

# Annual Security Report

## VCUarts Qatar Campus



# 2024



# VCU notice of nondiscrimination, equal opportunity and affirmative action

Virginia Commonwealth University does not discriminate in admissions, treatment, employment or access to its programs or activities on the basis of race, color, religion, national origin (including ethnicity), age, sex (including pregnancy, childbirth and related medical conditions), parenting status, marital status, political affiliation, military status (including veteran status), genetic information (including family medical history), sexual orientation, gender identity, gender expression, or disability, as required by Title IX of the Education Amendments of 1972; the Americans with Disabilities Act of 1990, as amended; Section 504 of the Rehabilitation Act of 1973; Titles VI and VII of the Civil Rights Act of 1964; the Genetic Information Nondiscrimination Act of 2008; the Virginia Human Rights Act; the Virginia Personnel Act; and other state or federal laws and university policies. VCU prohibits sexual harassment and sex-based misconduct, including sexual assault and other forms of interpersonal violence. VCU also prohibits discrimination against employees or applicants for employment because they have inquired about, discussed or disclosed their own pay or the pay of another employee or applicant.

As an affirmative action and equal opportunity employer, VCU promotes the full realization of employment opportunity for all persons, including minorities, women, individuals with disabilities and veterans. VCU bases all employment decisions only on job requirements. These efforts apply to all employment actions, including but not limited to recruitment, selection, hiring, promotion, and compensation.

VCU promotes equal access to its owned and controlled facilities, and to educational and employment opportunities for qualified individuals with disabilities in compliance with the Americans with Disabilities Act of 1990, as amended, and Section 504 of the Rehabilitation Act of 1973, as well as other applicable state and local laws and university policy. Qualified individuals with disabilities are protected from discrimination, including harassment, and are entitled to reasonable accommodations to enable their participation in and enjoyment of all university programs, services, and activities.

**The following person has been designated to handle inquiries regarding accessibility policies, the ADA, Sections 503 and 504, and related statutes and regulations:**

Katy Washington,  
Chief Accessibility Officer  
Grace Street Center, 2nd Floor, 912  
W. Grace Street, Box 842549  
Virginia Commonwealth University  
Richmond, VA 23284,  
(804) 828-1347  
[ADAservices@vcu.edu](mailto:ADAservices@vcu.edu)

**The following person has been designated to handle inquiries regarding nondiscrimination policies:**

Kimberly Cain, Director of EEO and  
Affirmative Action Programs.  
Equity and Access Services  
Grace Street Center, 2nd Floor, 912  
W. Grace Street,  
Box 843022,  
Virginia Commonwealth University,  
Richmond, VA 23284,  
(804) 828-1347,  
[equity@vcu.edu](mailto:equity@vcu.edu)

**The following person has been designated to handle inquiries regarding Title IX and sex-based misconduct policies and to serve as the overall coordinator for purposes of Title IX compliance:**

Elizabeth Scott-Francis, Ed.D.  
Coordinator, Equity and  
Access Services  
Grace Street Center, 2nd Floor, 912  
W. Grace Street, Box 843022,  
Virginia Commonwealth University  
Richmond, VA 23284,  
(804) 828-1347  
[titleix@vcu.edu](mailto:titleix@vcu.edu)

Inquiries about the application of Title IX to VCU may be referred to the Title IX Coordinator at [titleix@vcu.edu](mailto:titleix@vcu.edu) or to the [Department of Education Office for Civil Rights](#).

Complaints of discrimination, harassment and retaliation may be directed to Equity and Access Services at [equity@vcu.edu](mailto:equity@vcu.edu). Complaints may also be filed with the [Department of Education Office for Civil Rights](#), [Equal Employment Opportunity Commission](#), [Commonwealth of Virginia Office of Civil Rights](#) and the [Department of Human Resource Management](#).

To view the complete notice, visit: <https://vcu.public.doctract.com>.



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# From the president

Dear VCU Community:

Virginia Commonwealth University is dedicated to upholding the values of a community of care, in which all who live, work, learn and heal here can be, and feel, as safe as possible. I am grateful for the many members of our community who advance an environment of civility, professionalism and respect.

The Annual Security and Fire Safety Report, produced by the VCU Police Department, is an important source of information for our entire community. It highlights initiatives and resources to promote and ensure safety for everyone. I sincerely appreciate VCU Police Chief John Venuti and his colleagues who present this critical information in a transparent way, and I hope this report will be useful to you as you advance the work of our university.

Thank you for your continued commitment to the safety and security of all in our community.

Sincerely,

Michael Rao  
VCU President



## Report preparation and disclosure of crime statistics

This report contains information and crime statistics for the VCUarts Qatar campus for the three previous calendar years. This report also contains information regarding campus security and personal safety topics, such as crime prevention, crime reporting policies, student conduct procedures and other information related to safety and security on the VCUarts Qatar campus.

The preparation of the VCUarts Qatar Annual Security Report is coordinated by Audit and Compliance Services in collaboration the VCU Police, the Health Promotion and Well-Being Center, Office of Human Resources, the Division of Student Affairs, Division of University Relations, Institutional Equity, Effectiveness and Success, and VCUarts Qatar staff, in accordance with the Jeanne Clery Disclosure of Campus Crime Statistics Act.

Information contained in this report can also be accessed at [www.police.vcu.edu/facts/](http://www.police.vcu.edu/facts/). All policies referenced in this document are effective as of June 1, 2024, and apply to all VCU campuses to the extent consistent with applicable federal and state law. To view all university policies, please visit <https://policy.vcu.edu>.

## Disclosure of Crime Statistics

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (20 USC §1092(f)) requires higher-education institutions across the United States to disclose information about crimes that occurred on Clery-reportable geography. Each year, VCU Police obtains content updates and Clery-reportable crime and referral data from VCUarts Qatar's Safety and Risk Management, VCU's Office of Student Conduct and Academic Integrity, Institutional Equity, Effectiveness and Success, and other designated university campus security authorities (as defined by federal law) for inclusion in this annual report.

For purposes of the Clery Act, the crime statistics disclosed in the table located at the end of this report include incidents that occurred on or within the following Clery defined geographic categories: (1) On Campus (Defined as property that VCU owned or controlled); (2) Noncampus (Defined as a building or property owned or controlled by VCU that is not reasonably contiguous to the main campus, which is used in direct relation to or support of the university's educational purposes and is frequented by students; or property owned or controlled by a student organization



that is officially recognized by VCU); and (3) Public (Defined as property within, or immediately adjacent to, and accessible from the VCUarts Qatar campus).

### **Clery-Reportable Crime Definitions**

**Murder and 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:** The penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.

**Fondling:** The touching of the private 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 their age or because of their temporary or permanent mental incapacity.

**Incest:** Non-forcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

**Statutory Rape:** Non-forcible sexual intercourse with a person who is under the statutory age of consent.

**Robbery:** The taking or attempting to take

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 an aggravated assault when a gun, knife or other weapon is used, which could and probably would 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, safe-cracking and all attempts to commit any of the aforementioned.

**Motor Vehicle Theft:** The theft or attempted theft of a motor vehicle. (This includes all cases where automobiles are taken by persons not having lawful access, even if the vehicles are later abandoned-including joyriding.)

**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, personal property of another, etc.

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

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

**Weapons Law Violations (Carrying, Possessing, Etc.):** The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment or use of firearms, cutting instruments, explosives, incendiary devices or other deadly weapons.

**Referred for campus disciplinary action (Liquor Laws, Drug Abuse and Weapons Violations):** The referral of any person to any campus official who initiates a disciplinary action for which a record is maintained and may result in the imposition of a sanction.

**Dating Violence:** Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship and the frequency of interaction between the persons involved in the relationship. Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. It does not include acts covered under the definition of domestic violence.

**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 cohabitated 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 in which the crime of violence occurred, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

**Stalking:** Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for the person's safety or the safety of others, or to suffer substantial emotional distress. For the purpose of this definition "course of conduct" means two or more acts,

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

**Hate crime:** A crime reported to local police agencies or to a campus security authority that manifests evidence that the victim was intentionally selected because of the perpetrator's bias against the victim. For the purposes of this section, the categories of bias include the victim's actual or perceived race, religion, gender, gender identity, sexual orientation, ethnicity, national origin and disability. Pursuant to the Clery Act, the crimes of Larceny-Theft, Simple Assault, Intimidation, or Destruction/Damage/Vandalism of Property, as well as the aforementioned crime categories, are also reported under Clery Act requirements as a hate crime if it is determined the victim was intentionally selected because of the perpetrator's bias against the victim. Hate crimes are reported for each of the Clery geographic categories: On Campus, Noncampus, and Public property. Clery defined geographic categories are further discussed on page 6.

**Clery-reportable Hate Crime bias categories include the following:**

- **Race:** A preformed negative attitude toward a group of persons who possess common physical characteristics, e.g., color of skin, eyes, and/or hair; facial features, etc., genetically transmitted by descent and heredity which distinguish them as a distinct division of humankind, e.g., Asians, blacks or African Americans, whites.
- **Religion:** A preformed negative opinion or attitude toward a group of persons who share the same religious beliefs regarding the origin and purpose of the universe and the existence or nonexistence of a supreme being, e.g., Catholics, Jews, Protestants, atheists.
- **Sexual Orientation:** A preformed negative opinion or attitude toward a group of persons based on their actual or perceived sexual orientation. Sexual Orientation is the term for a person's physical, romantic and/or emotional attraction to members of the same and/or opposite sex, including lesbian, gay, bisexual and heterosexual (straight) individuals.
- **Gender:** A preformed negative opinion or attitude toward a person or group of persons based on their actual or perceived gender, e.g., male or female.



- **Gender Identity:** A preformed negative opinion or attitude toward a person or group of persons based on their actual or perceived gender identity, e.g., bias against transgender or gender non-conforming individuals.
- **Ethnicity:** A preformed negative opinion or attitude toward a group of people whose members identify with each other, through a common heritage, often consisting of a common language, common culture (often including a shared religion) and/or ideology that stresses common ancestry.
- **National Origin:** A preformed negative opinion or attitude toward a group of people based on their actual or perceived country of birth.
- **Disability:** A preformed negative opinion or attitude toward a group of persons based on their physical or mental impairments, whether such disability is temporary or permanent, congenital or acquired by heredity, accident, injury, advanced age or illness.
- **Larceny-Theft (Except Motor Vehicle Theft):** The unlawful taking, carrying, leading or riding away of property from the possession or constructive possession of another, including attempted larcenies. Embezzlement, confidence games, forgery, worthless checks, etc., are excluded.
- **Simple Assault:** An unlawful physical attack by one person upon another where neither the offender displays a weapon nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration or loss of consciousness.
- **Intimidation:** To unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack.
- **Destruction/Damage/Vandalism of Property:** To willfully or maliciously destroy, damage, deface or otherwise injure real or personal property without the consent of the owner or the person having custody or control of it.

**The following crimes in addition to the other aforementioned Clery-reportable crime categories are included within the Clery Act requirements for Hate Crime reporting if it is determined that the victim was intentionally selected because of the perpetrator's bias against the victim:**

## VCUarts Qatar Education City, Doha, Qatar

### Campus profile

VCUarts Qatar is the Qatar campus of the Virginia Commonwealth University School of the Arts. Established in 1998 through a partnership with Qatar Foundation for Education, Science and Community Development, VCUarts Qatar offers students the opportunity to earn a Bachelor of Fine Arts degree in graphic design, interior design and painting and printmaking; a Bachelor of Arts degree in art history; and a Master of Fine Arts degree in design.

