affairs dean and/or a Campus Safety staff member may bring charges against the student. If a student would like to bring charges against another student, they may do so after consulting a Student Affairs staff member (including an RLC). All hearings are confidential and are held in closed session.

The hearing board presiding officer will forward its findings and sanction recommendations to the Dean of Students. While the Dean of Students may accept, reject, or modify the educational
outcome recommendations, outcomes will be imposed on students who are found in violation of the College alcohol and drug policy.

Educational outcomes may include, but are not limited to:

- Requiring that the student seek advising from Student Affairs staff.
- Participation in Brief Alcohol Screening and Intervention for College Students (BASICS) or a brief marijuana screening and intervention.
- Requiring that the student receive a substance abuse assessment and/or substance abuse education from a local agency.
- Requiring the completion of an appropriate rehabilitation program.
- Recommending disciplinary action that may include conduct warning, conduct probation, deferred finding of responsibility, behavioral expectations, parental/guardian notification, residence hall suspension, residence hall dismissal, suspension, dismissal, community restitution fines, community service work, and/or referral for prosecution.
- Barring the student from hosting/serving/wrist banding/purchasing future parties.

If the student fails to complete or abide by any imposed outcomes, the hearing board or Dean of Students reserves the right to take further action.

This policy information is located in the Student Handbook.

Employees
Grinnell College is required by the United States Government to comply with two separate laws concerning drugs: The “Drug-Free Workplace Act” of 1988 (Public Law 100-690) and the “Drug-Free Schools and Communities Act” of 1989 (Public Law 101-226). Grinnell College prohibits the unlawful manufacture, distribution, dispensation, possession or use of illicit drugs and alcohol by its employees in the workplace, on College property, or as part of any College-sponsored activity.

Grinnell College will impose sanctions on employees who violate its Alcohol and Other Drugs Policy. The College will impose such sanctions consistently and in a manner that complies with applicable state, federal, and local laws. Sanctions for employees will be determined by the Director of Human Resources. Possible sanctions include immediate dismissal, probation, suspension, reprimand, or requiring employees to participate in a drug abuse assistance or rehabilitation program. The College also retains the right to refer any violator of its Alcohol and Other Drugs Policy to applicable federal, state, or local authorities for criminal prosecution.

This policy information is located in the Faculty Handbook and the Staff Handbook.

Educational Programs – Main Campus
Through the Division of Student Affairs, and specifically New Student Orientation, Residence Life, and the Director of Wellness and Prevention, and other departments and offices, a variety of educational opportunities exist. Individual, group and community educational programs and interventions designed to prevent and reduce alcohol and other drug use/abuse are offered to the Grinnell community. In addition, the Harm Reduction Committee, a campus committee comprised of students, staff, and faculty, meets every other week to discuss campus issues related to alcohol and other drugs. As mandated by the Drug-Free Schools and Communities Act, this policy is distributed to all students, staff and faculty on an annual basis, and during
every even year, a biennial review of the comprehensive alcohol and other drug program is conducted. For more information concerning current programs, interventions and policies, contact the Director of Wellness & Prevention.

The Grinnell College Division of Student Affairs, and specifically the Director of Wellness & Prevention, coordinates and/or implements individual, group, and community initiatives designed to educate the campus community on the dangers of alcohol and other drug use, and to prevent and reduce alcohol and other drug use and abuse. The Director of Wellness works with the New Student Orientation (NSO) planning committee, Residence Life, and other departments and offices on campus to sponsor these opportunities.

Some of the offered programs include, but are not limited to:

<table>
<thead>
<tr>
<th>Program</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ever Fi (Alcohol.edu)</td>
<td>An interactive online program designed to reduce the negative consequences of alcohol amongst students. It delivers a personalized experience to all types of students dependent on their current drinking choices and is proven effective. All incoming students take parts 1 &amp; 2 in August and part 3 45 days later.</td>
</tr>
<tr>
<td>New Student Orientation</td>
<td>Harm Reduction Community Values sessions, which include education on the college's community standards, and ways to prevent and reduce alcohol and other drug use/abuse.</td>
</tr>
<tr>
<td>Parental and Family Education</td>
<td>&quot;Sex, Drugs, and Rock-N-Roll: Supporting Students Wellness (From Afar)&quot; session during New Student Orientation for parents and families. Includes strategies for supporting their students in a developmentally appropriate way including topics of sleep, stress, alcohol and other drugs, and sexual respect.</td>
</tr>
<tr>
<td>Harm Reduction Committee</td>
<td>A campus committee comprised of students, staff, and faculty that meets every other week to discuss campus issues related to alcohol and other drugs.</td>
</tr>
<tr>
<td>Substance-free residence halls</td>
<td>Four substance-free residence halls in which community members commit to living a substance-free lifestyle.</td>
</tr>
</tbody>
</table>

As mandated by the federal Drug-Free Workplace Act of 1988 and the federal Drug-Free Schools and Communities Act (DFSCA) of 1989, the alcohol and other drug policies are distributed to all students, staff and faculty on an annual basis. Grinnell College publishes a Biennial Review in accordance with the Drug Free Schools and Communities Act. The Biennial Review is published on even calendar years. A copy of the most recent Biennial Review can be obtained by contacting Grinnell College Student Affairs at (641) 269-3700.

Educational Programs – Conard Environmental Research Center (CERA)
Students are informed that CERA has the same drug and alcohol policies as the main campus. Summer interns and student workers (during the academic year) are told of the dangers of using power equipment under the influence of drugs and alcohol.

Educational Programs – Grinnell-in-London (GIL)
Students participating in the GIL program receive their primary alcohol and other drug education and programing while on the main campus. GIL participants do receive information relative to the Grinnell-in-London campus during pre-departure and on-site orientations, as well as information published in the GIL Student Handbook and the IES Abroad Essentials document for London.
Anyone 18 years old or older is legally allowed to drink in the United Kingdom and throughout Europe. Students that drink are more vulnerable targets of crime and more likely victims of accidents if they are intoxicated. It is also noted that drinks in the UK and Europe are usually both higher in alcohol percentage and larger in quantity. Participants are advised to be cautious and careful in deciding whether or not to drink, how much to drink and when and where to drink.

Because Grinnell College receives U.S. Federal funds, using, carrying and dealing in banned drugs is an offense against the law. Students convicted of any such offense risk being deported from the country. While affording reasonable advice to its participants in difficulties with the law, the program will provide no shelter from the consequences of illegal acts and cannot act as legal counsel for its students. Program participants traveling during break periods in the other countries should be especially aware that penalties for even small violations of drug laws might be severe, including long spells in prison awaiting trial. The Resident Director can pursue College disciplinary action against students for violation of the alcohol and drug laws while at the campus.

Building Access, Security and Maintenance to Campus Facilities

Building Access and Security – Main Campus

Academic and Administrative Buildings

Generally, academic and administrative buildings are accessible from 6:00 a.m. until 12:00 am (midnight) daily either via building unlock schedules and/or access card. Hours are expanded or reduced for events, holidays, breaks, and during urgent or necessary circumstances as it is seen fit by College administrators. Some facilities, such as the Joe Rosenfield Center and the Burling Library, have individual hours, and the hours may vary at different times during the year.

Outside of open hours, facilities are generally locked. After a building is locked, employees and students must possess a College identification card if present in the facility. Identification must be provided when requested by the Department of Campus Safety. Others using the facility must possess and present a picture identification card when requested by Campus Safety, and must be accompanied by an employee or student as a guest.

During open hours, Campus Safety Officers routinely patrol academic and administrative buildings. Outside of open hours, Campus Safety Officers patrol these buildings to secure open spaces and verify identification of remaining occupants. Exterior doors are typically locked and unlocked by Campus Safety using an electronic access control system and standard keys.

The primary function of the Grinnell College campus is for the use of students, faculty, staff and their escorted guests, and those on official business with Grinnell College. Persons unaffiliated with Grinnell College are regularly on campus for events and for use of the Burling Library. Persons unaffiliated with Grinnell College may be asked to leave or be trespassed from the College if loitering or involved in an incident.

Residence Halls and Houses

Residence Halls and College owned residential houses are secure 24 hours a day and are accessible to resident students by card access. During holidays and breaks, the Residence Halls and College owned residential houses remain locked 24 hours a day and are inaccessible.
to students, employees, and guests with the exception of essential staff (Facilities Management and Campus Safety).

Residence Life professional and student staff assist in the monitoring and reporting of security and physical plant concerns in Residence Halls and College owned residential houses. Resident students are also helpful in creating a safe living environment by restricting unauthorized access and reporting security and physical plant concerns.

**Security Considerations Used in the Maintenance of Campus Facilities**

Facilities and landscaping are maintained by Facilities Management in a manner that minimizes hazardous conditions, and with an interest toward the general safety and security of faculty, staff, students, and guests. Facilities Management staff and Campus Safety Officers report safety and security hazards during the course of their regular duties.

Facilities Management regularly audits fire safety equipment, elevator, door and lock, and other critical infrastructure. Campus Safety frequently conducts security surveys, exterior lighting surveys, and inspections of electronic security systems in and ongoing effort to maintain existing conditions.

Channels of internal communications exist to facilitate the repair or improvement of security systems and critical infrastructure on campus. Facilities Management recognizes the importance of responding promptly to all safety, security, and critical infrastructure needs.

In order to keep buildings safe and in good repair, it is important to promptly report maintenance problems. For plumbing, electrical, heating, elevator, door lock, key, and other maintenance concerns, contact Facilities Management at (641) 269-3300. On weekends and holidays, or after 3:30 p.m. on weekdays, call the Department of Campus Safety at (641) 269-4600.

**Building Access and Security – Conard Environmental Research Area (CERA)**

The Environmental Education Center (EEC) serves as the primary campus building at this location, and has card reader access entry which is monitored by the Department of Campus Safety located at the main campus. The EEC is scheduled to be open Monday-Friday, 8:00 a.m. – 5:00 p.m., and is also open for special events and activities that fall outside of the normal business hours. CERA staff are responsible for locking and unlocking buildings outside of normal business hours. During Winter Break and the Managed Deer Hunt, the EEC is locked at all times.

All other administrative buildings on site are locked at all times and accessible to authorized personnel via standard key.

**Maintenance – Conard Environmental Research Area (CERA)**

Facilities and landscaping are maintained by Facilities Management and CERA staff and volunteers in a manner that minimizes hazardous conditions and with an interest toward the general safety and security of faculty, staff, students, and guests.

Facilities Management regularly audits fire safety equipment, door and lock, and other critical infrastructure. Channels of internal communications exist to facilitate the repair and improvement of security systems and critical infrastructure on site. Facilities Management recognizes the importance of responding promptly to all safety, security, and critical infrastructure needs.
In order to keep buildings safe and in good repair, it is important to promptly report maintenance problems. For plumbing, electrical, heating, door lock, key and other maintenance concerns, contact Facilities Management at (641) 269-3300. On weekends and holidays, or after 3:30 p.m. on weekdays, call the Department of Campus Safety at (641) 269-4600.

The site in Grinnell-in-London is open and unlocked during regular business hours Monday through Friday, 8:00am-6:00pm. The building is locked after that time and only accessible by the staff who are key holders of the building.

Maintenance – Grinnell-in-London (GIL)
IFSA Butler Building Management Staff is responsible for the maintenance of the property for the Grinnell-in-London campus.

Missing Student Policy

Missing Student Policy – Main Campus
The Higher Education Opportunity Act (HEOA) requires institutions to adopt a policy regarding notification of law enforcement when residential students are determined missing for 24 hours.