Located in Doha, the capital city of Qatar, VCUarts Qatar is fully accredited by the National Association of Schools of Art and Design, the Southern Association of Colleges and Schools and the Council for Interior Design Accreditation. The current student body represents a diverse range of nationalities with students coming from 34 different countries.

VCUarts Qatar was the first campus established in Education City, a unique 2,500-acre campus community. The university has since been joined by Weill Cornell Medical College, Texas A&M University, Georgetown University School of Foreign Service, Carnegie-Mellon University, Northwestern University, and HEC Paris.

In 2010, VCUarts Qatar more than doubled its facilities through a major expansion project. The expansion has allowed for

the integration of the university's undergraduate and graduate programs under one roof, the connection of the research and entrepreneurship offices with curricular programs, and the expansion of our technical spaces to support all forms of visualization and research with a media lab, digital fabrication lab, printmaking studios, photography studio, an expanded library and the first materials library in the region.

VCUarts Qatar strives to provide an engaged, learner-centered environment that fosters inquiry, discovery and innovation in a global setting. The university hosts the biennial international art and design conference Tasmeem Doha and the biennial Hamad bin Khalifa Symposium on Islamic Art, attracting globally recognized designers, artists and academics while fostering sustainable, university-community partnerships that enhance the educational, economic and cultural vitality of Qatar.

VCUarts Qatar has substantial involvement with the emerging design industries in Qatar and is a significant catalyst for that growth. It has established itself as a center of excellence for education and research in art and design.

Graduates are pursuing successful careers within the government, nonprofit and private industries in Qatar and around the world. Many of our graduates have gone on to establish their own businesses, thereby

contributing to the development of the small and medium enterprise culture in Qatar.

For more information, refer to <https://www.qatar.vcu.edu>.

### **How VCUarts Qatar protects you**

VCUarts Qatar works in concert with the Qatar Foundation, Qatar Foundation-contracted security, Qatar Civil Defense and police services. Any event requiring interaction with these organizations is tracked by VCUarts Qatar's Safety and Risk Management Department. All follow-up findings are documented and archived. The partner universities also maintain a working group, the Hazard, Vulnerability, Assessment and Planning forum (HVAP). This group meets on a regular basis and during times of heightened awareness, as required. HVAP also maintains a shared dedicated webpage for all group members.

Additionally, should an event warrant a notification, the VCUarts Qatar Safety and Risk Department will work with the Communications Department and notify the community using the VCUQAlerts email address and multiple official university social media platforms.

The VCUarts Qatar Safety and Risk Department provides due diligence and duty of care in the evaluation of local and international travel for the community through consultation with the third-party contracted provider Global Rescue (<https://www.globalrescue.com>).

### **Enforcement authority of campus security**

Qatar Foundation (QF) City Operations is responsible for campus security and works closely with VCUarts Qatar to coordinate staffing, events security and VIP security needs through QF Security staff and a third-party contractor. QF Security and contractor staff are not sworn officers and do not have police powers. However, they work closely with Qatari law enforcement and act as a liaison for the VCUarts Qatar community when investigating alleged criminal offenses that may have occurred on the Education City Campus.

Headquartered at Central Plant 2, the campus security force is open 24 hours a day. The reporting of incidents or emergencies can be made to any contracted security guard at the VCUarts Qatar building, any contracted security guard closest to the incident on Education City, or by calling (+974) 4454-0999.

### **Crime prevention and security awareness programs and resources**

During the onboarding process, the Human Resources Department hosts a new employee orientation throughout the year, in which a presentation is given by the VCUarts Qatar's Safety and Risk Department. This presentation provides an overview of security policies and procedures for VCUarts Qatar's building operations, Qatar Foundation safety and security protocols, and a brief introduction



to Qatari laws which may differ from the home country of the new employee. The new employee is also provided with a variety of handouts for future reference; within this packet, they also receive the VCUarts Qatar Employee Preparedness Guide. Employees are encouraged to reach out to the Safety and Risk Management Department through private consultations and with any questions they may have during their employment. Employees are also made aware that VCUarts Qatar Human Resources collaborates closely, and in a confidential manner, with the Safety and Risk Department to assist in resolving matters relating to personal safety and security incidents of employees as necessary.

New students are made aware of VCUarts Qatar's safety and security programs through a session provided once during orientation at the beginning of each fall semester; this continues throughout the student's time with VCUarts Qatar in close collaboration with the Safety and Risk Department and the Division of Student Affairs. VCUarts Qatar's Personal Development and Counseling Services Department also offers counseling services and private sessions to discuss personal health and wellness related matters, including drug and substance abuse, sexual harassment, crime prevention and personal safety.

## **Things you can do**

### **If someone tries to harm you**

- Stay calm and think rationally
- Remember what the attacker looks like
- Consider what you can do to defend yourself

### **At home**

- Always lock your doors and windows
- Be careful when inviting casual acquaintances into your home or office
- Do not allow anyone to duplicate your keys

### **On the phone**

- List only first initials and last name in directories
- Do not divulge your name and address to people you don't know
- Hang up immediately on obscene phone callers
- Never reveal that you are alone
- Note the date and time and what was said during the call for future reporting

### **In your car**

- Lock your doors and windows
- Park in well-lit areas
- Store valuables out of sight and lock them in the trunk when the car is parked
- If your car breaks down, activate emergency flashers



- Stay in the locked car
- Immediately call for assistance; if someone stops to help, ask the person to call for help for you
- Sound the horn if threatened
- Never pick up hitchhikers

#### **If you live off campus**

- Have the landlord re-key locks when moving into a previously rented residence or after keys have been lost or stolen
- Install deadbolt locks on all exterior doors and locks on windows
- Make sure shrubbery is trimmed away from entryways and windows
- Light entrances all night long

#### **Important numbers**

- Qatari Emergency Services, off campus: 999
- QF Emergency and Ambulance Services on campus: (+974) 4454-0999
- Andrea Cecetka, director of safety and risk management, VCUarts Qatar  
Office: (+974) 4402-0668  
Mobile: (+974) 3025-1232
- Matthew Nelson Ed.D, Interim Assistant Dean for Student Affairs and Director of Student Life and Engagement Office:

Office: (+974) 4402-0636  
Mobile: (+974) 6699-0294  
QF Primary Care Clinic  
(+974) 4454-1244

- VCUarts Qatar Security Control Room  
(+974) 4402-0769
- Archana Kumar, director of human resources, VCUarts Qatar  
Office: (+974) 4402-0546  
Mobile: (+974) 3013-3505
- Global Rescue Emergency Response  
Travel Services: (+1) 617-459-4200

#### **Reporting criminal incidents and other emergencies**

All VCUarts Qatar community members and guests are encouraged to promptly and accurately report emergencies, such as criminal incidents, accidents and suspicious circumstances to the nearest campus security officer or by calling (+974) 4454-0999, or to local Qatari law enforcement by dialing 999. Reporting of crimes and emergencies is highly encouraged, including when the victim of a crime elects not to or is unable to make such a report.

To further encourage the timely reporting of crimes on campus, the following persons have been designated as campus security officials to whom incidents may also be reported:



- Andrea Cecetka, director of safety and risk management, VCUarts Qatar  
Office: (+974) 4402-0668  
Mobile: (+974) 3025-123
- Matthew Nelson Ed.D,  
Interim Assistant Dean for Student Affairs and Director of Student Life and Engagement Office:  
Office: (+974) 4402-0636  
Mobile: (+974) 6699-0294
- Archana Kumar, director of human resources, VCUarts Qatar  
Office: (+974) 4402-0546
- Discrimination Incident Reporting Form  
[https://cm.maxient.com/reportingform.php?VirginiaCommonwealthUniv&layout\\_id=9](https://cm.maxient.com/reportingform.php?VirginiaCommonwealthUniv&layout_id=9)
- VCU Helpline  
<https://app.convercent.com/en-us/LandingPage/7487d231-9b3c-e611-8105-000d3ab03673>

## **Voluntary, confidential reporting and anonymous reporting procedures**

There are no VCU policies that allow voluntary confidential reporting due to state open-record laws in Virginia. However, an individual may elect to report a crime anonymously by withholding their name and contacting a designated campus security official listed above. However, if it becomes necessary for Qatari law enforcement involvement, rules of the host country must be followed. To report a crime anonymously, please call (+974) 4454-0999 (emergency) or (+974) 3013-3450.

All students, faculty, staff and guests are encouraged to accurately and promptly report crimes or emergencies to the Director of Safety and Risk Management or to student affairs for inclusion of these reported crimes in the annual disclosure of crime statistics for the institution. If sufficient information is disclosed, anonymous reports are counted and included in the university's annual crime statistics, which do not include any personally identifiable information.

## **Reporting a crime or emergency to the local police**

To report an off-campus emergency to local Qatari officials, dial 999. Follow the operator's directions and provide as much information as possible.

VCUarts Qatar has officially recognized student organizations; however, based on the information known to VCU, there



are no Clery-defined noncampus locations owned or controlled by a student organization officially recognized by VCUarts Qatar. Therefore, VCUarts Qatar does not monitor or record through local police agencies any criminal activity involving students engaged at off-campus locations that do not fall within Clery-defined geography.

### **Response to reports**

QF Security will respond to the scene of an incident once informed; they may also contact Qatari emergency services if they feel a response is necessary. Once the community member is identified as belonging to VCUarts, QF Security will inform the dedicated focal point within the Safety and Risk Department. If the community member is an employee, Human Resources will then be informed by the Safety and Risk Management Department. If the community member is a student, then the Assistant Dean for Student Affairs will be contacted as appropriate.

### **Daily crime log**

QF Security maintains a daily crime log for the Education City campus, to include the VCUarts Qatar building. The log includes the nature, date, time and general location of criminal incidents, as well as the disposition of the complaint, if that is known at the time the log is created. The log is updated within two business days of the reporting of the information to the QF Security. A business day is Sunday through Thursday except for days when the university is closed.

### **Access to and security of campus facilities**

VCUarts Qatar building access rules are in place for the safety and security of the community and follow QF Security protocols for the Education City Campus. Details of building access control procedures can be found in the VCUarts Qatar Building Access Control Policy maintained by the Safety and Risk Department. The policy also contains a matrix which has been approved by each Partner University and QF Security. Should the need arise to change building access procedures due to a large event on campus or a recognized threat, access may be restricted to Education City buildings and in a uniform manner across the campus. Reduced access has also occurred when the QF Stadium hosts major events. The community is informed of these changes through the Communications Department VCUQalert email address and official university social media platforms.

All VCUarts Qatar employees and students are provided an ID card which identifies the issuing building on the campus (in our case, a VCUarts Qatar identifying ID card). Access is only granted through the main entrance by swiping the card reader with an issued ID or by showing a form of identification (Qatari ID or passport) and signing into the facility. ID cards from other Partner Universities and the Qatar Foundation are honored for building entry as long as these card holders also sign-in at the main entrance. Visitors are required to show either a Qatari ID or passport and

sign-in at the main entrance and given an ID badge which must be worn during their entire visit.

The contracted security force regularly conducts rounds to ensure that all other ground floor access doors are locked and secure. Should an emergency occur within the building, all ground floor entry/exit doors automatically unlock once the fire alarm is activated.

### **Maintenance of campus facilities**

Facilities and landscaping are maintained in a manner to minimize hazardous conditions. The maintenance of the campus is the responsibility of the Qatar Foundation Facilities Directorate. The Qatar Foundation Health, Safety and Environment Directorate reports to the Facilities Directorate, in writing, conditions that could be hazardous. Additionally, lighting is monitored by Qatar Foundation City Operations security personnel; any lights that may not be working are also reported to the Mechanical and Electrical Department. Problems reported by visitors, students, faculty, staff and custodians are sent to Qatar Foundation Health, Safety and Environment Department for action.