When a student is missing, as defined in this policy, the Grinnell Police Department shall be immediately notified. Any person may report any Grinnell College student as missing by making a report to the Grinnell College Department of Campus Safety by calling (641) 269-4600.

For purposes of this policy, a student is missing when the student’s whereabouts are unknown or unexplained for a period of time that would be regarded as highly unusual or suspicious by persons familiar with the student’s plans, habits, or routines.

Upon receipt of a missing student report, the Department of Campus Safety will promptly begin efforts to locate the student on campus, at other sites controlled by the college and at other locations in which the student resides, working closely with the

- Division of Student Affairs
- Department of Residence Life
- Academic program or department in which the missing student is enrolled,
- Department in which the missing student is employed (in the event the student is employed by Grinnell College), and
- Local law enforcement agencies in the locations where the student resides.

Initial efforts to contact the student may involve telephone, e-mail, text message or other electronic communications such as use of meal plan car or building access card.

College personnel authorized by the Department of Campus Safety or the Division of Student Affairs may attempt to contact the student at their housing unit on campus or at their local residence.

If a student who resides in college-controlled housing units does not respond to initial efforts to make contact, Campus Safety or other authorized Student Affairs personnel may enter the
student’s room in order to assess the condition of the room and look for clues to explain the
student’s absence.

College personnel authorized by the Department of Campus Safety or the Division of Student
Affairs may pursue such additional or other investigative activities as are reasonable under the
circumstances.

No later than twenty-four hours after the time a student is determined to be missing, as defined
under this policy, Grinnell College shall initiate the following missing student contact procedures:

- The Department of Campus Safety shall notify local law enforcement agencies such as
  the Grinnell Police Department, the Poweshiek County Sheriff’s Office, and other law
  enforcement agencies in locations where the student resides in an attempt to locate the
  missing student, unless the local law enforcement agency was the entity that made the
determination that the student is missing
- The Department of Campus Safety or Division of Student Affairs must notify the Missing
  Student contact person(s) designated by the student in the Missing Student Contact
  Database that the student is missing.
- The Department of Campus Safety or Division of Student Affairs must notify the
  student’s custodial parents or legal guardians in the case of unemancipated students
  under the age of eighteen, in addition to notifying any additional contact person
designated by the student.

Students residing in campus housing will be informed annually that each student has the option
to identify a person designated as a confidential missing person contact to be notified in the
event the student is missing. This information can be updated at any time by the student. All
students living in college-controlled housing, will be provided with confidential means to
designate and update the Missing Person Contact on an annual basis using the Missing Person
Contact Information page on the Grinnell College WebAdvisor registration software. This
program contains a special section for student to provide Missing Person contact information.

Students are advised that their Missing Person contact information will be maintained by the
College as a confidential student record and will be accessible only to specifically designated
authorized college officials. This confidential information may not be disclosed except to law
enforcement personnel in furtherance of a missing student investigation. The College will
inform students under the age of eighteen that, in the event they are unemancipated and
determined to be missing, their custodial parent or legal guardian must be notified within 24
hours, in addition to notifying any additional contact person designated by the student.

Regardless of whether the student has identified a contact person, is above the age of 18, or is
an emancipated minor, Grinnell College will inform the Grinnell PD (or the local law enforcement
with jurisdiction) that the student is missing within 24 hours.

**Missing Student Policy – Conard Environmental Research Area (CERA)**
Grinnell College does not have on-campus student housing facilities at the Conard Environment
Research Area (CERA) and is not required to publish a Missing Student Policy for this campus.
Missing Student Policy – Grinnell-in-London (GIL)
Grinnell College does not have on-campus student housing facilities at the Grinnell-in-London (GIL) campus and is not required to publish a Missing Student Policy for this campus.

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

During the 2020-2021 academic year, Grinnell College did not offer any crime prevention or security awareness programs. Due to COVID-19, most students lived and learned away from Grinnell College campus.

All crime prevention and security awareness programs encourage students and employees to be responsible for their own security and the security of others. Participants in these programs are asked to be alert, security-conscious and involved and advised to call the Department of Campus Safety to report suspicious behavior. For additional questions regarding crime prevention, contact the department directly at (641) 269-4600.

Crime Awareness and Security Awareness Programs – Main Campus
There are several programs in place to educate and train the Residence Life Coordinators (RLC’s) on crime awareness and security on campus. These programs include campus specific emergency training (including appropriate reference materials), including how to respond to situations that could arise from alcohol and other drugs on campus. The RLC’s also receive Title IX training and Active Bystander training, which are explained further in the Sexual Assault, Sex Offenses, and Sexual Misconduct Section.

Community Advisors (CA’s) and House Coordinators receive training related to their positions. These training programs help prepare them to respond to different on-campus situations (including alcohol and other drugs), basic first aid, and mental health first aid. They also receive Title IX training and Active Bystander training, which are explained further in the Sexual Assault, Sex Offenses and Sexual Misconduct Section.

Several campus offices collaborate to provide Title IX training and Active Bystander training for students, faculty and staff. These trainings occur throughout the academic and target new students and employees during new student orientation and employee orientation. Follow up trainings are also offered to current students and employees on a yearly basis.

In addition to Title IX training, Grinnell College also hosts several events for Sexual Assault Awareness month and Intimate/Domestic Partner Violence awareness month. These events are open to all Grinnell College community members.

Students receive several trainings related to crime and security awareness, which primarily occur during New Student Orientation (NSO) and SA floor meetings. They are introduced to the roles served by the Department of Campus Safety. Community value and harm reduction sessions cover many topics, including the student’s own security and their awareness of the security of others as members of the campus community, residence hall security, drug and alcohol abuse awareness and sexual assault prevention.
Grinnell College also provides an escort service through the Department of Campus Safety to all Grinnell College community members as a safe mode of transportation around campus. This service is available 24/7 on an as needed basis.

Grinnell College also engages a group of students, faculty, and staff to serve on the Harm Reduction Committees and Title IX advisory committees. These committees meet throughout the academic year to discuss issues and have conversations about alcohol and other drug use as well as sexual assault.

**Crime Awareness and Security Awareness Programs – Conard Environmental Research Center (CERA)**

All crime prevention and security awareness programs encourage students and employees to be responsible for their own security and the security of others. When new employees (staff/faculty), volunteers, summer restoration assistants (10-week summer interns) and student workers (during the academic year) first visit, CERA Manager delivers an 8-hour CERA Safety Orientation, which includes information on the Emergency Procedures, Personal Safety, and Power Equipment Safety, as well as Fire/Tornado Drills.

When formal classes, students groups, and staff/faculty workshops are held at CERA, CERA Manager delivers Safety Orientation program, describing CERA’s Emergency Procedures and Personal Safety and offering handouts with information.

Personal Safety education includes:

- Tick prevention and removal procedure, tick identification and collection for Lyme Disease detection, and Lyme Disease symptoms and procedures for testing are described. Students are given access to handouts and links to online information sources.
- Poison Ivy/Wild Parsnip prevention is described; students are shown where special soap is located; students are offered rubber boots if they don’t have suitable footwear.
- Sunburn/Heat exhaustion prevention is described, students are taught warning signs and urged to pay attention to their own welfare as well as the welfare of other students in class.
- Dehydration prevention is described; students who don’t have water bottles are given them and shown where to fill up.

All new employees are also required to take Active Bystander training within 6 months of their start date.

**Crime Prevention and Security Awareness Programs – Grinnell-in-London (GIL)**

For students there is a pre-departure orientation in April and on-site orientation in late August/early September. Students are directed to the GIL Student Handbook as well as resources provided by our London partner, IES Abroad, on matters of health and safety in London. The pre-departure orientation in April addresses concerns with personal safety in London, including the prevention of crimes. The on-site orientation at the end of the summer addresses campus security procedures and practices, including who to contact when, and repeats advice for preventing types of crimes common in London. The on-site orientation is conducted by our Resident Director, together with a representative from IES Abroad, our source
of emergency support services in London. The on-site orientation includes programming
designed to encourage students and employees to be responsible for their own safety as well
as the safety of others, including paying attention to levels of alcohol consumption.

For faculty and staff, the Resident Director consults with the Office of Off-Campus Study and
other relevant campus offices on best practices for campus security procedures and practices.
This takes place throughout the year, with annual updates incorporated into students’ pre-
departure orientation in April. Any additional updates in training for other London faculty and
staff are completed before the start of the program in August. Grinnell-in-London requires
visiting faculty from Grinnell College to attend the students’ on-site orientation in order to be
familiar with safety and security procedures in London.

**Sexual Assault, Sex Offenses and Sexual Misconduct**
Grinnell College prohibits the offenses of domestic violence, dating violence, sexual assault and
stalking (as defined by the Clery Act) and reaffirms its commitment to maintaining a campus
environment that emphasizes the dignity and worth of all members of the college community. To
that end, Grinnell College issues this statement of policy to inform the campus community of our
programs, policies, and procedures to address domestic violence, dating violence, sexual
assault, and stalking. These policies and procedures will be followed regardless of whether an
incident occurred on or off campus when it is reported to a college official.

**Crime Definitions – Clery Act**
The following crime definitions are listed as defined by the Clery Act.

**Dating Violence** is violence committed by a person who is or has been in a social relationship
of a romantic or intimate nature with the victim.

- The existence of such a relationship shall be based on the reporting party’s statement
  and with consideration of the length of the relationship, the type of relationship, and the
  frequency of interaction between the persons involved in the relationship.
- For the purposes of this definition, Dating Violence includes, but is not limited to, sexual
  or physical abuse or the threat of such abuse.
- Dating Violence does not include acts covered under the definition of Domestic Violence.

**Domestic Violence** is a felony or misdemeanor crime 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 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 the violence occurred.
For the purposes of complying with the requirements of this section and §668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

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

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

**Fondling** is defined as the touching of the private body 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** is defined as sexual intercourse between persons who are related to each other within the degrees where in marriage is prohibited by law.

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

**Stalking** is engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for their safety or the safety of others; 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.

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

**Crime Definitions – Jurisdictional Definitions**

The following crime definitions are listed as defined by the local law jurisdiction of the Main Campus (Grinnell, Iowa) and CERA Campus (Kellogg, Iowa).

**Dating Violence** – Currently, Iowa law does not have a definition for Dating Violence. If a person is in a dating relationship where they are not living together, not married, and do not have any kids and an act of violence occurs, such behavior is defined as an assault.
Domestic Violence – Iowa law combines two sections of the criminal code to define domestic violence. The assault code, which defines criminal behavior (Iowa Code 708.1 assault) and the Domestic Abuse Act, which defines a domestic relationship, (Iowa Code 236.2).

"Domestic abuse" is committing assault, as defined in section 708.1, under any of the following circumstances:

- The assault is between family or household members who reside together at the time of the assault.
- The assault is between separated spouses or persons divorced from each other and not residing together at the time of the assault.
- The assault is between persons who are parents of the same minor child, regardless of whether they have been married or have lived together at any time.
- The assault is between persons who have been family or household members residing together within the past year and are not residing together at the time of the assault.
- The assault is between persons who are in an intimate relationship or have been in an intimate relationship and have had contact within the past year of the assault. In determining whether the persons are or have been in intimate relationship, the court may consider:
  - The duration of the relationship
  - The frequency of interaction
  - Whether the relationship has been terminated
  - The nature of the relationship, characterized by either party’s expectation of sexual romantic involvement.
- A person may be involved in intimate relationship with more than one person at a time.
- “Family or household members” means spouses, persons cohabiting, parents, or other persons related by consanguinity or affinity. This does not include children under age 18 or household members who reside together at the time of the assault.
- “Intimate relationship" means a significant romantic involvement that need not include sexual involvement. An intimate relationship does not include casual social relationship or associations in a business or professional capacity.