### **Timely warning/crime alert policy and procedures**

The timely warning/crime alert is triggered when the VCUarts Qatar Safety and Risk Management Director, in conjunction with QF Security and Clery

officers at other partner universities located on the Education City campus, identifies a Clery Act-reportable crime that occurs on Clery Act geography that poses a serious or continuing threat to students, faculty, employees and/or guests. Clery Act geography includes: (i) buildings and property that are part of VCUarts Qatar campus, (ii) the institution's noncampus buildings and property; and (iii) public property within or immediately adjacent to and accessible from the campus. See Clery-Reportable Crime Definitions on pages 6-9. The decision to inform the community shall be based on the facts of the incident known to the VCUarts Qatar director of safety and risk, QF Security, and/or Clery officers from partner universities in Education City. The timely warnings/crime alerts are intended to provide an opportunity for individuals to take reasonable precautions for their safety.

VCUarts Qatar considers any reportable incident occurring within Education City as potentially reportable under the timely warning/crime alert doctrine. A determination will be made in coordination with QF Security and Clery officers at partner universities on the Education City campus, and in consultation with the Dean of VCUarts Qatar and the Communications Department. Incidents which prompt a timely warning/crime alert notification include, but are not limited to:

- Murder/non-negligent manslaughter
- Manslaughter by negligence

- Sexual assault
- Robbery
- Aggravated assault
- Arson

## Notification process

Upon confirmation that a timely warning/crime alert is necessary, the director of safety and risk will inform the available Crisis Management Team Executive Policy Group members (led by the dean) of the incident. VCUarts Qatar's Executive Policy Group members include the dean, the associate dean, the associate dean of academic affairs, the associate dean for research, the assistant dean for enrollment and registration services, the assistant dean for student affairs, the director of strategic engagement, and the director of communications. The alert message will be developed using templates that are agreed upon by the Communications Departments for each partner university located on the Education City campus and QF Security. The Communications Department for the partner university who owns or controls the property in Education City where the reported incident occurred will take the lead in developing the specific details for the alert message, and will consult with the Clery officers for the other partner universities and QF Security in order to finalize the content of the alert message. In order to maintain confidentiality, all timely warnings/crime alerts will be provided without the names of victims. The timely warning/ crime alert will include as much of the following information as is known at the time of the alert:

- Nature of the incident or immediate threat
- Location, date and time of the incident
- Description of any suspect(s)
- Recommend action for the VCUarts Qatar community
- Crime prevention information
- Contact number for follow-up inquiries

Anyone with information warranting a timely warning/crime alert should report the circumstances to the QF Security desk, (+974) 4454-0999, or in person to Command Post 2, North Campus.

## Methods of notification

These timely warnings/crime alerts will be issued through a posting to VCUarts Qatar email distribution lists. In addition, as warranted by the circumstances, the VCUarts Qatar mass notification system will be activated. The system will notify the VCUarts Qatar community via email and the SMS system. During an emergency situation, the SMS feature can be used to issue short, detailed instructions to the community for individuals to follow (e.g., shelter in place and do not leave the building).

## Emergency notification, response and evacuation policy

In accordance with the VCUarts Qatar Emergency Management program policies, VCUarts Qatar Crisis Management Team (CMT) will coordinate the emergency



notification, response and evacuation of the VCUarts Qatar building.

The CMT is comprised of two groups: (1) the CMT Executive Policy Group, and (2) the CMT Implementation Group. The Executive Policy Group makes top-tier policy decisions and provides direction to the Implementation Group through consultation with the Implementation Group Facilitator (appointed at the direction of the dean). The Executive Policy Group does not direct on-scene operations and will only directly manage the Implementation Group or the Emergency Operations Center (EOC), when activated, after consulting with the Implementation Group Facilitator. Upon learning of an emergency incident, any member of the CMT may suggest activation of the EOC via the VCUarts Qatar Emergency WhatsApp group. The dean, or their designee, will authorize the activation of the EOC; the Communications Department will then inform CMT members of the official activation and relay any urgent details. When the EOC is activated (either virtually or physically), the EOC serves as the central location for coordination and decision-making in support of a response to an emergency incident. Members of the CMT Implementation Group make up the core personnel of the EOC, and any or all of the members of the CMT Executive Policy Group may join the CMT Implementation Group in the EOC. The CMT Implementation Group Facilitator acts as the EOC facilitator and will describe the nature of the incident

to the group which was communicated from the scene. In extreme cases, an evacuation from the State of Qatar may also be coordinated with input from VCU's Incident Coordination Team (ICT) and Global Rescue.

### **Notification process**

Emergencies on VCUarts Qatar's campus and Education City are confirmed by the CMT, in consultation with QF proprietary and contract security providers, to include QF Security. Activation of the emergency notification system will occur immediately upon confirmation of a significant emergency or dangerous situation at VCUarts Qatar's Education City campus involving an immediate or ongoing threat to the health and safety of the students, faculty and staff, so they may take reasonable precautions for their safety. The dean and the director of communications and/or their designee are the only members authorized to release university statements about the crisis to the VCUarts Qatar community or the public.

VCUarts Qatar will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency. The decision to activate the emergency notification system is made by the dean

of VCUarts Qatar, in consultation with the director of safety and risk management and the Crisis Management Team Executive Policy Group. If an emergency notification is deemed necessary for an incident that occurred on VCUarts Qatar property, the message will be developed by the Communications Department based on templates agreed upon with partner universities on Education City. If the incident originated on property owned or controlled by another partner university in Education City, VCUarts Qatar will consult with partner universities and QF Security to develop the contents of the emergency notification message.

### Methods of notification

VCUarts Qatar has a variety of methods to notify and provide emergency notifications, not only while students and faculty are on premises, but while they are off campus. A mass notification system allows notification to a wide range of electronic and social media. These can include, but are not limited to:

- VCUarts Qatar email via [VCUQalert@vcu.edu](mailto:VCUQalert@vcu.edu)
- Multiple private email accounts (opt in)
- SMS, number of record
- Multiple phones (opt in)
- Facebook (opt in)
- Twitter (opt in)

When activated, the mass notification system will always notify all students, faculty and staff at VCUarts Qatar. Follow-up

information will be communicated by VCUarts Qatar mass email, SMS, and/or other applicable method, as information becomes available and prudent to communicate.

The Qatar Foundation is responsible for disseminating emergency information to the larger community. Qatar Foundation Security and partner universities on the Education City campus will be informed of any emergency notification that is authored by VCUarts Qatar, so that everyone on campus stays informed. This will be done through the office of the VCUarts Qatar Dean, or as designated by the Dean.

### Emergency evacuation procedures

The VCUarts Qatar Safety and Risk Management Department, with assistance from the VCUarts Qatar Fire Wardens and QF contracted security staff, will be responsible for the safe evacuation of the VCUarts Qatar building as much as possible until Qatari emergency services respond to the incident. At the sound of a fire alarm or if you are instructed to evacuate, leave your work area or classroom, immediately 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 Qatar Foundation Emergency Response at (+974) 4454-0999 or Civil Defense (999).

- Remain calm.
- Do not use the lift; use the stairs.

- Assist the physically impaired; emergency wheelchairs are strategically located on the first and second floors; if the person is not ambulatory, make sure they are in a safe place and notify responding emergency services of the person's location.
- Move to the designated assembly area.
- Keep all walkways clear for emergency vehicles.
- Fire wardens and security will make sure the buildings are clear if it is safe to do so.
- Do not re-enter the building until the Qatar Foundation Emergency Response Team or Qatari Civil Defense advises it is safe to do so.

### **Training, testing and exercise procedures**

The VCUarts Qatar CMT, in coordination with the QF Emergency Response Team, will test the emergency response and evacuation procedures at least annually. The emergency response and evacuation procedures are publicized in conjunction with at least one test per calendar year. The QF Emergency Response Team holds annual Fire Warden training for VCUarts Qatar volunteer wardens. They also conduct an annual fire safety inspection of the building, and two unannounced fire drills per year in coordination with the Safety and Risk Management Department. After action reports from both the fire and safety inspection and fire drills are authored by the QF

Emergency Response Team and shared with the VCUarts Qatar Safety and Risk Management Department.

### **Alcohol and other drugs policy and available resources**

All members of the VCUarts Qatar community are expected to fulfill their obligations and responsibilities pursuant to university policy, as well as the laws of the State of Qatar. The VCU Alcohol and Other Drugs policy can be found at <https://vcu.public.doctract.com>.

### **Alcohol policy**

Faculty, staff and students at VCUarts Qatar are expected to be acquainted with, and abide by, all applicable laws and university regulations regarding alcohol and drugs, and to be aware of the social, physiological and psychological consequences of excessive drinking in order to make responsible and informed decisions about the serving and consumption of alcohol. Alcohol consumption is heavily regulated in the State of Qatar and forbidden to all Muslims. There also are strict laws that must be followed with respect to the possession, use and sale of alcoholic beverages by non-Muslims and these requirements are administered by the State of Qatar. All members of the VCUarts Qatar community are expected to follow these requirements in order to obtain a permit that allows alcoholic beverages to be purchased from State of Qatar authorized vendors.

### **Substance use education**

Currently, there are no formal substance use education programs offered at VCUarts Qatar. VCU has a collegiate recovery program, Rams in Recovery, to support individuals in recovery from substance use disorders. Email [recovery@vcu.edu](mailto:recovery@vcu.edu) for additional information on available resources and education

VCUarts Qatar Employee Assistance Program partner, ICA, is also available to discuss substance use education. They can be contacted at [youriscamena@icasworld.com](mailto:youriscamena@icasworld.com), 00-8000-100-250.

### **University's response to sexual assault, domestic violence, dating violence and stalking**

VCU does not discriminate in admissions, treatment, employment or access to its programs or activities on the basis of sex. VCU prohibits sexual harassment and sex-based misconduct, including sexual assault and other forms of interpersonal violence and reaffirms its commitment to maintain a campus environment emphasizing the dignity and worth of all members of the university community. VCU issues this statement of policy to inform the community of our comprehensive plan addressing sexual harassment and sex-based misconduct, educational programs and procedures that address sexual assault, domestic violence, dating violence and stalking, whether the incident occurs

on or off campus and when it is reported to a university official. The university has developed two policies that address sexual harassment and sex-based misconduct: (1) Title IX Sexual Harassment - Interim policy and (2) the Sex-Based Misconduct - Interim policy. These policies can be found in VCU's policy library and are interrelated and must be read together.

All members of the university community are encouraged to take every measure available to eliminate sexual assault, dating and domestic violence, and stalking on this campus. In addition to campus educational efforts, peer influence will be central to protecting members of the community from all forms of assault. Any student aware of a sexual assault on the campus is encouraged to immediately contact the assistant dean for student affairs. Sexual assault is prohibited by the State of Qatar and is an egregious violation of university community standards. In addition to potential criminal prosecution, VCUarts Qatar community members found in violation of expectations regarding sexual assault may be removed from the university community. Dating and domestic violence and stalking are not specifically addressed by the State of Qatar; however, any VCUarts Qatar community members found in violation of expectations regarding these actions may be subject to local prosecution based on the local definition of collateral law as enumerated in the State of Qatar criminal



code. See the [Qatar Law section](#) for a translation of Qatar law as it relates to domestic abuse, sexual abuse and harassment committed by computer.

### **Education and prevention programs**

Within the Division of Student Affairs, the Personal Development and Counseling Services Department is the primary provider of sexual violence, dating and domestic violence, and stalking education and prevention on campus. Sessions on the prevention of these actions for the entire campus community are available upon request. Additionally, programs about Consent and Sexual Assault and Harassment policies are offered yearly to new students at the beginning of the fall semester. To schedule a program, contact the office at [vcuqpdcs@vcu.edu](mailto:vcuqpdcs@vcu.edu).

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

- Identifies domestic violence, dating violence, sexual assault and stalking as prohibited conduct
- Provides definitions used by both the Department of Education, Qatar law for what behavior constitutes domestic violence, dating violence, sexual assault and stalking

- Defines what behavior and actions constitute consent to sexual activity using the definition of consent found in VCU's Title IX Sexual Harassment Policy or the Sex-Based Misconduct Policy
- Provides a description of safe and positive options for bystander intervention

### **How to be an active bystander**

Bystanders play a critical role in the prevention of sexual and relationship violence. They are "individuals who observe violence or witness the conditions that perpetuate violence. They are not directly involved but have the choice to intervene, speak up, or do something about it."<sup>1</sup> We want to promote a culture of community accountability where bystanders are actively engaged in the prevention of violence without causing further harm. We may not always know what to do even if we want to help. Below is a list<sup>2</sup> of some ways to be an active bystander. If you or someone else is in immediate danger, dial 999 (the emergency contact number countrywide for criminal and emergency reporting). This could be when a person is yelling at or being physically abusive toward another, and it is not safe for you to interrupt.

1. Watch out for your friends and fellow students/employees. If you see someone who looks like they

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

<sup>2</sup> Bystander intervention strategies adapted from Stanford University's Office of Sexual Assault & Relationship Abuse

could be in trouble or need help, ask if they are OK.

2. Confront people who seclude, hit on, try to make out with, or have sex with people who are incapacitated.
3. Speak up when someone discusses plans to take sexual advantage of another person.
4. Believe someone who discloses sexual assault, abusive behavior, or experience with stalking.
5. Refer people to on- or off-campus resources listed in this document for support in health, counseling, or with legal assistance.

#### Risk reduction

With no intent to victim blame and in recognizing that only rapists are responsible for rape, the following are some strategies to reduce one's risk of sexual assault or harassment (taken from Rape, Abuse and Incest National Network, [www.rainn.org](http://www.rainn.org)).

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. Avoid being 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. If you feel unsafe in any situation, go with your gut. If you see something suspicious, contact law enforcement immediately.
11. 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 them to a safe place immediately.
12. If you suspect you or a friend has been drugged, contact law enforcement immediately. Be explicit with doctors so they can give you the correct tests (you will need a urine test and possibly others).

13. 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 makes you feel comfortable.
    - 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.
  14. 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?
  15. If you drink, drink responsibly: eat a full meal before going out, have a glass of water between each drink, stick to one type of alcoholic beverage, know your limits and don't go beyond them, have a designated driver, and don't let anyone else make the decision of how much you will drink.
  16. Listen carefully. Take time to hear what the other person has to say. If you feel they are not being direct or are giving you a "mixed message," ask for clarification.
  17. Don't make assumptions about a person's behavior. Don't assume that someone wants to have sex because of they way they are dressed, they drink (or drink too much), or agree to go to your room. Don't assume that if someone has had sex with you before, they are willing to do so again. Also, don't assume that if your partner consents to kissing or other sexual activities, they are consenting to all sexual activities. Obtain clear consent for each sexual activity.
  18. Be careful in group situations; resist pressure from friends to participate in violent acts.
- Remember that even if you follow any, all, or none of the above, an assault can still occur. It is not your fault and you are not alone.

## Definitions

There are numerous terms used by VCU in our policy and procedures. The terms sexual assault, domestic violence, dating violence

and stalking are at times defined differently by university policy, the commonwealth of Virginia, the Department of Education and the Federal Bureau of Investigation. The State of Qatar does not specifically define these terms. Since students and employees reporting sexual misconduct have access to institutional administrative processes for reporting and complaint resolution, as well as on and off campus criminal complaint reporting and resolution, VCU is providing definitions to assist our community in understanding how we classify sexual misconduct at VCU. For questions regarding the definitions provided below, all persons are welcome to contact VCU's Title IX coordinator or the assistant dean for student affairs, among others, to learn more.

### **Affirmative consent**

Voluntary expression of willingness, permission or agreement to engage in specific sexual activity. Consent must be clear and communicated by mutually understandable words or actions which a reasonable person would interpret as a willingness to participate in mutually agreed-upon sexual acts. Silence, passivity or lack of resistance do not imply consent, and relying solely on non-verbal communications may result in a violation of the policy. It is important not to make assumptions about whether a sexual partner is consenting. If confusion or ambiguity arises during sexual activity, it is essential that each participant stop and verbally clarify the other's willingness to continue.

Prior consent does not imply consent to future sexual acts; even in the context of a prior or current relationship. Consent to one form of sexual activity does not automatically imply consent to other forms of sexual activity. Consent is often given with certain explicit or implied boundaries, such as agreeing to have sexual intercourse, but only with the use of a condom. Violating boundaries of consent by engaging in behavior beyond that which was agreed is non-consensual conduct.

A person who is in a state of incapacitation or whose agreement was made by force or threat of force cannot consent to sexual activity. The use of alcohol and/or drugs by the person initiating sexual activity is not an excuse for failing to obtain consent.

Consent can be withdrawn at any time during a sexual encounter. An individual who seeks to withdraw consent must communicate, through clear words or actions, that they no longer wish to engage in sexual activity. Once consent is withdrawn, the sexual activity must stop immediately.

The person who initiates a sexual act is responsible for obtaining consent for that act. Consent may be ratified by word or action at some point during the sexual encounter or thereafter, but clear communication from the outset is strongly encouraged. When there is a dispute as to whether a specific sexual activity was consensual, the university will assess whether the person initiating the sexual activity, knew, or should have known, that the



sexual activity was not consensual. Proof of consent or non-consent is not a burden placed on either party in an investigation and resolution under the policy. Instead, the burden remains on the university to determine whether the policy was violated.

### **Incapacitation**

The state in which a person's perception or judgment is so impaired that they lack the cognitive capacity to make or act on conscious decisions, and, specifically, that a person lacks the ability to make an informed and rational decision about whether or not to engage in sexual activity. A person who is incapacitated is unable, temporarily or permanently, to give affirmative consent because they are mentally or physically helpless, asleep, unconscious or unaware that sexual activity is taking place. A person may be incapacitated as a result of the consumption of alcohol or other drugs, or due to a temporary or permanent physical or mental health condition. A person who is incapacitated cannot give affirmative consent even if they appear to be a willing participant to the sexual activity.

Incapacitation may result from the use of alcohol and/or other drugs; however, consumption of alcohol or other drugs or intoxication alone are insufficient to establish incapacitation. Incapacitation is a state beyond drunkenness or intoxication. In addition, an alcohol-induced "blackout" is not necessarily indicative of incapacitation. An alcohol-induced blackout is defined as amnesia for the events of any

part of a drinking episode without loss of consciousness. It is characterized by memory impairment during intoxication in the relative absence of other skill deficits. It is not to be confused with "passing out." Given that individuals are conscious and can appear unimpaired during an alcohol-induced blackout, an incapacitation analysis requires evaluation of other observed signs of impairment.

The impact of alcohol and other drugs varies from person to person. It is often difficult to tell when someone has moved from being intoxicated to incapacitated. A person who themselves is under the influence of alcohol or other drugs may have difficulty assessing whether someone has progressed from intoxication to incapacitation. If there is any question or doubt as to the level or extent of a potential sexual partner's intoxication or impairment, the best course of action is to forgo or cease any sexual activity.

Although every individual may manifest signs of incapacitation differently, typical signs or indications that a person is incapacitated or may be approaching incapacitation include, but are not limited to:

- Slurred or incomprehensible speech
- Difficulty walking or standing
- Trouble keeping eyes open
- Combateness or emotional volatility
- Confusion or lack of understanding
- Disorientation to place, time, events and/or location
- Vomiting

- Incontinence
- Intermittent consciousness

When evaluating affirmative consent in cases of alleged incapacitation, incapacitation can only be found when the person initiating the sexual activity knew or reasonably should have known that the other party was incapacitated when viewed from the position of a sober, reasonable person.

### **Force**

The use of physical violence, threats, intimidation and/or coercion to cause or make a person engage in an activity that they would not have otherwise agreed to or did not want to engage in. The presence of force during sexual activity can negate indications of consent.

### **Physical Violence**

When a person exerts control over another person through the use of physical force. Examples of physical violence include hitting, punching, slapping, kicking, restraining, choking, strangulation and brandishing or using any weapon.

### **Threats**

Words or actions that would compel a reasonable person to engage in unwanted activity. Examples include threats to harm a person physically, to reveal private information to harm a person's reputation or to cause a person academic or economic harm.

### **Intimidation**

An implied threat that menaces or causes reasonable fear in another person. A person's size, alone, does not constitute intimidation; however, a person can use their size or physical power in a manner that constitutes intimidation (for example, by blocking access to an exit). Intimidation can also occur when a person uses their real or perceived power, authority or control to pressure another person to submit to sexual activity or other unwanted conduct that they might not have agreed to engage in otherwise.

### **Coercion**

An unreasonable amount of pressure to compel a person to take an action, make a choice or allow an act to happen that they would otherwise not choose or to which they would not give consent. Coercion is more than an effort to persuade, entice or attract another person to have sex. When a person makes clear that they do not want to participate in a particular form of sexual activity, that they want to stop or that they do not want to go beyond a certain sexual interaction, continued pressure can be coercive. In evaluating whether coercion was used, the frequency of the application of the pressure, the intensity of the pressure, the degree of isolation of the person being pressured and the duration of the pressure are all relevant factors.

### **Prohibited conduct**

In accordance with its prohibition against sex discrimination, including sexual assault,

domestic violence, dating violence and stalking, VCU's Title IX Sexual Harassment (Title IX) and Sex-Based Misconduct (University) Policies define the following as prohibited conduct:

### **Sexual Assault**

An offense classified as a forcible or non-forcible sex offense under the Uniform Crime Reporting (UCR) system of the Federal Bureau of Investigation (FBI). A forcible sex offense is any sexual act directed against another person, without the consent of the complainant, including instances in which the complainant is incapable of giving consent. Rape and fondling are both forcible sex offenses. A nonforcible sex offense is unlawful, nonforcible sexual intercourse, specifically, incest and statutory rape.

The FBI's UCR system further defines the following:

- Rape as the penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.
- Fondling is defined as the touching of the private parts of another person for the purposes of sexual gratification, without the consent of the victim, including instances in which the victim is incapable of giving consent because of their age or because of their temporary or permanent mental incapacity.
- Incest is defined as nonforcible sexual

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

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

### **Dating Violence**

Physical or sexual violence (or threats thereof) committed by a person who is or has been in a social relationship of a romantic or intimate nature with the complainant. The existence of such a relationship will be determined based on the complainant's statement and with consideration of the length of the relationship, the type of the relationship, and the frequency of the interaction between the person involved in the relationship. Dating violence does not include acts covered under the definition of domestic violence.

### **Domestic Violence**

Physical or sexual violence (or threats thereof) committed by: (i) a current or former spouse or intimate partner of the complainant; (ii) a person with whom the complainant shares a child in common; (iii) a person who is cohabitating with, or who has cohabitated with, the complainant as a spouse or intimate partner; (iv) a person similarly situated to a spouse of the complainant under the domestic or family violence laws of Virginia; or (v) any other person against an adult or youth complainant who is protected from that

person's acts under the domestic or family laws of Virginia. Individuals are not covered within the scope of this definition solely by virtue of their status as a roommate or former roommate in university housing or as a co-tenant or former co-tenant in an off-campus residence shared with other students.