Sexual Abuse (Iowa Code section 709.1) - Any sex act between persons is sexual abuse by either of the participants when the act is performed with the other participant in any of the following circumstances:

- The act is done by force or against the will of the other. If the consent or acquiescence of the other is procured by threats or violence toward any person, or if the act is done while the other is under the influence of a drug-inducing sleep or is otherwise in a state of unconsciousness, the act is done against the will of the other.
- Such other participant is suffering from a mental defect or incapacity which precludes giving consent, or lacks the mental capacity to know the right and wrong of conduct in sexual abuse.
- Such other participant is a child.
Consent, in reference to sexual activity, as defined by the State of Iowa - The College has determined, based on good-faith research, that the term “consent” with reference to sexual activity is not specifically defined in Iowa law although consent is referenced in Iowa Code 709.1 Sexual Abuse.

Consent, in reference to sexual activity, as defined by Grinnell College – Grinnell College has an institutional definition of “consent”, which is stated and explained in the document, Grinnell College Policy, Procedures and Guide to Preventing, Reporting, and Responding to Sexual Misconduct and Other Forms of Interpersonal Violence. This document is referred to interchangeably as a policy or guide for handling related matters. A copy of the Grinnell College Policy, Procedures and Guide to Preventing, Reporting, and Responding to Sexual Misconduct and Other Forms of Interpersonal Violence is available on the college website.

The institutional definition of consent is used when addressing Sexual Misconduct and Other Forms of Interpersonal Violence on all Grinnell College’s campuses. The policy is based on affirmative consent. When evaluating consent, the College will consider the objectively apparent indicia of consent (or lack of consent) from a reasonableness perspective.

In the spring of 2012, the Grinnell College student body voted overwhelmingly to revise the then-existing Sexual Harassment and Misconduct policy to incorporate affirmative consent. Consent to engage in sexual activity must be given knowingly, voluntarily, and affirmatively. Consent to engage in sexual activity must exist from the beginning to the end of each instance of sexual activity and for each form of sexual contact. Consent is demonstrated through mutually understandable words and/or clear, unambiguous actions that indicate a willingness to engage freely in sexual activity. Consent is active, not passive. This means:

- Each participant in a sexual encounter is expected to obtain and give consent to each act of sexual activity. Consent to one form of sexual contact does not constitute consent to engage in all forms of sexual contact.
- Consent consists of an outward demonstration indicating that an individual has freely chosen to engage in sexual activity. Relying on non-verbal communication can lead to misunderstandings or potential policy violations. Consent may not be inferred from silence, passivity, lack of resistance, or lack of an active response alone. A person who does not physically resist or verbally refuse sexual activity is not necessarily giving consent.
- If at any time it is reasonably apparent that either party is hesitant, confused, or unsure, both parties should stop and obtain mutual verbal consent before continuing such activity.
- Consent may be withdrawn by either party at any time. Withdrawal of consent must also be outwardly demonstrated by mutually understandable words or clear, unambiguous actions that indicate a desire to end sexual activity. Once withdrawal of consent has been expressed, sexual activity must cease.
- Individuals with a previous or current intimate relationship do not automatically give initial or continued consent to sexual activity. Even in the context of a relationship, there must be mutually understandable communication that clearly and unambiguously indicates a willingness to engage in sexual activity.
- Consent is not affirmative if it results from the use or threat of physical force, intimidation, or coercion, or any other factor that would eliminate an individual’s ability to
exercise their own free will to choose whether or not to have sexual contact.

- An individual who is physically incapacitated from alcohol and/or other drug consumption (voluntarily or involuntarily), or is unconscious, asleep, unaware, or otherwise mentally or physically helpless is considered unable to give consent.

- In the state of Iowa, consent can never be given by minors under the age of 16.

**Stalking** – (Iowa Code section 708.11) - A person commits stalking when all of the following occur:

- The person purposefully engages in a course of conduct directed at a specific person that would cause a reasonable person to fear bodily injury to, or the death of, that specific person or a member of the specific person’s immediate family.

- The person has knowledge or should have knowledge that the specific person will be placed in reasonable fear of bodily injury to or the death of, that specific person or a member of the specific person’s immediate family by the course of conduct.

- The person’s course of conduct induces fear in the specific person of bodily injury to, or the death of, the specific person or a member of the specific person’s immediate family.

- “Course of conduct” means repeatedly maintaining a visual or physical proximity to a person without legitimate purpose or repeatedly conveying oral or written threats implied by conduct, or a combination thereof, directed at or toward a person.

- “Immediate family member” means a spouse, parent, child, sibling, or any other person who regularly resides in the household of a specific person, or who within the prior six months regularly resided in the household of a specific person.

- “Repeatedly” means on two or more occasions.


The following crime definitions are listed as defined by the local law jurisdiction of the Grinnell-in-London Campus (London, England)

**Offense of Controlling or Coercive Behavior** (Serious Crime Act 2015, Section 76) - A person “A” commits an offence if— “A” repeatedly or continuously engages in behavior towards another person “B” that is controlling or coercive, at the time of the behavior, “A” and “B” are personally connected, the behavior has a serious effect on “B”, and “A” knows or ought to know that the behavior will have a serious effect on “B”.

“A” and “B” are “personally connected” if— “A” is in an intimate personal relationship with “B”, or “A” and “B” live together and— they are members of the same family, or they have previously been in an intimate personal relationship with each other.

But “A” does not commit an offence under this section if at the time of the behavior in question— “A” has responsibility for “B”, for the purposes of Part 1 of the Children and Young Persons Act 1933 (see section 17 of that Act), and “B” is under 16.

“A’s” behavior has a “serious effect” on “B” if it causes “B” to fear, on at least two occasions, that violence will be used against “B”, or it causes “B” serious alarm or distress which has a substantial adverse effect on “B’s” usual day-to-day activities.
For the purposes of subsection (1)(d) “A” “ought to know” that which a reasonable person in possession of the same information would know.

For the purposes of subsection (2)(b)(i) “A” and “B” are members of the same family if—

(a) they are, or have been, married to each other; (b) they are, or have been, civil partners of each other; (c) they are relatives; (d) they have agreed to marry one another (whether or not the agreement has been terminated); (e) they have entered into a civil partnership agreement (whether or not the agreement has been terminated); (f) they are both parents of the same child; (g) they have, or have had, parental responsibility for the same child.

Domestic Violence is any incident or pattern of incidents of controlling, coercive or threatening behavior, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexual orientation. This can encompass, but is not limited to, the following types of abuse: psychological; physical; sexual; financial; emotional.

Rape (UK Sexual Offences Act 2003, Part 1) - A person “A” commits an offence if he intentionally penetrates the vagina, anus or mouth of another person “B” with his penis, “B” does not consent to the penetration, and “A” does not reasonably believe that “B” consents. Whether a belief is reasonable is to be determined having regard to all the circumstances, including any steps “A” has taken to ascertain whether “B” consents. Sections 75 and 76 apply to an offence under this section. A person guilty of an offence under this section is liable, on conviction on indictment, to imprisonment for life.

Rape of a child under 13 (UK Sexual Offences Act 2003, Part 1) - A person commits an offence if—he intentionally penetrates the vagina, anus or mouth of another person with his penis, and the other person is under 13.

Assault by Penetration (UK Sexual Offences Act 2003, Part 1) - A person “A” commits an offence if he intentionally penetrates the vagina or anus of another person “B” with a part of his body or anything else, the penetration is sexual, “B” does not consent to the penetration, and “A” does not reasonably believe that “B” consents. Whether a belief is reasonable is to be determined having regard to all the circumstances, including any steps “A” has taken to ascertain whether “B” consents. Sections 75 and 76 apply to an offence under this section. A person guilty of an offence under this section is liable, on conviction on indictment, to imprisonment for life.

Sexual Assault (UK Sexual Offences Act 2003, Part 1) - A person “A” commits an offence if he intentionally touches another person “B”, the touching is sexual, “B” does not consent to the touching, and “A” does not reasonably believe that “B” consents. Whether a belief is reasonable is to be determined having regard to all the circumstances, including any steps “A” has taken to ascertain whether “B” consents. Sections 75 and 76 apply to an offence under this section. A person guilty of an offence under this section is liable on summary conviction, to imprisonment for a term not exceeding 6 months or a fine not exceeding the statutory maximum or both; on conviction on indictment, to imprisonment for a term not exceeding 10 years.

Sexual activity with a child family member (UK Sexual Offences Act 2003, Part 1) - A person “A” commits an offence if he intentionally touches another person “B”, the touching is sexual, the relation of “A” to “B” is within section 27, “A” knows or could reasonably be expected to know
that his relation to “B” is of a description falling within that section, and either (i) "B" is under 18 and “A” does not reasonably believe that “B” is 18 or over, or (ii) "B" is under 13.

**Sexual activity with a child** (UK Sexual Offences Act 2003, Part 1) - A person aged 18 or over “A” commits an offence if he intentionally touches another person “B”, the touching is sexual, and either—(i) “B” is under 16 and “A” does not reasonably believe that “B” is 16 or over, or (ii) “B” is under 13. A person guilty of an offence under this section, if the touching involved—(a) penetration of “B”'s anus or vagina with a part of “A”'s body or anything else, penetration of “B”'s mouth with “A”'s penis, penetration of “A”'s anus or vagina with a part of “B”'s body, or penetration of “A”’s mouth with “B”’s penis, is liable, on conviction on indictment, to imprisonment for a term not exceeding 14 years.

**Consent** – (UK Sexual Offences Act 2003, Part 1, section 74) For the purposes of Part 1, a person consents if he agrees by choice, and has the freedom and capacity to make that choice.

**Stalking** (Controlling or Coercive Behavior in an Intimate or Family Relationship – Statutory Guidance Framework, December 2015, pg.23) - There is no legal definition of stalking. However, experts agree that ‘it is a long-term pattern of unwanted and persistent pursuit and intrusive behavior directed by one person to another that engenders fear and distress in the victim’. The Protection of Freedoms Act 2012 inserted two new stalking offences into the Protection from Harassment Act 1997 – see section 2A(stalking) and section 4A (stalking involving fear of violence or serious alarm/distress). Stalking includes repeated attempts to impose unwanted communications and/or contacts on another in a manner that could be expected to cause distress and/or fear in any reasonable person.

**Active Bystanderism**

Bystanders play a critical role in the prevention of sexual and relationship violence. Bystanders are “individuals who observe violence or witness the conditions that perpetuate violence. They are not directly involved, but have the choice to intervene, speak up, or do something about it.”

Grinnell College wants to promote a culture of community accountability where bystanders are actively engaged in the prevention of violence without causing further harm. Bystanders may not always know what to do, even if they want to help.

Below is a list of some ways to be an active bystander.

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

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2 Bystander Intervention Strategies adapted from Stanford University’s Office of Sexual Assault & Relationship Abuse.
• Indirect intervention works as well. Get creative – spill a drink, strike up a conversation, ask if one or both parties wants to get some food, and/or involve friends in a solution that fits the situation.

If you or someone else is in immediate danger, dial 911. This could be when a person is yelling at or being physically abusive towards another and it is not safe for you to interrupt.

**Risk Reduction Strategies**

Risk Reduction Strategies are options designed to decrease perpetration and bystander inaction; increase empowerment for victims in order to promote safety; and help individuals and communities address conditions that facilitate violence. With no intent to victim blame and recognizing that only abusers are responsible for their abuse, the following are some strategies to reduce one’s risk of sexual assault or harassment.3

1. **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.