### Stalking

Engaging in a course of conduct, on the basis of sex, 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 purpose of this definition:

- "Course of conduct" means two or more acts, including, but not limited to, acts in which the respondent 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 complainant
- "Substantial emotional distress" means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling

### Sexual Harassment (Title IX)

For the purpose of Title IX and this policy, sexual harassment is conduct on the basis of sex that satisfies one or more of the following:

- An employee conditioning the provision of an aid, benefit, or service of the university on an individual's participation in unwelcome sexual conduct;
- Unwelcome conduct determined by a reasonable person to be so severe, pervasive and objectively offensive that it effectively denies a person equal access to the university's education programs or activities; and/or,
- Sexual assault, dating violence, domestic violence or stalking.

Whether conduct is unwelcome is subjective and determined by the complainant's statements. Severity, pervasiveness and objective offensiveness are evaluated based on the totality of the circumstances from the perspective of a reasonable person in the same or similar circumstances, including the context in which the alleged conduct occurred and any similar, previous patterns of conduct.

Sexual harassment can occur by or against an individual of any sex, sexual orientation, gender identity, or gender expression. Sexual harassment can include things such as jokes, slurs, epithets, name-calling, threats, intimidation, ridicule, mockery, insults, put-downs, unwanted touching, offensive objects or pictures or other offensive conduct.



**Sexual Harassment (University)**

Conduct on the basis of sex that satisfies one or more of the following:

- Unwelcome verbal or physical conduct that is sufficiently severe, persistent or pervasive and objectively offensive that it unreasonably interferes with, denies, or limits an individual's ability to participate in or benefit from the university's education programs and activities or the individual's employment;
- Unwelcome sexual advance, request for sexual favors, or other unwanted conduct of a sexual nature by an individual not employed by the university in which submission to or rejection of such conduct is either an explicit or implicit term or condition of an individual's employment or advancement in employment, academic work or advancement in an academic program, or basis for participation in any aspect of a VCU program or activity or decisions affecting the individual; and/or
- Sexual assault, dating violence, domestic violence or stalking.

Whether conduct is unwelcome is subjective and determined by the complainant's statements. Severity, persistence or pervasiveness and objective offensiveness are evaluated based on the totality of the circumstances from the perspective of a reasonable person in the same or similar circumstances, including the context in

which the alleged conduct occurred and any similar, previous patterns of conduct.

Sexual harassment can occur by or against an individual of any sex, sexual orientation, gender identity, or gender expression. Sexual harassment may include conduct involving jokes, slurs, epithets, name-calling, threats, intimidation, ridicule, mockery, insults, put-downs, unwanted touching, offensive objects or pictures or other offensive conduct.

**Sexual Exploitation (University)**

Taking non-consensual sexual advantage of another person, excluding behavior that constitutes one of the other forms of sex-based misconduct. Examples include, but are not limited to all of the following:

- Causing or attempting to cause incapacitation (through alcohol, drugs or any other means) for the purpose of compromising another person's ability to give affirmative consent to sexual activity
- Allowing third parties to observe private sexual activity from a hidden location (e.g., closet) or through electronic means without the consent of all participants engaging in the sexual activity (e.g., Skype or live streaming of images)
- Engaging in voyeurism (e.g., watching private sexual activity without the consent of all participants or viewing another person's private body parts in a place where that person would

have a reasonable expectation of privacy)

- Recording or photographing private sexual activity and/or a person's private body parts
- Disseminating or posting images of private sexual activity and/or a person's private body parts
- Prostituting another person
- Engaging in indecent exposure (e.g., intentionally exposing one's private body parts to someone without their consent or engaging in sexual activity in public and witnessed by a non-consenting person)

## Retaliation

Any materially adverse action taken against an individual or group of individuals for reporting an alleged violation of the policy, filing a formal complaint, filing an external complaint, participating or refusing to participate in an investigation or grievance process, opposing in a reasonable manner an action believed to constitute a violation of the policy, or assisting in any manner in an investigation and grievance process. Retaliation includes intimidation, threats, coercion, harassment, discrimination, or any other conduct against any individuals for the purpose of interfering with any right or privilege secured by Title IX or this policy, meaning activity that would discourage a reasonable person from engaging in activity protected under the policy. For the purposes of this definition, "materially adverse action" entails actions that have an adverse effect on the working, academic or VCU-controlled living environment of an

individual or actions that hinder or prevent the individual from effectively carrying out their VCU responsibilities.

An allegation of retaliation will be viewed as a separate offense, meaning that a respondent may be found responsible for retaliation even if not found responsible for the underlying allegation of prohibited conduct.

Retaliation does not include good faith actions lawfully pursued in response to a report of prohibited conduct. In addition, the exercise of rights protected under the First Amendment does not constitute retaliation.

The university retains the discretion to address complaints of retaliation through the Preventing and Responding to Discrimination Policy or through a Student Conduct process or Human Resource process. The Title IX coordinator, in consultation with Student Affairs, Human Resources and/or the Office of the Provost will have the discretion to decide what process will be utilized to address incidents of retaliation.

## Qatar law

VCU policies and procedures that apply to students, faculty and staff at all VCU campus locations. As the laws in foreign countries differ from those of the U.S., below is the translation of Qatar law as it relates to domestic abuse, sexual abuse and harassment committed by computer. Qatar law does not define Consent.

Article (279)

Anyone who copulates with a female without her consent whether coercively, under duress or by ruse is sentenced to death or to life imprisonment.

The sentence is death if the culprit is the relative, the guardian, the caretaker or the servant of the victim or of the previously mentioned.

Article (280)

Anyone who copulates with a female without compulsion, duress or ruse knowing that she is mentally unstable or under sixteen is sentenced to life imprisonment. The culprit is sentenced to death if he is one of the previously mentioned in the second paragraph of the above article.

Article (283)

Anyone who copulates with a male without any consent whether coercively, under duress or by ruse is convicted to no more than fifteen years in prison. The culprit, being one of the previously mentioned in the second paragraph of article (279), is sentenced to death.

Article (286)

Anyone who commits rape by force, ruse or under duress is convicted to no more than fifteen years in prison. The culprit, being one of the previously mentioned in the second paragraph of article (279), is sentenced to life imprisonment or to no more than fifteen years in prison.

Article (287)

Anyone who copulates with a person without compulsion, duress or ruse, knowing that this person is mentally unstable, under sixteen, unwilling or unaware of the action being exposed to, is convicted to no more than fifteen years in prison. The culprit, being one of the previously mentioned in the second paragraph of article (279), is sentenced to life imprisonment or to no more than fifteen years in prison.

Article (293)

Anyone who disturbs or annoys other people by using immoral expressions or words through tireless set or electronic means is convicted to no more than six months and to a fine of no more than three thousand riyals, or to one of these two penalties.

Article (306)

Anyone who purposely assaults a human being without having the intention to kill them but the assault led to their death, is convicted to no more than ten years in prison. If the deed is premeditated, the penalty is no more than fifteen years in prison. In any ways, the culprit is convicted to no more than three years in prison if the victim's parents forgive or accept the wergild.

Article (307)

Anyone who purposely leaves a person with a permanent deformity is convicted to no more than seven years in prison. If this is premeditated, the penalty is no



more than ten years in prison. A permanent deformity is any injury leading to the amputation of an organ or a part of it, or the total or partial disablement of one of the senses in a permanent way. In all cases, the culprit is convicted to no more than two years in prison if the victim or the victim's parents forgive or accept the amount of money.

#### Article (308)

One is convicted to no more than two years and to a fine of no more than ten thousand riyals, or to one of these two penalties in case of purposely assaulting anyone anyhow and the assault leads to their sickness or incapability of accomplishing their work for more than twenty days. The penalty is no more than three years in prison in addition to a fine of no more than fifteen thousand riyals, or one of these two penalties if the deed is premeditated or is executed by more than one person.

#### Article (309)

One is convicted to no more than a year in prison and to a fine of no more than five thousand riyals, or to one of these two penalties in case of purposely assaulting anyone anyhow and the assault is not as grave as it is stipulated in the two previous articles.

#### Article (310)

One is convicted to any of the penalties stipulated in articles (307), (308), (309)

according to the result of the assault in case of giving a person medications or materials leading to a disease or an incapability.

#### Article (315)

One is convicted to no more than ten years in prison in case of assaulting a pregnant woman which leads to abortion.

### **Procedures for reporting a complaint**

The university has procedures in place that serve to be sensitive to those who report sexual assault, domestic violence, dating violence and stalking, including, but not limited to, informing individuals in writing about their right to file criminal charges. The university also provides written notification to students and employees about the availability of counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid assistance and other services on and/or off campus; and options for, and available assistance, in preventing contact between a complainant and a respondent through changes in academic, living, transportation and working situations if requested by the complainant and if reasonably available. These options are available regardless of whether the complainant chooses to report the crime.

To report an allegation of sexual assault, dating violence, domestic violence, stalking, sexual harassment or sexual exploitation



("Prohibited Conduct" under VCU policies), students, employees or third parties may contact any of the resources listed below:

## **VCU Title IX coordinator**

Elizabeth Scott-Francis, Ed.D.

(804) 828-1347

TDD: (804) 828-1420

[titleix@vcu.edu](mailto:titleix@vcu.edu)

Title IX Office, Equity and Access Services  
Grace Street Center, 2nd Floor,  
912 W. Grace Street, Box 843022,  
Richmond, VA 23284-2549

## **Qatar local representatives**

Andrea Cecetka

Director of safety and risk management,  
VCUarts Qatar

Office: (+974) 4402-0668

Mobile: (+974) 3025-1232

The **Title IX and Sex-Based Misconduct Reporting Form**, the university's form for online reporting, can be found online at [https://cm.maxient.com/reportingform.php?VirginiaCommonwealthUniv&layout\\_id=5](https://cm.maxient.com/reportingform.php?VirginiaCommonwealthUniv&layout_id=5).

After an incident of sexual assault and/or domestic violence, the complainant should consider seeking medical attention as soon as possible at Hamad Women's Hospital or Qatar Foundation Medical Clinic.

## **What to do if you or someone you know is sexually assaulted**

- Get to a safe place. Following an assault, the primary concern is to get the survivor to a safe place. Once there, the survivor has several options to consider. If the assault occurred on VCUarts Qatar property, Education City, at a VCUarts Qatar-sponsored and sanctioned function or while in Education City international housing, they can:
  - Contact someone that they can trust — a friend or relative to stay with the complainant and support them
  - Call the assistant dean for student affairs:
    - Personal Development and Counseling Staff (confidential reporting source): (+974) 4402-0635  
[vcuqdcsc@vcu.edu](mailto:vcuqdcsc@vcu.edu)

The preservation of evidence is important. Do not wash, use the toilet, or change clothing, if you can avoid it. If you do change clothes, put all clothing you were wearing at the time of the attack in a paper, not a plastic, bag.

- Seek medical attention. After an incident of sexual assault and/or domestic violence, consider seeking medical attention as soon as possible. For assistance in obtaining medical

attention, contact:

- Hamad Women's Hospital  
Primary Care Center,  
(+974) 4439-6666
- Qatar Foundation  
Primary Care Center  
(+974) 4454-1244
- Consider contacting local law enforcement in conjunction with VCUarts Qatar officials. For assistance, contact:
  - Archana Kumar, director of human resources:  
Office: (+974) 4402-0546  
Mobile: (+974) 3013-3505
  - Matthew Nelson Ed.D, Interim Assistant Dean for Student Affairs and Director of Student Life and Engagement Office:  
Office: (+974) 4402-0636  
Mobile: (+974) 6699-0294

It is important that a complainant 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 120 hours so that evidence may be preserved that may assist in proving that the alleged criminal offense occurred/ or is occurring. In circumstances of sexual assault, if complainants 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 disease. Complainants of sexual assault, domestic violence, stalking and dating violence are encouraged to also

preserve evidence by saving text messages, instant messages, social networking pages, other communications and keeping pictures, logs or other copies of documents, if they have any, that would be useful to university investigators or police.

The university offers all members of its community an opportunity to report violations of the Title IX Sexual Harassment and/ or the Sex-Based Misconduct policies and criminal laws. Complainants have the right to decline involvement with the police. The university will assist any complainant with notifying local police if they choose to make a report. The Qatar Foundation Security has authority to investigate incidents of sexual assault, sexual exploitation, domestic violence, stalking and dating violence in VCUarts Qatar-owned or VCUarts Qatar-controlled property. The State of Qatar law enforcement officials also respond to calls for the above referenced offenses that occur outside of the Qatar Foundation Security's authority. Both agencies work cooperatively to assist complainants and investigate offenses as needed.

The university will identify resources, on campus, off campus or both, to include medical and health resources, to persons who have been complainants of sexual assault, sexual exploitation, domestic violence, dating violence and stalking and will apply appropriate disciplinary procedures to those who violate its policies.

The university follows the procedures set forth below to provide a prompt, fair and

impartial process for reports of sexual assault, domestic or dating violence, sexual exploitation and stalking. Key elements of the university’s program include imposition of appropriate sanctions when violations of policy are proven, and confidentiality and fairness consistent with applicable

legal requirements. The standard of proof used by the university for administrative proceedings is a preponderance of the evidence, meaning it is more likely than not that the policy was violated. The criminal justice system uses a higher standard — beyond a reasonable doubt.

Incident being reported:	Procedures VCU will follow:
Sexual assault, stalking, dating violence and/or domestic violence; sexual exploitation	<ol style="list-style-type: none"> <li>1. Depending on when reported (immediate vs. delayed report), VCU administrators will provide the complainant with access to medical or counseling care, or other immediate resources.</li> <li>2. University will assess the immediate safety needs of the complainant.</li> <li>3. University will assist the complainant with contacting Student Affairs, the deputy safety officer and/or local police if the complainant requests. The complainant will be provided with contact information for the local police department.</li> <li>4. University will provide each party with referrals to on- and off-campus resources, as required.</li> <li>5. University will assess the need to implement interim or long-term protective measures, such as housing changes, change in class schedule, “No contact” directive between both parties.</li> <li>6. University will provide a “No contact” and/or a “No trespass” directive, etc., if deemed appropriate.</li> <li>7. University will provide a written explanation of rights and options.</li> <li>8. University will provide a copy of the appropriate policy to each party and inform them regarding time frames for inquiry, investigation and resolution.</li> <li>9. University will provide each party with the same opportunity during the investigation to be heard, to submit evidence, and to identify witnesses who may have relevant information. Each party also has the right to be accompanied by an adviser of their respective choosing at any stage of the investigation and any subsequent proceedings.</li> <li>10. University will keep each party informed of the status of an ongoing administrative investigation and the outcome.</li> <li>11. University will enforce the anti-retaliation policy and take immediate and separate action against parties that retaliate against a person for reporting a sex-based discrimination or for participating in an investigation.</li> </ol>

## **Assistance for complainants: Rights and options**

Regardless of whether a complainant elects to pursue a criminal complaint or whether the offense is alleged to have occurred on or off campus, the university will assist complainants of sexual assault, sexual exploitation, domestic violence, dating violence and stalking and will provide each complainant with a written explanation of their rights and options.

Such written information will include:

- The procedures complainants 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 complainants and other necessary parties
- A statement that the institution will provide written notification to students and employees about complainant 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, as well as an explanation of the procedures for institutional disciplinary action

The university complies with commonwealth of Virginia law in recognizing orders of protection and requests that any person who obtains an order of protection from

Virginia or any other U.S. state should provide a copy to the VCU Police and the Title IX coordinator. The State of Qatar does not have any explicit statutes addressing protective orders. Complainants are strongly encouraged to seek assistance from the VCUarts Qatar representatives.

A complainant may also meet with the VCUarts Qatar safety officer to develop a safety action plan, which is a plan for campus security and the complainant to reduce the risk of harm while on campus or coming and going from campus. (This plan may include, but is not limited to escorts, special parking arrangements, providing a temporary cellphone, etc.)

The university may issue an institutional no contact order if deemed appropriate or at the request of the complainant or respondent. Violation of a no contact directive is a separate offense of misconduct. Upon the complainant's request and to the extent of the complainant's cooperation and consent, university offices will work cooperatively to assist the complainant with their health, physical safety, work and academic status, pending the outcome of a formal university investigation of the complaint. Options for and assistance with reasonably available changes to academic, living, working or transportation situations, regardless of whether the complainant chooses to report the crime to campus security or local law enforcement, will be offered in writing. A potential change to the academic situation may be to transfer

to a different section of the class. Potential changes to living situations may include moving to a different room or residence hall. Possible changes to work situations may include changing working hours. Possible changes in transportation may include having the complainant/respondent park in a different location, assisting the complainant/respondent with a safety escort, etc. To the extent possible, VCU will also provide assistance with and/or information about obtaining resources and services such counseling, health services, visa and immigration assistance and assistance in notifying appropriate local law enforcement.

To request changes to academic, living, transportation and/or working situations or protective measures, complainants should contact the Title IX coordinator at (804) 828-1347. University Counseling Services, (804) 828-6200, may provide further assistance in making requests. Student complainants may also contact Personal Development and Counseling at VCUarts Qatar by calling (+974) 4402-0635. Accommodations for VCUarts Qatar students are handled by the Personal Development and Counseling Services office.

Factors that may be considered in providing supportive measures following an allegation include, but are not limited to, the following: the specific need expressed by the complainant; the severity or pervasiveness of the allegations; any continuing effects on the complainant; whether the

complainant and alleged respondent share the same residence hall, dining hall, class, transportation or job location; and whether other judicial measures have been taken to protect the complainant.

Additionally, personal identifiable information about the complainant will be treated as confidential and only shared with those who are investigating/adjudicating the complaint or delivering resources or support services to the complainant. All publicly available record keeping will be made without inclusion of identifying information about the complainant, which includes any required Clery Act reporting and disclosures, as defined in 42 USC 1395 (a) (20). Further, the institution will maintain as confidential, any accommodations or protective measures provided to the complainant to the extent that maintaining such confidentiality would not impair the ability of the institution to provide the accommodations or protective measures.

The university does not publish the name of crime complainants nor house identifiable information regarding complainants in the Daily Crime Log or online. Complainants may request that directory information on file be removed from public sources. The university will assist the student or employee with changing directory information as requested.

**Resources available to persons who report sexual assault, sexual exploitation, domestic violence, dating violence or stalking, include:**



- <https://advocacy.vcu.edu>  
Advocacy Program
  - <https://victimsofcrime.org/getting-help>  
National Center for Victims of Crime
  - [www.rainn.org](http://www.rainn.org) Rape, Abuse and Incest National Network
  - <https://www.justice.gov/ovw/sexual-assault>  
U.S. Department of Justice
  - <https://www2.ed.gov/about/offices/list/ocr/aboutocr.html> U.S. Department of Education, Office for Civil Rights
- These resources are informational in nature and as such, the Personal Development and Counseling Services office or other member of the Division of Student Affairs may assist in finding comparable local resources.

Complainants of sexual assault react to their experiences in different ways. There are feelings and experiences that are common for many complainants, while others may be specific to the given circumstances. A complainant may:

- Feel a loss of control
- Feel a sense of shock and disbelief, numbness and difficulty concentrating
- Go through a period of acting as if nothing happened (after the initial shock is over)
- Be fearful and feel unsafe
- Have flashbacks and/or nightmares

If you have not experienced any of these, it does not mean there is something wrong with how you are healing from the assault. The feelings you experience are part of the healing process.

Responding to someone who has been sexually assaulted:

- Believe them
- Allow them to make choices on their own and heal at their own pace
- Listen and reassure them that it is not their fault
- Refer them to the resources contained in this document

If you would like more suggestions on how to help someone who has experienced violence, visit University Counseling Services' website at <https://advocacy.vcu.edu/faqs>.

### Adjudication of violations

Whether or not criminal charges are filed, the university or a person may file a complaint under applicable VCU policies. Institutional Equity, Effectiveness and Success is the university office responsible for investigating administrative complaints of sexual misconduct.

Reports of all domestic violence, dating violence, sexual assault, sexual exploitation and stalking made to anyone other than confidential sources, such as the VCUarts Qatar Personal Development and Counseling Services staff, will automatically be referred to the Title IX coordinator for assessment regardless of whether the complainant chooses to pursue criminal charges.

### University complaint resolution process

The university has developed two policies that address sexual harassment and sex-based misconduct: (1) Title IX Sexual Harassment and (2) the Sex-Based Misconduct policies. These policies are interrelated and must be read together. The Title IX Sexual Harassment Policy applies to incidents involving complainants who were participating in or attempting to participate in a VCU education program or activity and experienced Title IX sexual harassment, sexual assault, dating violence, domestic violence, and/or stalking that occurred in the United States and (i) on campus; (ii) in any off-campus building owned or controlled by a student organization officially recognized by VCU; or (iii) in a VCU education program or activity off-campus, over which the university exercised substantial control over both the respondent and the context in which the incident occurred. The Sex-Based Misconduct Policy applies to sex-based misconduct that does not fall under the scope of the Title IX Sexual Harassment Policy, including university sexual harassment and sexual exploitation, as well as incidents of sexual assault, domestic violence, dating violence and stalking that do not meet the jurisdictional requirements of the Title IX Sexual Harassment Policy. The resolution procedures established in the university's policies and outlined in further detail below provide a prompt, thorough, fair and impartial process conducted in a manner that is transparent to the parties. Both of these university policies apply to all

members of the VCU community, including employees, students, officially recognized student organizations and third-parties.

Both policies provide that:

- The complainant and the respondent will have timely notice for meetings.
- The complainant, the respondent and appropriate officials will have timely and equal access to any information that will be used during formal and informal resolution processes and hearings.
- Officials who have a conflict of interest or bias for or against the complainant or respondent will not conduct disciplinary procedures.
- Both the complainant and the respondent have the right to be accompanied by an adviser of their choosing.
- The complainant and respondent will be notified simultaneously, in writing, of the initial, interim and final decision of any disciplinary proceeding.
- As noted under the following procedures, Requests for Appeal may be made by either party as outlined under section (19)(c) of the respective policies. Additionally, nothing in the policies abrogates post-adjudication rights as provided by state and federal law (i.e., State Grievance Procedure, the Office for Civil Rights, and/or the Equal Opportunity Employment Commission).

Investigators and Hearing Panel members are appointed by the Title IX coordinator. The Title IX coordinator, investigators, decision-makers, and any person who facilitates an informal resolution process receives annual training on issues related to dating violence, domestic violence, sexual assault and stalking, as well as how to conduct an investigation and hearing process that protects the safety of complainants and promotes accountability.

These procedures offer two forms of resolution of reports made under the applicable policies, informal resolution, which includes a variety of informal options and channels for resolving complaints, and formal grievance resolution, which involves investigation, review and sanction, if applicable, by a hearing panel, as outlined below. For a more detailed explanation of the complaint resolution procedures, please review the policies on the following website: <https://vcu.public.doctract.com>.