2. Try to **avoid isolated areas**. It is more difficult to get help if no one is around.

3. **Walk with purpose**. Even if you don’t know where you are going, act like you do.

4. **Trust your instincts**. If a situation or location feels unsafe or uncomfortable, it probably isn’t the best place to be.

5. **Try not to load yourself down** with packages or bags as this can make you appear more vulnerable.

6. **Make sure your cell phone is with you** and charged and that you have cab money.

7. **Don't allow yourself to be isolated** with someone you don’t trust or someone you don’t know.

8. **Avoid putting music headphones in both ears** so that you can be more aware of your surroundings, especially if you are walking alone.

9. **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.

10. **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.).

11. **Don't leave your drink unattended** while talking, dancing, using the restroom, or making a phone call. If you’ve left your drink alone, just get a new one.

12. **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.

13. **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

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3 Rape, Abuse, & Incest National Network – RAINN [www.rainn.org](http://www.rainn.org)
her to a safe place immediately.

14. **If you suspect you or a friend has been drugged, contact law enforcement immediately** (local authorities can be reached by calling 911 in most areas of the U.S). Be explicit with doctors so they can give you the correct tests (you will need a urine test and possibly others).

15. If you need to get out of an uncomfortable or scary situation here are some things that you can try:
   - **Remember that being in this situation is not your fault.** You did not do anything wrong; it is the person who is making you uncomfortable that is to blame.
   - **Be true to yourself.** Don’t feel obligated to do anything you don’t want to do. “I don’t want to” is always a good enough reason. Do what feels right to you and what you are comfortable with.
   - **Have a code word with your friends or family** so that if you don’t feel comfortable you can call them and communicate your discomfort without the person you are with knowing. Your friends or family can then come to get you or make up an excuse for you to leave.
   - **Lie.** If you don’t want to hurt the person’s feelings, it is better to lie and make up a reason to leave than to stay and be uncomfortable, scared, or worse. Some excuses you could use are: needing to take care of a friend or family member, not feeling well, having somewhere else that you need to be, etc.

16. **Try to think of an escape route.** How would you try to get out of the room? Where are the doors? Windows? Are there people around who might be able to help you? Is there an emergency phone nearby?

17. **If you and/or the other person have been drinking,** you can say that you would rather wait until you both have your full judgment before doing anything you may regret later.

**Prevention and Awareness Programming**

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

- 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

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

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

- A statement that Grinnell College prohibits the crimes of domestic violence, dating violence, sexual assault and stalking (as defined by the Clery Act);

- Education on the definitions of domestic violence, dating violence, sexual assault and stalking according to any applicable jurisdictional definitions of these terms;
• The definition of consent, in reference to sexual activity, in the applicable jurisdiction; (If your local jurisdiction does not define consent, you must state that there is no definition).

• Education on what behavior and actions constitute consent, in reference to sexual activity, as defined by Grinnell College policy and the purposes for which that definition is used.

• A description of safe and positive options for bystander intervention.
  o 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.
  o Bystander intervention includes recognizing situations of potential harm, understanding institutional structures and cultural conditions that facilitate violence, overcoming barriers to intervening, identifying safe and effective intervention options, and taking action to intervene;

• Information on risk reduction. Risk reduction means options designed to decrease perpetration and bystander inaction, and to increase empowerment for victims in order to promote safety and to help individuals and communities address conditions that facilitate violence.

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

**Primary Prevention and Awareness Programs**
All first year students attend a Sexual Respect session at New Student Orientation, which covers prohibited conduct at the College, resources and options available to students, and scenario-based follow up sessions with their residence life coordinators and community advisors.

All first year international student undergraduates, most of who have come to the U.S. for the first time, participate in an on-line training called Student Success (Title IX for International Students) prior to their arrival. In addition, there is a one hour session titled “Let’s Talk About
Sex”, which takes place during the International Pre Orientation Program. These tools introduce themes related to sex and sexuality, gender, sexual misconduct, and campus resources - in a U.S. context. International students are also required to attend the New Student Orientation session on Sexual Respect, along with their U.S. peers. New Language Assistants, who hold a hybrid role of both student and staff member, participate in the IPOP programs, as well as a small group training with our Title IX coordinator.

Active Bystander training emphasizes safe and positive options. It is based on both the NCAA Step UP! Program and Mentors in Violence Prevention (MVP). In addition to these sessions, there are elements of active bystander training infused through New Student Orientation.

Risk Reduction is embedded in most of the training for students. Alcohol and other drug training is also considered risk reduction for sexual assault. The College does not offer separate risk-reduction training at this time, as it can be misunderstood as victim-blaming or putting the onus on potential victims to prevent their own assaults.

Grinnell College’s Title IX training includes an introduction to the role that Title IX plays on college campuses, a description of the prohibited conduct that falls under sexual harassment, covered parties under Title IX, interim remedies available, and reporting responsibilities of employees and student leaders. Title IX training at Grinnell College also covers brief information related to the Clery Act, which is geographically based crime reporting and the Violence Against Women Act and how the three laws intersect (Title IX, Jeanne Clery, and VAWA). The five goals of Title IX at Grinnell College are to promote a culture of healthy relationships and sexual respect, reduce or eliminate the incidence of sexual violence, maintain a trusted and comfortable reporting and referral environment, respond in a trauma-informed, compassionate, prompt, and fair way when a report of prohibited conduct is received, and to communicate effectively with the campus community. Title IX training and Active Bystander training is offered to all new students, faculty, and staff.

**Ongoing Prevention and Awareness Campaign**
Grinnell Advocates’ Campus-Wide Education and Awareness Programming is both timed to Domestic/Intimate Partner Abuse Awareness Month in October and Sexual Assault Awareness Month in April, as well as a Grinnell’s specific Sexual Assault Awareness Month in February. This programming is directed toward imparting a fuller understanding of the psychological, behavioral, situational and cultural dynamics of abusive situations and responses to them. Grinnell Advocates also bring in professionals in intimate partner and sexual abuse dynamics and response to Grinnell to engage long-term with particular sub-groups of the student (and faculty/staff) population for occasional awareness training sessions regarding culture-specific dynamics of abuse and response.

Grinnell College’s Intimate Partner/Dating/Domestic Violence Awareness month is recognized annually in October. Topics highlighted during this month include risk reduction strategies, security awareness, sexual assault prevention, and bystander intervention.

Grinnell College’s Sexual Assault Awareness month is recognized annually in February. Topics covered include but are not limited to: Alcohol and sex, consent, Sex Myths and Facts, and sexual assault and prevention.
Active Bystander training emphasizes safe and positive options. It is based on both the NCAA Step UP! Program and Mentors in Violence Prevention (MVP). In addition to these sessions, there are elements of active bystander training infused through New Student Orientation.

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Procedures Victims Should Follow

Main Campus and Conard Environmental Research Area (CERA)
After an incident of sexual assault, dating violence, domestic violence, or stalking the victim should consider seeking help from law enforcement and/or medical attention as soon as possible at Grinnell Regional Medical Center or another nearby care facility. In Iowa, evidence may be collected even if you choose not to make a report to law enforcement and the evidence can be kept with a case identification number separate from the name of the victim.

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 criminal offense occurred/or is occurring, or may be helpful in obtaining a protection order. In circumstances of sexual assault, if victims do not opt for forensic evidence collection, health care providers can still treat injuries and take steps to address concerns of pregnancy and/or sexually transmitted infections. Victims of sexual assault, domestic violence, stalking, and dating violence are encouraged to also preserve evidence by saving text messages, instant messages, social networking pages, other communications, and keeping pictures, logs or other copies of documents, if they have any, that would be useful to college adjudicators/investigators or police.

As time passes, evidence may dissipate or become lost or unavailable, thereby making investigation, possible prosecution, disciplinary proceedings, or obtaining protection from abuse orders related to the incident more difficult. If a victim chooses not to make a complaint regarding an incident, they nevertheless should consider speaking with Campus Safety or other law enforcement to preserve evidence in the event that the victim decides to report the incident to law enforcement or the College at a later date to assist in proving that the alleged criminal offense occurred or that may be helpful in obtaining a protection order.
Grinnell-in-London Campus

After an incident of sexual assault, dating violence or domestic violence, the victim should consider seeking medical attention as soon as possible at University College Hospital or St. Mary’s Hospital Paddington.

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 72 hours so that evidence may be preserved that may assist in proving that the alleged criminal offense occurred/or is occurring or may be helpful in obtaining a protection order. In circumstances of sexual assault, if victims do not opt for forensic evidence collection, health care providers can still treat injuries and take steps to address concerns of pregnancy and/or sexually transmitted infections. Victims of sexual assault, domestic violence, stalking, and dating violence are encouraged to also preserve evidence by saving text messages, instant messages, social networking pages, other communications, and keeping pictures, logs or other copies of documents, if they have any, that would be useful to College adjudicators/investigators or police.

As time passes, evidence may dissipate or become lost or unavailable, thereby making investigation, possible prosecution, disciplinary proceedings, or obtaining protection from abuse orders related to the incident more difficult. If a victim chooses not to make a complaint regarding an incident, they nevertheless should consider speaking with Campus Safety or other law enforcement who can help coordinate the preservation of evidence in the event that the victim decides to report the incident to law enforcement or the College at a later date to assist in proving that the alleged criminal offense occurred or that may be helpful in obtaining a protection order.

Law Enforcement Campus Authorities Involvement

Main Campus

Although the College strongly encourages all members of its community to report violations of this policy to law enforcement (including Campus Safety and/or local police), it is the victim’s choice whether or not to make such a report. Reports can be made to Campus Safety by calling (641) 269-4600 or by visiting the Department of Campus Safety at 1213 6th Avenue Street, Grinnell, Iowa, 50112. Furthermore, victims have the right to decline to notify law enforcement. However, Grinnell College’s Title IX Office or Department of Campus Safety will assist any victim with notifying law enforcement if the victim so desires. The Grinnell Police Department may also be reached directly by calling 911 (emergency) or (641) 236-2670 (non-emergency during regular business hours), in person at 1020 Spring Street, Grinnell, Iowa. Additional information can be found on the Grinnell Police Department website.

Conard Environmental Research Area (CERA)

Although the College strongly encourages all members of its community to report violations of this policy to law enforcement (including Campus Safety and/or local police), it is the victim’s choice whether or not to make such a report. Furthermore, victims have the right to decline to notify law enforcement. However, Grinnell College’s Title IX Office or Department of Campus Safety will assist any victim with notifying law enforcement if the victim so desires. The Jasper County Sheriff’s Office may also be reached directly by calling 911 (emergency) or (641) 792-5912 (non-emergency during regular business hours), in person at 2300 Law Center Drive,
Newton, Iowa. Additional information can be found on the Jasper County Sheriff's Office website.

**Grinnell-in-London Campus (GIL)**

Although the College strongly encourages all members of its community to report violations of this policy to law enforcement (including Campus Safety and/or local police), it is the victim’s choice whether or not to make such a report. Furthermore, victims have the right to decline to notify law enforcement. However, Grinnell College’s Title IX Office or IES Emergency Response will assist any victim with notifying law enforcement if the victim so desires. The London Metro Police may also be reached directly by calling 999 (emergency) or 101 (non-emergency). The local police station is the New Scotland Yard, which can be reached by calling 020 7230 1212 or at 8-10 Broadway, London SW1H 0BG. Additional information can be found on the London Metropolitan Police website.