### Expectations

The parties will have an equal opportunity to the following:

- Be heard
- Submit information and corroborating evidence
- Identify witnesses who may have relevant information
- Submit questions that they believe should be directed by the investigator to each other or to any witness
- Meet separately with the investigator

- Be accompanied by an adviser of their choosing

Anyone participating in the administrative process is required to:

- Preserve evidence
- Provide truthful information
- Act in good faith
- Respect any interim measures
- Ensure their actions could not be reasonably interpreted as retaliation

### Informal resolution procedures

Informal resolution resolves a formal complaint by the parties reaching a mutually agreed upon resolution that does not involve a full investigation and adjudication. Informal resolution is voluntary and the university will not compel a complainant or a respondent to engage in this resolution option. Informal resolution is not appropriate in all cases and the Title IX coordinator has the discretion to determine whether a matter is appropriate for informal resolution and to determine the method of informal resolution that may be appropriate in a specific case. Any informal resolution must adequately address the concerns of the complainant and the respondent, as well as the overall interest of the university in stopping, remedying and preventing the misconduct. Informal resolution is not available to resolve allegations that an employee sexually harassed a student. Methods of informal resolution may include, but are not limited to: conflict resolution, mediation, restorative justice, facilitated

conversations, counseling, training and/or educational conversations or projects.

To initiate the informal resolution process, a complainant needs to submit a formal complaint and communicate their preference to resolve the matter informally to the Title IX coordinator. A respondent who wishes to initiate the informal resolution process should contact the Title IX coordinator. Following a request by a party for informal resolution, the Title IX coordinator will provide the parties a written notice disclosing: (i) the allegations in the formal complaint; (ii) the requirements of the process, including the circumstances under which it precludes the parties from resuming a formal complaint arising from the same allegations; (iii) the rights of the parties to withdraw from the informal resolution process and proceed to and/or resume the formal grievance process; and (iv) any consequences resulting from participating in the informal resolution process, including the records that will be maintained and shared. The Title IX coordinator will obtain voluntary, written confirmation from the parties that they wish to resolve the formal complaint through informal resolution before proceeding.

#### **Informal Resolution Facilitator**

Upon obtaining written consent from the parties to engage in informal resolution and the Title IX coordinator has determined that informal resolution is appropriate, the Title IX coordinator will appoint a trained person, from inside or outside the university, to

facilitate the informal resolution process. All appointed facilitators will be free from bias and any actual conflict of interest.

#### **Disclosure of Information**

Where the complainant or respondent withdraws from informal resolution, informal resolution is otherwise terminated for any reason or an informal resolution agreement is breached by either party, any statements or disclosures made by the parties during the course of informal resolution cannot be used in the grievance process without written consent of the parties. Likewise, the informal resolution facilitator may not serve as a witness in a hearing unless the parties provide written consent to such participation.

#### **Outcome**

Any agreement reached during informal resolution must be approved by the Title IX coordinator. If the parties reach an agreement that is approved by the Title IX coordinator, the formal complaint is considered resolved and the matter will be closed by the Title IX coordinator, with both parties receiving simultaneous written notification of the final outcome. Failure to abide by a resolution agreement that is reached by the parties at the conclusion of the informal resolution process may result in recommencement of the grievance process and/or disciplinary action. If no agreement is reached, the formal complaint will be referred back to the Title IX coordinator for further action. The outcome of formal complaints resolved by informal resolution is not appealable.

**Time Frame for Completing Informal Resolution**

The time frame for completing informal resolution may vary, but the university will seek to complete the process within thirty (30) business days of a party’s request for informal resolution. The parties will be notified in writing.

**Formal grievance procedures under the Title IX Sexual Harassment Policy**

**Investigation Steps**

- Notification in writing to the parties of the commencement of an investigation
- Interviews of the parties and witnesses and gathering of relevant information
- Inspection and review of evidence and the preliminary investigation report
- Additional investigation as necessary
- The investigator will prepare a final investigation report that fairly summarizes the relevant evidence, including relevant elements of the parties’ responses to the preliminary investigation report and evidence inspection and review. The final investigation report will not include findings of whether the conduct occurred as alleged and whether a policy violation occurred. These determinations will be made at a hearing.
- The investigator will share the final investigation report with the Title IX coordinator who will send the final

investigation report and exhibits to the parties and their advisers, if any, in an electronic format or hard copy, at least ten (10) business days prior to the hearing.

**Hearing Panel**

The Title IX coordinator will appoint a standing pool of individuals who can serve as hearing panel members. The pool shall include trained members of the university community and also may include external professionals with appropriate experience and training at the Title IX coordinator’s discretion. All individuals appointed to the hearing panel pool shall receive training in accordance with Section 21 of the Title IX Sexual Harassment Policy. No less than ten (10) business days prior to the hearing, the Hearing Officer will send written notice of the hearing to the parties.

The parties, their advisers, may be present throughout the entire hearing, excluding deliberations. Anyone appearing at the hearing to provide information will respond to questions on their own behalf. Cross-examination of the complainant, the respondent, and any witnesses shall not be conducted by the opposing party and must be conducted by their adviser. Absent good cause shown, a party may not present a witness at a hearing who was not interviewed during the investigation. In reaching its determination, the hearing panel may consider relevant statements made by a party or a witness, even if that individual declines to participate in the hearing or to



submit to cross-examination, in whole or in part. The hearing panel may not draw any inference about the determination regarding responsibility based solely on a party or a witness declining to attend the hearing or to respond to cross-examination questions.

### **Hearing Determination**

The hearing panel will deliberate in private to determine whether the conduct occurred as alleged and whether the respondent violated the policy. The hearing panel shall reach its decision by majority vote using the preponderance of the evidence standard. The vote of each hearing panel member will not be shared with the parties.

When a hearing panel determines that the respondent is responsible for a violation of the policy, the panel will determine the appropriate sanctions, in accordance with Section 16 of the Title IX Sexual Harassment Policy. As part of its deliberations, the panel shall receive the respondent's prior conduct record/personnel actions (if any) and the parties' impact and mitigation statements. The appropriateness of any particular sanction is reviewed on an individual basis based on the unique facts and circumstances of the case. The panel will determine sanctions by a majority vote. The vote of each hearing panel member will not be shared with the parties.

The Hearing Officer will provide the panel's written determination to the parties simultaneously within ten (10) business days of the hearing, which will include

the procedures and permissible bases for appeal. In the event of delay or extension of this time frame, the Hearing Officer will provide written notice to the parties of the delay or extension and the reason(s). The Title IX coordinator is responsible for effective implementation of any remedies and will be provided the written determination by the Hearing Officer for such purpose.

The determination regarding responsibility becomes final either on the date the Appellate Officer provides the parties with a written determination of the results of the appeal, if an appeal is filed, or if an appeal is not filed, the date on which an appeal would no longer be considered timely.

The university will make a good faith effort to complete the grievance process within a ninety to one hundred twenty (90-120) business day time period, including appeal. This time frame may be temporarily delayed or extended for good cause, with written notice to the complainant and the respondent of the delay or extension and the reasons for the action.

### **Formal grievance procedures under the Sex-Based Misconduct Policy**

#### **Investigation Steps**

- Notification in writing to the parties of the commencement of an investigation
- Interviews of the parties and witnesses and gathering of relevant information

- Inspection and review of evidence and the preliminary investigation report
- Additional investigation as necessary
- Notification in writing to the parties of the completion and availability of the final investigation report
- Notice of investigative finding and an opportunity to accept or contest the findings

**Recommended finding of no responsibility**

- If the complainant accepts the investigator’s finding(s) or does not submit a response within five (5) business days of receipt of the Notice of Investigative Finding, the formal complaint will be considered resolved and the case closed and documented in accordance with applicable university policies.
- If the complainant contests one or more of the investigator’s finding(s), the complainant shall submit a written statement explaining the reasons for contesting and how the grounds to contest as detailed in Section 15(l) (i) of the Sex-Based Misconduct Policy are met. The Title IX coordinator will ensure that the respondent has an opportunity to review and respond in writing to any such statement within five (5) business days. The Title IX coordinator shall review these statements and may return the case for additional investigation or refer the

case to the Hearing Panel for further proceedings as outlined below.

**Recommended finding of responsibility**

- If the respondent accepts the investigator’s finding(s) or does not submit a response within five (5) business days of receipt of the Notice of Investigative Finding, the Title IX coordinator will refer the case for an administrative resolution on sanctions. In an administrative resolution on sanctions, the complainant, respondent, the Title IX coordinator, the Senior Vice Provost for Student Affairs or the responsible senior management executive (in the case of employees) will attempt to agree upon an appropriate sanction. If an agreement on sanctions is not reached, the Title IX coordinator will refer the case for a hearing solely on the issue of sanctions.
- If the respondent contests one or more of the investigator’s finding(s), the respondent shall submit a written statement explaining the reasons for contesting and how the grounds to contest as detailed in Section 15(l)(i) of the Sex-Based Misconduct Policy are met. The Title IX coordinator will ensure that the complainant has an opportunity to review and respond in writing to any such statement within five (5) business days. The Title IX coordinator shall review these statements and may return the case for

additional investigation or refer the case to the Hearing Panel for further proceedings as outlined below.

### **Hearing Panel**

The Title IX coordinator will appoint a standing pool of individuals who can serve as hearing panel members. The pool shall include trained members of the university community and also may include external professionals with appropriate experience and training at the Title IX coordinator's discretion. All individuals appointed to the hearing panel pool shall receive training in accordance with Section 21 of the Sex-Based Misconduct Policy. No less than ten (10) business days prior to the hearing, the Hearing Officer will send written notice of the hearing to the parties.

The hearing is not a re-investigation of a formal complaint. Rather, the hearing is an opportunity for the parties to address the hearing panel, in person, about whether the preponderance of the evidence standard was appropriately applied by the investigator, whether the investigation was thorough, fair and impartial, and whether there is sufficient evidence to support the investigator's findings regarding responsibility by a preponderance of the evidence. The parties may address any information in the final investigation report, including exhibits; the evidence that was subject to the parties' inspection and review; and, the contesting statement and response

thereto. The parties and their advisers may be present throughout the entire hearing, excluding deliberations.

### **Hearing Determination**

The hearing panel will deliberate in private to determine whether the preponderance of the evidence standard was appropriately applied by the investigator by making a finding: (1) whether the concerns stated by the contesting party raise substantial doubt about the thoroughness, fairness and/or impartiality of the investigation; and if not, (2) whether there is sufficient evidence to support the investigator's findings regarding responsibility by a preponderance of the evidence. The hearing panel shall reach its decision by majority. The vote of each hearing panel member will not be shared with the parties.

If the hearing panel finds that concerns stated by the contesting party raise substantial doubt about the thoroughness, fairness and/or impartiality of the investigation, it will remand the matter to the Title IX coordinator with instructions for further investigation or other action.

If the hearing panel finds there is insufficient evidence to support the investigator's recommended finding, it may remand the matter for further investigation or reject the investigator's recommended finding(s) and make alternative finding(s).

When a hearing panel affirms that there is sufficient evidence to support a finding

of responsibility, it will then determine the appropriate sanctions, in accordance with Section 16 of the policy. As part of its deliberations, the panel shall receive the respondent's prior conduct record/ personnel actions (if any) and the parties' impact and mitigation statements. The appropriateness of any particular sanction is reviewed on an individual basis based on the unique facts and circumstances of the case. The panel will determine sanctions by a majority vote. The vote of each hearing panel member will not be shared with the parties.