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

If you have been the victim of domestic violence, dating violence, sexual assault, or stalking, you should report the incident promptly to the Title IX Coordinator by calling (641) 269-4999, writing titleix@grinnell.edu, or coming into the office located in Mears Cottage to report in person or Campus Safety (if the victim so desires.) Any reports of domestic violence, dating violence, sexual assault, or stalking made to Campus Safety will be referred to the Title IX Coordinator so that the College can fulfill its duties under Title IX to end the harassment, eliminate the hostile environment, prevent the harassment from recurring, and, as appropriate, remedy its effects.

**Procedures Grinnell College Will Follow When A Crime is Reported**

Grinnell College has procedures in place that serve to be sensitive to victims who report sexual assault, domestic violence, dating violence, and stalking, including informing individuals about their right to file criminal charges as well as the availability of counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance and other services on and/or off-campus, as well as additional remedies to prevent contact between a complainant and an accused party (respondent), such as housing, academic, transportation and working arrangements, if reasonably available. The College will make such arrangements, if the victim requests them and if they are reasonable available, regardless of whether the victim chooses to report the crime to the Department of Campus Safety or local law enforcement. Students, faculty and staff should contact the Deputy Title IX Coordinator by dialing (641) 269-4999, emailing titleix@grinnell.edu, or scheduling an appointment in the office at Mears Cottage for assistance with remedies.

When a report of dating violence is made to Grinnell College, the following procedures will be followed:

1. Institution will assess immediate safety needs of complainant.
2. Institution will assess the seriousness, persistence, and pervasiveness of the conduct.
3. Institution will assist complainant with contacting local police if complainant requests and complainant provided with contact information for local police department.
4. Institution will provide written instructions on how to apply for Protective Order.
5. Institution will provide written information to complainant on how to preserve evidence.
6. Institution will assess need to implement interim or long-term protective measures to protect the complainant, if appropriate.
7. Institution will provide the victim with a written explanation of the victim’s rights and options.
8. Institution will provide a “No Trespass” directive to accused party if deemed appropriate.

When a report of domestic violence is made to Grinnell College, the following procedures will be followed:

1. Institution will assess immediate safety needs of complainant.
2. Institution will assist complainant with contacting local police if complainant requests and complainant provided with contact information for local police department.
3. Institution will provide written instructions on how to apply for Protective Order.
4. Institution will assess the seriousness, persistence, and pervasiveness of the conduct.
5. Institution will provide written information to complainant on how to preserve evidence.
6. Institution will assess need to implement interim or long-term protective measures to protect the complainant, if appropriate.
7. Institution will provide the victim with a written explanation of the victim’s rights and options.
8. Institution will provide a “No Trespass” directive to accused party if deemed appropriate.

When a report of stalking is made to Grinnell College, the following procedures will be followed:

1. Institution will assess immediate safety needs of complainant.
2. Institution will assess the seriousness, persistence, and pervasiveness of the conduct.
3. Institution will assist complainant with contacting local police if complainant requests and provide the complainant with contact information for local police department.
4. Institution will provide written instructions on how to apply for Protective Order.
5. Institution will provide written information to complainant on how to preserve evidence.
6. Institution will assess need to implement interim or long-term protective measures to protect the complainant, if appropriate.
7. Institution will provide the victim with a written explanation of the victim’s rights and options.
8. Institution will provide a “No Trespass” directive to accused party if deemed appropriate.
When a report of a sexual assault is made to Grinnell College, the following procedures will be followed:

1. Depending on when reported (immediate vs delayed report), institution will provide complainant with access to medical care.
2. Institution will assess immediate safety needs of complainant.
3. Institution will assess the seriousness, persistence, and pervasiveness of the conduct.
4. Institution will assist complainant with contacting local police if complainant requests and provide the complainant with contact information for local police department.
5. Institution will provide complainant with referrals to on and off campus mental health providers.
6. Institution will assess need to implement interim or long-term protective measures, if appropriate.
7. Institution will provide the victim with a written explanation of the victim’s rights and options.
8. Institution will provide written instructions on how to apply for a Protective Order
9. Institution will provide a copy of the policy applicable to Sexual Assault to the complainant and inform the complainant regarding timeframes for inquiry, investigation and resolution.
10. Institution will inform the complainant of the outcome of the investigation, whether or not the accused will be administratively charged and what the outcome of the hearing is.
11. Institution will provide a “No Trespass” directive to accused party if deemed appropriate
12. Institution will enforce the anti-retaliation policy and take immediate and separate action against parties that retaliate against a person for complaining of sex-based discrimination or for assisting in the investigation.

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

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

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

Grinnell College complies with Iowa law in recognizing orders of protection. Any person who obtains an order of protection from Iowa, or any reciprocal state, should provide a copy to the Department of Campus Safety and the Office of the Title IX Coordinator. A complainant may then meet with the Title IX Coordinator and/or the Department of Campus Safety to develop a Safety Action Plan, which is a plan for Campus Safety and the victim to reduce risk of harm while on campus or coming and going from campus. This plan may include, but in not limited to: escorts, special parking arrangements, providing a temporary cell phone, changing classroom location or allowing a student to complete assignments from home, etc.) The College cannot apply for a legal order of protection, No Contact Order or restraining order on behalf of the victim, however, the College will help coordinate transportation and connection with advocate support for the victim to seek a civil protection order.

In Iowa, the complainant (victim) is required to apply for a protective order directly with the clerk of court in the area where they are seeking protection. Under the federal Violence Against Women Act, a facially valid out of state court order is to be enforced even if the holder of that order would not be eligible for protection under State law.

Grinnell College may issue a Notice of Trespass if deemed appropriate. An institutional No-Contact Order may be issued by the College or at the request of the complainant (victim) or respondent (accused). If the College receives a report that such an institutional No Contact Order has been violated, the College will initiate disciplinary proceedings appropriate to the status of the accused individual (student, employee, etc.) and will impose sanctions if the individual is found responsible for violating the No-Contact Order.

Accommodations and Protective Measures for Victims

Upon receipt of a report of domestic violence, dating violence, sexual assault or stalking, Grinnell College will provide written notification to the students and/or employees about the resources and options available to them. These options include protective measures and interim remedies including but not limited to: interim suspension, interim ban or leave, connection to law enforcement, no contact order, no trespass, assistance with protective orders, restricted access to certain facilities, and assistance with academic, living, transportation, and working situations. At the victim’s request, and to the extent of the victim’s cooperation and consent, the college will offer, if they are reasonably available, such protective measures and interim remedies regardless of whether the victim chooses to report the crime to Campus Safety or local law enforcement. Examples of options for a potential change to the academic situation may be to transfer to a different section of a class, withdraw and take a class at another time if there is no option for moving to a different section, etc. Potential changes to living situations may include moving to a different room or residence hall or moving onto campus from off campus. Possible changes to work situations may include changing working hours or location. Possible changes in transportation may include having the student or employee park in a different location or assisting the student or employee with a safety escort, etc.
To request protective measures or interim remedies, a victim should contact the Deputy Title IX Coordinator for Case Management by calling (641) 269-4999, writing titleix@grinnell.edu, or scheduling an appointment at the office located in Nollen House. The Deputy Title IX Coordinator will work with the victim (complainant) and various offices/departments on campus, on a need to know basis, to coordinate the implementation of the remedies.

**On and Off-Campus Services for Victims**

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

### On Campus Resources

<table>
<thead>
<tr>
<th>Type of Resource</th>
<th>Service Provider</th>
<th>Types of Services Available</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Resource</td>
<td>Title IX Coordinator, Bailey Asberry</td>
<td>The role of the Title IX Coordinator is to provide any individual who has experienced discrimination on the basis of sex with the available resources and options.</td>
<td>(641) 269-4999 <a href="mailto:titleix@grinnell.edu">titleix@grinnell.edu</a> Mears Cottage Main Campus, Grinnell</td>
</tr>
<tr>
<td>Counseling</td>
<td>Dean of Religious Life and Chaplain, Deanna Shorb</td>
<td>Confidential counselor</td>
<td>(641) 269-4981 <a href="mailto:shorb@grinnell.edu">shorb@grinnell.edu</a> 913 8th Avenue Main Campus, Grinnell</td>
</tr>
<tr>
<td>Counseling</td>
<td>Student Health and Wellness (SHAW)</td>
<td>Confidential resources which includes nurses, therapists and physicians.</td>
<td>(641) 269-3230 Forum, lower level Main Campus, Grinnell</td>
</tr>
<tr>
<td>Counseling</td>
<td>Grinnell College Ombuds, Chinyere Ukabiala</td>
<td>Confidential resource who will listen and inform, research issues to help generate options, and coach individuals on how to deal with difficult and sensitive situations.</td>
<td>(641) 269-9399 <a href="mailto:ukabiala@grinnell.edu">ukabiala@grinnell.edu</a> Joe Rosenfield ‘25 Center 311 Main Campus, Grinnell</td>
</tr>
<tr>
<td>Health</td>
<td>Director of Student Health and Wellness (SHAW), Kasey Herbers</td>
<td>Confidential resources which includes nurses, therapists and physicians.</td>
<td>(641) 269-3230 <a href="mailto:herberska@grinnell.edu">herberska@grinnell.edu</a> Forum, lower level Main Campus, Grinnell</td>
</tr>
<tr>
<td>Mental Health</td>
<td>Student Health and Wellness (SHAW)</td>
<td>Confidential resources which includes nurses, therapists and physicians.</td>
<td>(641) 269-3230 Forum, lower level Main Campus, Grinnell</td>
</tr>
<tr>
<td>Victim Advocacy</td>
<td>Grinnell Advocates</td>
<td>Confidential advocates who are students trained and certified in sexual assault and intimate partner violence advocacy.</td>
<td>(641) 260-1615 Available 24 hours OR Call Campus Safety (x4600) and ask for a Grinnell Advocate to contact you at your preferred phone number. Individuals are not required to disclose a name or any identifying information to Campus Safety in order to speak with a Grinnell Advocate.</td>
</tr>
<tr>
<td>Legal Assistance</td>
<td>N/A Grinnell College does not offer legal assistance.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Visa and Immigration Assistance</td>
<td>International students on Grinnell College Main campus: Associate Dean and Director of International Student Affairs, Karen Edwards</td>
<td>Will teach &quot;F&quot; and &quot;J&quot; students, scholars, and dependents about their legal rights and obligations to help them remain in lawful status. The Office of International Student Affairs staff are trained and certified as Designated School Officials (DSO) and Responsible Officers (RO)</td>
<td>(641) 269-3763 <a href="mailto:edwardsk@grinnell.edu">edwardsk@grinnell.edu</a> 1220 Park Street Humanities and Social Sciences Complex Main Campus, Grinnell</td>
</tr>
<tr>
<td>Visa and Immigration Assistance</td>
<td>U.S. Students seeking assistance while studying abroad: Director of Off Campus Study, Alicia Stanley</td>
<td>Off Campus Study staff can assist in connecting a student studying abroad to the appropriate resources in the country of study.</td>
<td>(641) 269-4640 <a href="mailto:stanleya@grinnell.edu">stanleya@grinnell.edu</a> 1220 Park Street Humanities and Social Sciences Complex Main Campus, Grinnell</td>
</tr>
<tr>
<td>Type of Resource</td>
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</tr>
<tr>
<td>Student Financial Aid</td>
<td>Financial Aid Office Brad Lindberg</td>
<td>Assistance with financial aid options.</td>
<td>(641) 269-3250 <a href="mailto:lin@grinnell.edu">lin@grinnell.edu</a></td>
</tr>
<tr>
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</tr>
<tr>
<td>Student Financial Aid</td>
<td>Financial Aid Office Revae Nelson</td>
<td>Assistance with financial aid options.</td>
<td>(641) 269-3250 <a href="mailto:nelsonr1@grinnell.edu">nelsonr1@grinnell.edu</a></td>
</tr>
<tr>
<td>Local Law Enforcement</td>
<td>Campus Safety</td>
<td>Campus Safety can connect you to the local police department, assist with general safety concerns and direct you to additional resources</td>
<td>(641) 269-4600 Available 24 hours 1213 6th Avenue Street Main Campus, Grinnell</td>
</tr>
<tr>
<td>Additional Faculty/Staff Resources</td>
<td>Dean of the College, Beronda Montgomery</td>
<td>The Dean of the College serves as the Senior Official in complaints where a Faculty member is named as a respondent</td>
<td>(641) 269-3100 Nollen House Main Campus, Grinnell</td>
</tr>
<tr>
<td>Additional Faculty/Staff Resources</td>
<td>Assistant Vice President of Human Resources, Mary Greiner</td>
<td>The Assistant Vice President of Human Resources serves as the Senior Official in a complaint where a staff member is named as a respondent</td>
<td>(641) 269-4818 Mears Cottage 1213 6th Avenue, Grinnell</td>
</tr>
</tbody>
</table>

**Off Campus Resources – Main Campus and Conard Environmental Research Area (CERA)**

<table>
<thead>
<tr>
<th>Type of Resource</th>
<th>Service Provider</th>
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<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Resource</td>
<td>Crisis Intervention Services</td>
<td>Local confidential resource</td>
<td>800-270-1620 24 hours</td>
</tr>
<tr>
<td></td>
<td>Intimate Partner Violence and Stalking</td>
<td>Confidential resource</td>
<td>800-464-8340 24 hours</td>
</tr>
<tr>
<td>Counseling</td>
<td>Employee Assistance Program</td>
<td>Confidential resource that aids employees in resolving personal problems (e.g., marital, financial or emotional problems; family issues; substance/alcohol abuse) that may be adversely affecting the employee’s performance.</td>
<td>800-327-4692 24 Hours</td>
</tr>
<tr>
<td>Health</td>
<td>Grinnell Regional Medical Center</td>
<td>Local hospital providing confidential services including HIV/AIDS and Sexually Transmitted Infections (STI) testing, medical exam, sexual assault exam (SANE Nurses are available on call), morning after pregnancy prevention. Thee exams do not obligate you to file criminal charges; evidence is stored by the police to preserve the chain of evidence.</td>
<td>(641) 238-2380 Emergency Room 24 hours 210 4th Avenue, Grinnell</td>
</tr>
<tr>
<td>Mental Health</td>
<td>Employee Assistance Program</td>
<td>Confidential resource that aids employees in resolving personal problems (e.g., marital, financial or emotional problems; family issues; substance/alcohol abuse) that may be adversely affecting the employee’s performance.</td>
<td>800-327-4692 24 Hours</td>
</tr>
<tr>
<td>Mental Health</td>
<td><strong>All students are first referred to Student Health and Counseling Services.</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Victim Advocacy</td>
<td>Crisis Intervention Services</td>
<td>Organization provides confidential support and advocacy to victims of domestic violence, sexual assault, stalking and related crimes in North Central Iowa.</td>
<td>(800) 270-1620 On-Call, 24 hours 500 High Ave West, Oskaola, IA 52577</td>
</tr>
<tr>
<td></td>
<td>Crisis Center and Women’s Shelter</td>
<td>The Crisis Center provides a 24 hour crisis line for support, empowerment, and referral information; short-term counseling, advocacy, and support; educational programs and outreach services.</td>
<td>(800) 464-8340 On-Call, 24 hours</td>
</tr>
<tr>
<td></td>
<td>L.U.N.A. Latino/a Resources</td>
<td>Sexual assault and domestic violence services for Latino population in Iowa</td>
<td>(866) 258-7668 On-Call, 24 hours 100 E Euclid Ave #153 Des Moines, IA 50313</td>
</tr>
<tr>
<td></td>
<td>Monsoon United Asian Women of Iowa</td>
<td>Monsoon United Asian Women of Iowa serves victims / survivors of domestic violence and sexual assault in Asian and Pacific Islander (API) communities in Iowa</td>
<td>(866) 881-4641 On-Call, 24 hours 4952 Franklin Avenue Des Moines, Iowa 50310</td>
</tr>
</tbody>
</table>
### Amani Community Services

Amani Community Services is a culturally specific domestic violence agency serving African Americans.

**Contact Information**

(319) 804-0741
On-Call, 24 hours
2315 Falls Ave, Suite 1 Waterloo, Iowa 50701

### Iowa Coalition Against Domestic Violence

ICADV can provide legal, housing assistance and connection to local resources such as an advocate, shelters, protection orders, etc.

**Contact Information**

(800) 770-1659 or text "iowahelp" to 20121

### Iowa Coalition Against Sexual Assault

This organization will provide technical assistance and training to member centers; civil legal assistance for survivors of sexual assault, including immigration assistance; improving responses to sexual assault within communities of color; a national project providing peer-based assistance to other sexual assault coalitions; statewide sexual assault prevention; training for allied professionals; and public policy efforts at the state and national level.

**Contact Information**

(515) 244-7424
3030 Merle Hay Road, Des Moines, IA 50310

### Iowa Coalition Against Domestic Violence

ICADV can provide legal, housing assistance and connection to local resources such as an advocate, shelters, protection orders, etc.

**Contact Information**

(800) 770-1659 or text "iowahelp" to 20121

### Iowa Coalition Against Sexual Assault

This organization will provide technical assistance and training to member centers; civil legal assistance for survivors of sexual assault, including immigration assistance; improving responses to sexual assault within communities of color; a national project providing peer-based assistance to other sexual assault coalitions; statewide sexual assault prevention; training for allied professionals; and public policy efforts at the state and national level.

**Contact Information**

(515) 244-7424
3030 Merle Hay Road, Des Moines, IA 50310

### Visa and Immigration Assistance

U.S. Students studying abroad should contact their respective program director in country.

International Students studying on Grinnell College campus may contact their home consulate.

**Contact Information**

IES Abroad
Non-Emergency
(800) 995-2300
Emergency
(800) 995-2300
After-Hours Emergencies
(800) 953-0171
www.USCIS.gov

### Student Financial Aid

Students can seek assistance first with Grinnell College’s Financial Aid Office and they will be referred on as needed.

**Contact Information**

Federal Student Aid
https://studentaid.ed.gov/sa/

### Local Law Enforcement

Safety and law enforcement assistance.

**Contact Information**

911
Emergency
24 hours
(641) 236-2670
Non-emergency
1020 Spring St, Grinnell, IA

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

- [Rape, Abuse and Incest National Network](https://www.rainn.org)
- [Department of Education, Office of Civil Rights](https://www2.ed.gov/)

### Off-Campus Resources – Grinnell-in-London (GIL)

<table>
<thead>
<tr>
<th>Type of Resource</th>
<th>Service Provider</th>
<th>Types of Services Available</th>
<th>Contact Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>General</td>
<td>IES Abroad, London</td>
<td></td>
<td>07801 514 547</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>24 hours</td>
</tr>
<tr>
<td>Victim Advocacy</td>
<td>East London Rape Crisis</td>
<td>Confidential resource</td>
<td>020 7683 1270</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>24 hours</td>
</tr>
<tr>
<td>Victim Advocacy</td>
<td>Solace Women’s Aid</td>
<td>Confidential resource</td>
<td>0808 802 5565</td>
</tr>
<tr>
<td>Victim Advocacy</td>
<td>Men’s Advice Line</td>
<td>Confidential resource for GBTQIA victims</td>
<td>0808 801 0327</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>M-F, 9am-5pm</td>
</tr>
<tr>
<td>Victim Advocacy</td>
<td>Burrell Street Clinic (NHS)</td>
<td>Confidential resource</td>
<td>020 7188 6666</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>Varied hours</td>
</tr>
<tr>
<td>Victim Advocacy</td>
<td>Southall Black Sister</td>
<td>Confidential resource for African American and Asian victims</td>
<td>0208 571 0800</td>
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<tr>
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<td>M,W,F, 9:30am-4:30pm</td>
</tr>
<tr>
<td>Health</td>
<td>St. Mary’s Hospital Praed Street London W2 (Paddington underground station)</td>
<td>Accident and Emergency Department for a serious need of mediate treatment but not in a genuine emergency requiring an ambulance.</td>
<td>202 3312 6666</td>
</tr>
<tr>
<td>Health</td>
<td>University College Hospital 235 Euston Road London WC1 (Euston Square underground station)</td>
<td>Accident and Emergency Department for a serious need of mediate treatment but not in a genuine emergency requiring an ambulance.</td>
<td>0845 1555 000</td>
</tr>
<tr>
<td>Type of Resource</td>
<td>Service Provider</td>
<td>Types of Services Available</td>
<td>Contact Information</td>
</tr>
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</tr>
<tr>
<td>Mental Health</td>
<td>International Students House</td>
<td>Free counseling advice</td>
<td><a href="mailto:advice@sh.org.uk">advice@sh.org.uk</a></td>
</tr>
<tr>
<td>Mental Health</td>
<td>London Nightline</td>
<td>Confidential listening, support and information service run during term-time by trained students for students</td>
<td>020 7631 0101 between 6pm-8am Term time only <a href="http://www.nightline.org.uk">www.nightline.org.uk</a></td>
</tr>
<tr>
<td>Mental Health</td>
<td>SANELINE</td>
<td>Mental health resources and support</td>
<td>0300 304 7000 6pm-11pm daily <a href="http://www.sane.org.uk">www.sane.org.uk</a></td>
</tr>
<tr>
<td>Legal Assistance</td>
<td>Rights of Women 52-54 Featherstone Street London EC1Y 8RT</td>
<td>Legal advice on family law, criminal law, immigration and asylum.</td>
<td>020 7251 6575 <a href="http://rightsofwomen.org.uk/">http://rightsofwomen.org.uk/</a></td>
</tr>
<tr>
<td>Visa and Immigration Assistance</td>
<td>Director, Grinnell in London (primary) IES Abroad (secondary)</td>
<td></td>
<td>Director of Grinnell in London Office 020 7813 3265 Emergency mobile 07754 182 389 IES Abroad Emergency (800) 995-2300 After-Hours Emergencies (800) 953-0171 <a href="http://www.USCIS.gov">www.USCIS.gov</a></td>
</tr>
<tr>
<td>Student Financial Aid</td>
<td>Students can seek assistance first with Grinnell College’s Financial Aid Office and they will be referred on as needed.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Local Law Enforcement</td>
<td>London Metro Police</td>
<td>Safety and law enforcement assistance</td>
<td>999 Emergency 24 hours 101 Non-emergency</td>
</tr>
</tbody>
</table>

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

- Department of Education, Office of Civil Rights

Confidentiality

Victims may request that directory information on file with the College be suppressed by request to the Registrar’s Office by calling (x3450) or (641) 269-3450.

Regardless of whether a victim has opted-out of allowing the College to share directory information, personally identifiable information about the victim and other necessary parties will be treated as confidential and only shared with persons who have a specific need-to-know, i.e., those who are investigating/adjudicating the report or those involved in providing support services to the parties, including protective measures and interim remedies.

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.