The Hearing Officer will provide the panel's written determination to the parties simultaneously within ten (10) business days of the hearing, which will include the procedures and permissible bases for appeal. In the event of delay or extension of this time frame, the Hearing Officer will provide written notice to the parties of the delay or extension and the reason(s). The Title IX coordinator is responsible for effective implementation of any remedies and will be provided the written decision by the Hearing Officer for such purpose.

The determination regarding responsibility becomes final either on the date the Appellate Officer provides the parties with the written determination of the results of the appeal, if an appeal is filed, or if an appeal is not filed, the date on which an appeal would no longer be considered timely.

### Appeals

Appeals are limited to the following grounds:

- Procedural irregularity that affected the outcome of the matter;
- New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter; and
- The Title IX coordinator or investigator(s), Hearing Officer or other member of the hearing panel had a conflict of interest or bias against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the matter.

Although a party may disagree with a decision, that alone is not a basis for appeal. Instead, the Request for Appeal must specifically explain the reasons for appealing and how the grounds to appeal are met.

The Appellate Officer will be the following individuals:

- For appeals involving a student-respondent, the Senior Vice Provost for Student Affairs
- For appeals involving a faculty-respondent, the Senior Vice Provost for Faculty Affairs
- For appeals involving a non-faculty employee-employee respondent, the Assistant Vice President for Human Resources

If the appeal request is timely and specifies one or more of the grounds outlined in section (19)(c) of the respective policies, the parties will have ten (10) business days from the date they received notice that the appeal has been accepted to submit a written statement in support of, or challenging, the appeal. The Title IX coordinator, the investigator and/or Hearing Officer will also be provided an opportunity to respond to any portion of the appeal that was approved and that involves them. Copies of written responses will be shared with the other parties. Additional rebuttal statements will not be accepted. The Appellate Officer shall deny the request if both conditions are not met and will notify the parties, their advisers, and the Title IX coordinator, in writing of the denial and the rationale. The decision of the Appellate Officer is final.

Typically, the appeal will be confined to a review of the written documentation and record of the investigation and/or hearing, and pertinent documentation regarding the grounds for appeal. The Appellate Officer, however, may choose to meet with a party if they deem it necessary for their review of the appeal. If the opportunity to meet is provided to one party, it will be provided automatically to the other party.

The Appellate Officer shall render a decision applying the principles outlined in section (19)(e) of the respective policies. Within ten (10) business days of receipt of the written statements in support of or challenging the appeal, the Appellate Officer will issue the outcome of the appeal and the rationale for

the result to the parties and Title IX coordinator. This time frame may be extended for good cause, with written notice to the parties and Title IX coordinator of the extension and the reason for the extension. The Appellate Officer's decision is final and not subject to any further appeal.

### **Sanctions**

The Title IX Sexual Harassment and Sex-Based Misconduct policies prohibit a broad range of conduct, all of which is serious in nature. Where there is a finding of responsibility or a respondent accepts responsibility, the hearing panel may impose one or more sanctions. In keeping with the university's commitment to foster an environment that is safe, inclusive and free from discrimination and harassment, the hearing panel shall have wide latitude in the imposition of sanctions tailored to the facts and circumstances of each complaint, the impact of the conduct on the complainant and university community and accountability for the respondent.

Sanctions may include educational, restorative, rehabilitative and punitive components. In determining the appropriate sanction(s), the hearing panel will be guided by a number of considerations, including:

- The nature and severity of the policy violation
- The impact of the misconduct on the complainant
- The impact or implications of the misconduct within the university community



- Prior misconduct by the respondent, including the respondent's prior discipline history, at VCU or elsewhere, and any relevant criminal convictions
- Whether the respondent has accepted responsibility for the misconduct
- The maintenance of a safe, nondiscriminatory and respectful university environment
- Any other mitigating, aggravating or compelling factors
- When present, the following aggravating factors may lead to more severe sanctions:
  - Respondent is in a position of authority or influence
  - Use of force or violence related to the violation of the policy or a pattern of violent behavior
  - Use or display of a weapon
  - Deliberately taking advantage of another person's state of incapacitation
  - Victim under the statutory age of consent

## Sanctions for Students

Sanctions are effective immediately, unless otherwise specified by the university. They may include any of the sanctions below, individually or in combination:

**Expulsion:** Permanent dismissal from the university, administrative withdrawal from classes and loss of all university privileges.

**Revocation of Degree:** Rescinding a university degree that has been awarded.

**Withholding Degree:** Delay awarding a degree otherwise earned until completion of all sanctions imposed.

**Revocation of Admission:** Rescinding an offer of university admission.

**Suspension:** Removal of a respondent from the university for a defined period of time, for a maximum of six (6) consecutive semesters, during which a student loses all university privileges, which generally includes access to facilities, programs, classes, and premises.

**Deferred Suspension:** Designated period of time during which a student is given the opportunity to demonstrate the ability to abide by university policy. Subsequent violations of university policy during the term of a deferred suspension will result in a full suspension.

**Disciplinary Probation:** A specified period of time, a minimum of one semester, requiring a respondent to avoid a recurrence of any conduct that violates the Student Code of Conduct and/or any university policy that may result in additional university sanctions, including but not limited to, suspension or expulsion.

**Censure:** Written notice warning a respondent to avoid recurrence of any conduct that violates the policy and/or any university policy. Subsequent

violations of the policy or any university policy may result in more severe disciplinary action.

**Campus Ban:** Prohibits access to all or a portion of the VCU campus.

**Loss of University-Related Privileges:** Denial of services, privileges, and benefits which may impact participation in extracurricular activities, residence in university housing, university employment, Honors College, leadership within student organizations, academic activities, and study abroad.

**Restitution:** Monetary reimbursement to the university and/or member of the university community or others to cover costs of damage, injury, or loss of community or personal property as a result of misconduct.

### Sanctions for Employees

Sanctions are effective immediately, unless otherwise specified by the university. They may include any of the sanctions below, individually or in combination:

**Termination of Employment:** Permanent separation of the employment relationship between the university and the respondent.

**Suspension/Administrative Leave (employee-respondents):** Loss of work for a defined period of time, with or without pay, during which respondent

will not be allowed on university premises or permitted to participate in, or supervise, any university education program or activity.

**Loss of Merit Pay Increase:** Ineligibility for a merit pay increase for a defined period of time.

**Counseling:** Verbal or written communication which conveys that an employee's conduct was improper and must be corrected.

**Written Notice or Warning:** Formal disciplinary action which has been taken in response to misconduct. Formal disciplinary actions are placed in an employee's personnel record.

**Demotion:** Change in position with lower qualifications and pay.

**Loss of Supervisory Titles and/or Responsibilities:** Loss of title and/or the ability to supervise other employees or students, which may have an effect of changing an employee's job classification status.

**Campus Ban:** Prohibits access to all or a portion of the VCU campus.

Nothing in this policy prevents the university from imposing disciplinary action against a respondent for misconduct which does not constitute a violation of the policy, but may violate other university policies. The university reserves its right to take

such action as it deems appropriate to further its educational mission and to protect the safety and security of the university community.

In addition to any sanction imposed by the hearing panel, the university may provide remedies designed to restore and preserve equal access to the university's educational program or activity to the complainant. The Title IX coordinator is responsible for effective implementation of any remedies provided. Such remedies and actions may include, but are not limited to: imposition or continuation of a no contact directive; referral to counseling and health services; referral to the Employee Assistance Program; continuing any supportive measures previously provided; required training or education for individuals; broad-based training or educational programming to the university community; permanent modifications to housing assignments; permanent modifications to work arrangements; academic support services; and increased monitoring, supervision and/or security at targeted locations where the misconduct occurred or is likely to reoccur.

### **Sex offender registration**

The federal Campus Sex Crimes Prevention Act requires institutions of higher education to issue a statement advising the campus community where information concerning registered sex offenders may be obtained. The State of Qatar does not maintain a sex offender registry.

### **Notification to victims of crimes of violence or nonforcible sex offense**

The university will, upon written request, disclose to the alleged victim of a crime of violence or a nonforcible sex offense the report on the results of any disciplinary proceeding conducted by such institution against a student who is the alleged perpetrator of such crime or offense. If the alleged complainant 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.

Crime statistics

The following statistical information was furnished by the Qatar Foundation.  
VCUarts Qatar does not have any residential housing facilities.

2021-2023 yearly totals

Criminal Offenses				
Crime Classification	Year	On-Campus Total <sup>1</sup>	Noncampus Property <sup>2</sup>	Public Property <sup>3</sup>
Murder/Non-negligent Manslaughter	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
Manslaughter by Negligence	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
Sex Offense: Rape	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
Sex Offense: Fondling	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
Sex Offense: Incest	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
Sex Offense: Statutory Rape	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
Robbery	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
Aggravated Assault	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
Burglary	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
Motor Vehicle Theft <sup>4</sup>	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
Arson <sup>5</sup>	2023	0	0	0
	2022	0	0	0
	2021	0	0	0

Violence Against Women Act Offenses				
Crime Classification	Year	On-Campus Total <sup>1</sup>	Noncampus Property <sup>2</sup>	Public Property <sup>3</sup>
Domestic Violence	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
Dating Violence	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
Stalking	2023	0	0	0
	2022	0	0	0
	2021	0	0	0

Arrests and Disciplinary Referrals for Violation of Weapons, Drug Abuse and Liquor Laws				
Crime Classification	Year	On-Campus Total <sup>1</sup>	Noncampus Property <sup>2</sup>	Public Property <sup>3</sup>
Liquor Law Arrest	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
Drug Law Arrest	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
Weapon Law Arrest	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
Liquor Law Referral	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
Drug Law Referral	2023	0	0	0
	2022	0	0	0
	2021	0	0	0
Weapon Law Referral	2023	0	0	0
	2022	0	0	0
	2021	0	0	0

<sup>1</sup> Incidents reported to have occurred on VCUarts Qatar Campus, which may include incidents that occurred on Education City property where the VCUarts Qatar Campus is located.

<sup>2</sup> Incidents reported to have occurred within any building owned or controlled by VCU Qatar, or a student organization, that is used in direct support of the institution's education purpose, is frequently used by students, and is not within the same reasonable contiguous geographical area of the institution. The Noncampus Clery geography category also includes domestic short stay-away and repeated use trips with students where VCU controlled the location during the trip in support of the institution's educational purposes.

<sup>3</sup> Incidents reported to have occurred on all public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus or immediately adjacent to and accessible from the campus.

<sup>4</sup> Includes theft of motor vehicles, electric driven vehicles such as electric scooters and electric bikes.

<sup>5</sup> Arson is NOT part of the hierarchy. Arson is always counted regardless of the nature of any other offense committed during the same incident. When multiple offenses are committed during the same distinct operation as an Arson offense, the most serious offense along with the Arson is counted.

## 2021-2023 Unfounded reports<sup>6</sup> (VCUarts Qatar Campus)

2023 – There were zero (0) unfounded offenses.

2022 – There were zero (0) unfounded offenses.

2021 – There were zero (0) unfounded offenses.

<sup>6</sup> Unfounded incidents are those determined by a sworn law-enforcement officer to be false or baseless following a full investigation, and are not included in the total count.

## 2021-2023 Hate crimes<sup>7</sup> (VCUarts Qatar Campus)

2023 – There were zero (0) hate crimes reported.

2022 – There were zero (0) hate crimes reported.

2021 – There were zero (0) hate crimes reported.

<sup>7</sup> Clery reportable hate crimes include the crime categories in the above tables, as well as Larceny -Theft, Simple Assault, Intimidation, or Destruction/Damage/Vandalism of Property.