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

Adjudication of Violations
Grinnell College’s disciplinary process includes a prompt, fair, and impartial process from the initial investigation and through resolution process. In all instances, the process will be conducted in a manner that is consistent with the institution’s policy and that is transparent to the complainant and the respondent. Usually, the resolution of domestic violence, dating violence, sexual assault and stalking complaints are completed within 60 calendar days of the report. However, the resolutions process allows for extensions of timeframes for good cause with written notice to the complainant and the respondent of the delay and the reason for the delay. College officials involved in the investigation or adjudication of domestic violence, dating violence, sexual assault and stalking are trained annually on the issues related to domestic violence, dating violence, sexual assault, and stalking as well as how to conduct a fair and thorough investigation and adjudication process that protects the safety of the victim and promotes accountability. Furthermore, each policy provides that:

1. The complainant and the respondent will have timely notice for meetings at which the complainant and the respondent, may be present;
2. The complainant, the respondent and appropriate officials will have timely and equal access to any information that will be used during formal and informal disciplinary meeting and/or hearings;
3. The institutional disciplinary procedures will not be conducted by officials who have a conflict of interest or bias for or against the complainant or the respondent;
4. Complainants and Respondents have the opportunity to consult with and be accompanied by the support person (advisor) of their choice to any related meeting or proceeding under these procedures. The support person (advisor) may be any individual, including an attorney, who is not a witness or otherwise involved in the procedures under this policy. The support person (advisor) is a nonparticipating supporter at any meeting or hearing under this policy and procedures. The support person (advisor) may advise the Complainant or Respondent on the procedural or any other aspects of the matter or assist with the party’s review of documents and appeal process in a manner consistent with this policy. The support person (advisor) may not contact the other party or contact potential witnesses without express authority from the Title IX Coordinator or designee. A party may change their support person (advisor) at any point during the process. The College will not limit the choice of advisor or presence for either the complainant or the respondent in any meeting or institutional disciplinary proceeding. The College reserves the right to dismiss a support person (advisor) who is disruptive to College proceedings or does not abide by the restrictions set forth in this policy.
5. The complainant and the respondent will be notified simultaneously, in writing, of any initial, interim and/or final result of any disciplinary proceeding; and
6. Where an appeal is permitted under the applicable policy, the complainant and the respondent will be notified simultaneously in writing, of the procedures for the respondent and the victim to appeal the result of the institutional disciplinary proceeding. When an appeal is filed, the complainant and the respondent will be notified simultaneously in writing of any change to the result prior to the time that it becomes final as well as of the final result once the appeal is resolved.
Types of Disciplinary Proceedings

Whether or not criminal charges are filed, the College or a person may file a complaint under the following policies contained in the *Grinnell College Policy, Procedures and Guide to Preventing, Reporting, and Responding to Sexual Misconduct and Other Forms of Interpersonal Violence*, depending upon the status of the respondent (student or employee):

1. **How to File a Disciplinary Complaint Under this Policy**

   Generally speaking, the initial assessment and subsequent grievance procedures against a Respondent are overseen by an administrator designated as the Senior Official:
   - For reports against a student, the Senior Official is the Dean of Students.
   - For reports against a staff member, the Senior Official is the Assistant Vice President of Human Resources.
   - For reports against a faculty member, the Senior Official is the Dean of the College.

2. **How the College Determines Whether This Policy will be Used**

   At the conclusion of the Title IX assessment, the Senior Official (Dean of Students, Dean of the College, Assistant Vice President of Human Resources), in consultation with the Title IX Coordinator and the Title IX response team, will determine the appropriate manner of resolution. If the reported information would not support a policy violation, accepting all reported information as true, the College may decline to pursue an investigation. It is at the discretion of the College to determine which method of resolution is appropriate.*

   Some Complainants will choose to seek support resources without pursuing conduct (corrective) action. In all cases, Complainants who come forward will be afforded support, resources, and remedies, whether or not they choose to pursue campus conduct charges.

   In the course of the Title IX assessment, College officials, to the best of their ability, will consider the interest of the Complainant and their expressed preference for manner of resolution. Where possible, and as warranted by an assessment of the facts and circumstances, the College will seek action consistent with the Complainant’s request. Where a Complainant requests that their name or other identifiable information not be shared with the Respondent or that no formal action be taken, the College will balance this request with its dual obligation to provide a safe and non-discriminatory environment for all College community members and to afford a Respondent procedural protections by providing notice and an opportunity to respond before conduct (corrective) action is taken against a Respondent.

   In assessing the appropriate resolution, the College will consider the Complainant’s express preference for manner of resolution in light of the following factors:

   - The seriousness, persistence, or pervasiveness of the conduct;
   - The respective ages and roles of the Complainant and the Respondent;
• Whether there have been other reports of Prohibited Conduct against the Respondent;
• The Respondent’s right to receive information if such information is maintained in an “education record” under FERPA;
• The right of the Respondent to receive notice and relevant information before conduct (corrective) action is sought;
• Whether the circumstances suggest there is an increased risk of the Respondent committing additional acts of Prohibited Conduct;
• Whether the Respondent has a history of arrests or prior conduct violations (at the College or elsewhere, if such information is available) indicating a history of violence;
• Whether the Respondent threatened further acts of Prohibited Conduct or other violence against the Complainant or others;
• Whether the Prohibited Conduct was committed by multiple individuals;
• Whether the Prohibited Conduct was perpetrated with a weapon, by force, or through the use of predatory behavior, including the use of incapacitating substances;
• Whether the College possesses other means to obtain relevant evidence (e.g., security cameras or personnel, physical evidence); and
• The College’s obligation to provide a safe and non-discriminatory environment.**

*Complete policy is located in Chapter XI Responding to A Report: Initial Assessment and Interim Measures, Section A - Title IX Review and Assessment.
**Complete policy is located in Chapter XI Responding to A Report: Initial Assessment and Interim Measures, Section B – Complainant Agency and Autonomy

3. Steps in the Disciplinary Process

Informal Resolution encompasses a wide variety of actions that may be taken, in support of a Complainant’s request, to eliminate the Prohibited Conduct, prevent its recurrence, and address its effects. Informal Resolution does not involve disciplinary action against a Respondent.

Formal Resolution, which involves an investigation to determine if there has been a policy violation, may result in the imposition of sanctions through conduct (corrective) action. The decision whether to pursue Informal or Formal Resolution will be made by the Senior Official, in consultation with the Title IX Coordinator and the Title IX response team. There is no burden on the Complainant to affirmatively seek one form of resolution over another; to the contrary, it is always the College’s burden to determine the appropriate course of action in light of the known facts and circumstances.*

*Complete policy is located in Chapter XII Informal and Formal Resolution Options.
4. Anticipated Timeline

The College seeks to resolve all reports of Prohibited Conduct within 60 calendar days of the initial report. All time frames expressed in this policy can be extended for good cause, with written notice to the parties of the delay and the reason for the delay. Good cause may include the complexity of the allegations, the number of witnesses involved, the availability of the parties or witnesses, the effect of a concurrent criminal investigation, any intervening school break or vacation, or other unforeseen circumstances.

In general, a Complainant and Respondent can expect to receive timely updates as to the status of the review or investigation. In the event that the investigation and resolution exceed this time frame for good cause, the College will notify all parties of the need for additional time, and best efforts will be made to complete the process in a timely manner while balancing principles of thoroughness and fairness with promptness. *

*Complete policy is located in Chapter XI Responding to A Report: Initial Assessment and Interim Measures, Section B - Complainant Agency and Autonomy

5. Decision-Making Process

If the Respondent is a faculty member or staff member, the final investigative report will form the basis for the Senior Official or an outside adjudicator to make decisions and recommendations. The College will determine the appropriate adjudication process depending on the complexity and facts of the case. The report will include either a finding, by a preponderance of the evidence, of a violation of this policy and a recommendation regarding disciplinary action, or a finding of no violation of this policy. Any action taken against a faculty or staff member would be consistent with applicable employment contracts and faculty/staff handbook.*

If the Respondent is a student, the final investigation report will form the basis for adjudication by the Senior Official (Dean of Students), another College administrator serving as the Dean’s designee, or a trained individual external to the College (referred to interchangeably in this policy as the adjudicator). The adjudicator will determine responsibility by a preponderance of evidence – whether it is more likely than not that there was a violation of conduct standards or policy.** *Complete policy is located in Chapter XII Informal and Formal Resolution Options: Section C – Formal Resolution: Adjudication Process when Respondent is a Faculty or Staff Member

**Complete policy is located in Chapter XII Informal and Formal Resolution Options: Section D – Formal Resolution: Adjudication Process when Respondent is a Student

6. Standard of Evidence

After all of the information has been presented through these three adjudication meetings, the adjudicator will deliberate in private. While finding the facts in the case, the adjudicator must reach a decision on responsibility by using the preponderance of evidence. This means that the adjudicator will decide whether it is “more likely than not,” based upon the information provided through the investigation and at the adjudication meeting(s), that the
Respondent is responsible for the alleged violation(s). The decision on responsibility will be shared with the Complainant and the Respondent, simultaneously in writing.

The findings of the adjudicator will be documented in a case opinion within five (5) business days of completion of meetings. The findings will detail the findings of fact and the basis/rationale for the decision of the adjudicator, making reference to the evidence that led to the finding. *

*Complete policy is located in Chapter XII Informal and Formal Resolution Options: Section D – Formal Resolution: Adjudication Process when Respondent is a Student, 9

7. Possible Sanctions/Outcomes

The possible sanctions that may be imposed on a student include are conduct warning, probation, suspension, dismissal, restitution fines, deferred finding of responsibility, behavioral expectations, (including a campus no-contact order), parental and guardian notification, College-owned residence suspension, College-owned residence dismissal, withholding of registration or degree, and rehabilitative measures.

Outcomes related to a staff or faculty member may include: a verbal or written warning, additional training, formal notation to personnel file, suspension with or without pay, and termination/dismissal for cause.

8. Range of Protective Measures and Interim Remedies Available to a Victim Alleging Misconduct

Reasonably available interim measures will be implemented at the discretion of the Title IX Coordinator. Potential remedies and accommodations that may be applied to the Complainant and/or the Respondent include:

- Coordinating access to medical or counseling services and assistance in setting up initial appointments, both on and off campus;
- Imposition of campus No-Contact Order or No Trespass Order
- Assistance in obtaining a civil protection order
- Facilitating a meeting with law enforcement to discuss safety planning and law enforcement options
- Rescheduling of exams and assignments (students)
- Providing alternative course completion options (students)
- A change in class schedule or transferring sections, including the ability to drop a course without penalty (students)
- A change in work schedule or job assignment
- A change of office or workspace
- A change in student’s College-owned residence (students)
• Assistance from College staff in completing residence relocation (students)
• Limiting an individual or organization’s access to certain College facilities or activities pending resolution of the matter
• A voluntary leave of absence (students)
• Providing an escort to ensure safe movement between classes, work and other activities (students)
• Providing academic support services, such as tutoring (students)
• An interim restriction on residence hall access pending the outcome of a conduct proceeding (students)
• An interim suspension or ban pending the outcome of a conduct proceeding (students)
• Assistance in resolving concerns about immigration status, visas or financial aid
• Any other remedy which can be tailored to the involved individuals to achieve the goals of this policy

College Initiated Protective Measures
In addition to those protective measures previously described, the Title IX Coordinator or their designee will determine whether interim remedies and protective measure should be implemented, and, if so, take steps to implement those protective measures as soon as possible. Examples of interim protective measures include, but are not limited to: a Grinnell College No-Contact Order, residence hall relocation and/or restriction, adjustment of course schedules, a leave of absence, or reassignment to a different supervisor or position. These remedies may be applied to one, both, or multiple parties involved. Violations of the Title IX Coordinator’s directives and/or protective measures may lead to additional disciplinary action. Protective measures imposed may be temporary pending the results of an investigation or may become permanent as determined by Grinnell College.

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

Sex Offender Registration
The federal Campus Crimes Prevention Act (section 1601 of Public Law 106-386), in effect on October 28, 2000, requires institutions of higher education to issue a statement advising the campus community where law enforcement information provided by the state concerning registered sex offenders may be obtained. The act also requires sex offenders already required
to register in a state to provide notice of each institution of higher education in that state at which the person is employed, carries a vocation, or is a student.

The Dru Sjodin National Sex Offender Public Website (NSOPW) is coordinated by the U.S. Department of Justice. The site is a cooperative effort between jurisdictions hosting public sex offender registries and the federal government.

Main Campus and Conard Environmental Research Area (CERA)
In the State of Iowa, convicted sex offenders must register with the sheriff in the county in which they reside; and, if the person attends or works for an institution of higher education they must register with the sheriff in the county in which the institution is located.

The campus community can access information for registered sex offenders in the state of Iowa on the Iowa Sex Offender Registry. This information is provided by the state under chapter 692A Code of Iowa, and in compliance with section 121 of the Adam Walsh Child Protection and Safety Act of 2006 (42 U.S.C. 16921).

Grinnell-in-London (GIL)
The campus community can access information for registered sex offenders in the United Kingdom on the UK & Ireland Database.

URLS:

Conduct Processes
http://catalog.grinnell.edu/content.php?catoid=12&navoid=2535

College Policies
https://secure.grinnell.edu/policies

Emergency Procedures
http://www.grinnell.edu/campus-life/safety/procedures

Ethicspoint

Faculty Handbook

Policies and Procedures Regarding Sexual Respect
https://secure.grinnell.edu/campus-life/sexual-respect/policies?group=30355

Staff Handbook
https://grinco.sharepoint.com/offices/hr/HRToolsandResources/Staff%20Handbook.pdf
Student Handbook
http://catalog.grinnell.edu/index.php?catoid=12

Sex Offender Registries
Iowa Sex Offender Registry: http://www.iowasexoffender.com/
National Sex Offender Public Website: https://www.nsopw.gov/
The UK & Ireland Database: https://theukdatabase.com/.
Annual Campus Fire Safety Report - 2021

Introduction
Each year, the College is required by law to prepare, publish, and distribute an Annual Fire Safety Report with security-related policies and statistics related to fires in on-campus student housing facilities.

Grinnell College only operates on-campus student housing on its main campus location; therefore, the policy statements and statistics are only relative to that campus location.

Policies Related to Fire Safety Measures

Portable Electrical Appliances
Electrical appliances that are not permitted in the residence halls include but are not limited to: electric blankets, cooking and heating equipment, heat lamps, halogen lamps, kegerators, deep freezers, evaporative coolers, space heaters (with the exception of those provided by Facilities Management in heating emergencies) and window air conditioners. If these items are found, the College reserves the right to confiscate them due to electrical and fire safety concerns. Standard household microwaves under 1000 watts are permitted, and small refrigerators under 4.6 cubic feet are also permitted.

Students needing air conditioning for a medical accommodation must submit documentation of said medical condition through the Office of Disability Resources and Assistive Technology. If approved, the student would be pre-placed in an air-conditioned residence hall (or the student could opt to purchase their own stand-alone air-conditioning unit, which would be installed by Facilities Management). If a student is approved for air conditioning after the deadline has passed, space in an air-conditioned residence hall cannot be guaranteed. In that case, a student would be permitted to purchase their own stand-alone air-conditioning unit, and Facilities Management must install the unit. When an unapproved air-conditioning unit is discovered, Facilities Management will remove the air conditioner and the student will be billed $50.

Smoking and Open Flames
Effective July 1, 2008 the Iowa Smokefree Air Act prohibits smoking anywhere on the entire Grinnell College campus (including CERA). The law imposes penalties for noncompliance on both the smoker and the institution in the event of a violation. Effective September 1, 2014, Grinnell College will treat e-cigarettes in the same way as traditional cigarettes, for the purposes of complying with the Iowa Smokefree Air Act of 2008.

Smoking (including cigarettes, hookah, e-cigarettes, marijuana, or any other combustibles) is prohibited on all campus property. Instances of open flames, candles and incense are also prohibited in residence halls and in College-owned houses. Buildings, loggias, residence hall rooms, parking lots, vehicles owned by Grinnell College, interior sidewalks, and athletic fields are included in the ban. Persons who choose to smoke on Grinnell's campus do so at their own risk. Any violation of the College's smoking policy that leads to a fire alarm and/or building
evacuation is also subject to a $500 fine. Smoking is only permitted on perimeter sidewalks and streets.

**Campus Fire Reporting & Evacuation Procedures**

If a fire occurs in a campus building, everyone should quickly exit the building using available stairways and fire escapes. After reaching safety, call the Department of Campus Safety at extension 4600, (641) 269-4600, or dial 911 for assistance by the Grinnell Fire Department. Identify yourself and give the location of the fire.

The emergency signal is a continuous sounding of the fire alarm. In case of a fire, each person in the residence hall should leave the building as quickly as possible, using available stairways and fire escapes. Each student should also leave the room door unlocked, and close the door upon exiting their room. Students should exit the residence halls by walking quietly and quickly and stand in a designated area away from the building. Awaken any sleeping roommate or suitemates. Prepare to evacuate by putting on shoes and coat if necessary. Feel the doorknob and the door. If they are hot, do not open the door. If they are cool, open slowly, if heat or heavy smoke rushes in, close the door immediately and remain inside. Resident life staff members who are present on their floors should facilitate the evacuation of their floor/section if possible.

When the alarm sounds shout (Example: there is an emergency in the building leave by the nearest exit) and knock on doors as they make their way to the nearest exit and out the building. When exiting in smoky conditions keep your hand on the wall and crawl to the nearest exit. Always know more than one path out of your location and the number of doors between your room and the exit.

Students are not allowed to walk on fire escapes or the roofs of College buildings (including loggias) except during drills or a fire emergency. Students found in the residence hall after a fire alarm has sounded may face disciplinary action. If requested, accompany and assist persons with disabilities who appear to need assistance.

**Emergency Reporting Locations**

Department of Campus Safety (641) 269-4600

Grinnell Fire Department 911

Per Federal law, Grinnell College is required to annually disclose statistical data on all fires that occur in on-campus student housing facilities. Listed below are the non-emergency numbers to call to report fires that have already been extinguished in on-campus student housing. These are fires that you are not sure if they have been reported to the Department of Campus Safety. If you find evidence of such a fire or if you hear about such a fire, please contact one of the following non-emergency reporting locations.

**Non-Emergency Reporting Locations**

Department of Campus Safety (641) 269-4600

Facilities Management (641) 269-3300

When calling, please provide as much information as possible about the location, date, time and cause of the fire.
Fire Safety Education and Training Programs
Grinnell College holds community values sessions with all first-year students concerning topics of general fire safety and housing policies related to fire safety. Placards are also place near the entrances of residential facilities to help students familiarize themselves of the procedures in case a fire occurs. There are currently no programs for faculty and staff concerning fire safety.

Fire Response Actions

General Response
- If you can help control the fire without personal danger, take action with available firefighting equipment. If not, leave the area.
- A local alarm station will cause the alarm to sound. It does not automatically notify the Fire Department, but does notify the Department of Campus Safety.
- Never allow the fire to come between you and an exit.
- Remove all persons from the danger area.
- Close doors behind you to confine the fire.

Audible Fire Alarm Response
- If the audible alarm sounds for more than 30 seconds, or starts to sound for a second time, evacuate the building immediately.
- Do not use the elevators.
- If requested, accompany and assist persons with disabilities who appear to need assistance.
- Leave all parcels and personal property inside.
- Remain away from the exits to help facilitate clear access to the building for the Fire Department.
- Return to the building only when instructed to do so by Campus Safety, the police, or fire department officials.

Student Housing Facility Fire Safety Systems (Residence Halls)

<table>
<thead>
<tr>
<th>Residential Facilities</th>
<th>Fire Alarm Monitoring Done On Site</th>
<th>Partial Sprinkler System</th>
<th>Full Sprinkler System</th>
<th>Smoke Detection</th>
<th>Fire Extinguisher Devices</th>
<th>Evacuation Plans/Placards</th>
<th>Number of Evacuation (fire) drills 2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clark Hall</td>
<td>Yes</td>
<td>Yes</td>
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<td>Yes</td>
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<tr>
<td>1410 Park Street</td>
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<td>Cleveland Hall</td>
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<tr>
<td>1125 East Street</td>
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</tbody>
</table>

4 Partial Sprinkler System is defined as having sprinklers in the common areas only.

5 Full Sprinkler system is defined as having sprinklers in both the common areas and individual rooms.
<table>
<thead>
<tr>
<th>Building Name</th>
<th>Fire Alarm Monitoring</th>
<th>Partial* Sprinkler System</th>
<th>Full† Sprinkler System</th>
<th>Smoke Detection</th>
<th>Fire Extinguisher Devices</th>
<th>Evacuation Plans/Placards</th>
<th>Number of Evacuation (fire) drills 2021</th>
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<tr>
<td>Cowles Hall</td>
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<td>Gates Hall</td>
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<td>Haines Hall</td>
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<td>James Hall</td>
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<tr>
<td>Kershaw Hall</td>
<td>Yes</td>
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<td>Langan Hall</td>
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<td>Lazier Hall</td>
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<td>Loose Hall</td>
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<td>Main Hall</td>
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<td>Smith Hall</td>
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<tr>
<td>Younker Hall</td>
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Student Housing Facility Fire Safety Systems (Residential Houses)

<table>
<thead>
<tr>
<th>Residential Facilities</th>
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<th>Partial* Sprinkler System</th>
<th>Full† Sprinkler System</th>
<th>Smoke Detection</th>
<th>Fire Extinguisher Devices</th>
<th>Evacuation Plans/Placards</th>
<th>Number of Evacuation (fire) drills 2021</th>
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</thead>
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<tr>
<td>Black Cultural Center 1003 10th Avenue</td>
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<td>Yes</td>
<td>Yes</td>
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6 Partial Sprinkler System is defined as having sprinklers in the common areas only.

7 Full Sprinkler system is defined as having sprinklers in both the common areas and individual rooms.
<table>
<thead>
<tr>
<th>Plans for Future Improvements</th>
<th></th>
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<tbody>
<tr>
<td>Alumni Recitation Hall and Carnegie are still on track for new fire and sprinkler systems as part of the new Humanities and Social Sciences Complex (HSSC). Younker Hall was upgraded in the fall of 2018 from a non-intelligent panel to an intelligent fire panel. In addition, there are plans to renovate an existing office building into a new residential housing facility. Renovations will include upgrades to the fire system. All fire system changes mentioned above will be tied into our Johnson Control System for central monitoring. These improvements are scheduled barring any unforeseen circumstances that would hinder their implementation.</td>
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<table>
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<tr>
<th>Statistics for On-Campus Student Housing Facilities</th>
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<td>Statistics concerning the on-campus student residential facilities are listed below for the most recent calendar year for which data is available.</td>
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Fire Statistics

2019

Statistics and Related Information Regarding Fires in Residential Facilities

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<tr>
<th>Residential Facilities</th>
<th>Total Fires in Each Building</th>
<th>Fire Number</th>
<th>Cause of Fire</th>
<th>Number of Injuries that required Treatment in a Medical Facility</th>
<th>Number of Deaths Related to Fire</th>
<th>Value of Property Damage Caused by Fire (values are in U.S. dollars)</th>
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### 2020 Statistics and Related Information Regarding Fires in Residential Facilities

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## 2021

### Statistics and Related Information Regarding Fires in Residential Facilities

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