# POLICY REGARDING SEXUAL HARASSMENT AND SEXUAL OFFENSES (Title IX)

WCUI is committed to providing a work and school environment free of unlawful harassment, sexual violence or discrimination. In furtherance of this commitment, all students and employees are required to take our mandatory Sexual Harassment and Prevention Training upon starting with the Institute and generally every year thereafter. WCUI prohibits harassment or discrimination based on race, religion, creed, color, national origin, ancestry, sex (including pregnancy, childbirth or related medical conditions), military or veteran status, physical or mental disability, medical condition, marital status, age, sexual orientation, gender, gender identity or expression, genetic information or any other basis protected by the federal, state or local law. Additionally, in accordance with Title IX of the Education Amendments of 1972, WCUI prohibits discrimination based on sex, which includes sexual harassment and sexual violence, and the Institute has jurisdiction over Title IX complaints.

WCUI's anti-harassment policy applies to all persons involved in the operation of the Institute, and prohibits unlawful harassment by any employee of the Institute, as well as students, customers, vendors or anyone who does business with the WCUI. It further extends to prohibit unlawful harassment by or against students. Any employee, student or contract worker who violates this policy will be subject to disciplinary action. To the extent a customer, vendor or other person with whom the Institute does business engages in unlawful harassment or discrimination, the Institute will take appropriate corrective action.

Students, faculty and staff should be aware that discrimination and/or other harassment based on sex, gender identity or sexual orientation is unacceptable. The Institute prohibits dating violence, domestic violence, sexual assault, and stalking as defined below. To fulfill its educational mission, the Institute has designated campus specific Title IX Coordinators (contact information listed in the chart below) as its designated representatives to coordinate the Institute's compliance with TitleIX of the Education Amendments of 1972, as amended and the Clery Act. Students, faculty or staff who feel that they have been the victim of sex harassment, sex discrimination, sexual violence or other sexual misconduct should contact the Title IX Coordinator at their campus and follow the procedures in this policy. For grievances other than those related to Title IX, students should follow the procedure outlined in the Campus Complaint Procedures policy located in the student catalog.

As part of WCUI's commitment to providing a harassment-free working and learning environment, this policy shall be disseminated to the Institute community through publications, the WCUI website, new employee orientations, student orientations, and other appropriate channels of communication. The Institute provides training to key staff members to enable the Institute to handle any allegations of sexual harassment or sexual violence promptly and effectively. The Institute will respond quickly to all reports, and will take appropriate action to prevent, to correct, and if necessary, to discipline behavior that violates this policy.

The Institute will include information on crimes of sexual violence in its Clery Act Annual Security Report in a manner that protects the identity of the victim. The Institute's Title IX Coordinator has primary responsibility for receiving, evaluating and investigating sexual misconduct reports and for maintaining accurate Clery Act crime statistics. The Title IX Coordinator is responsible for informing the Campus Security Survey Administrator within 24 hours after receiving a sex offense report for purposes of maintaining accurate Clery Act crime statistics.

# **Key Definitions**

**Sexual harassment** is defined as unwelcome advances, requests for sexual favors, other verbal or physical sexual conduct, or any other offensive unequal treatment of an employee, student, or group of employees or students that would not occur except for their sex when:

- 1. The advances, requests or conduct have the effect of interfering with performance of duties or studies or creating an intimidating, hostile, or otherwise offensive work or academic environment.
- 2. Submission to such advances, requests or conduct is explicitly or implicitly a term or condition of an individual's employment or academic achievement or advancement.
- 3. Submission to or rejection of such advances, requests or conduct is used as a basis for employment or academic decisions.

Sexual Harassment is a violation of Section 703 of Title VII of the Civil Rights Act of 1964 as amended in 1972, (42 U.S.C. S2000e, et. seq.), and Title IX of the Education Amendments of 1972 (20 U.S.C. 1691, et. seq.) and is punishable under both federal and state laws. Forms of sexual harassment include, but are not limited to, sexist remarks or behavior, constant offensive joking, sexual looks or advances, repeated requests for dates, unwelcome touching, promise of reward for sexual favors. Students, faculty or staff who experience sexual harassment should be encouraged to make it clear to the alleged offender that such behavior is offensive. However, failure to comply with this provision does not defeat the Institute's investigation of the allegation.

**Sexual violence** means physical sexual acts perpetrated against a person's will or where a person is incapable of giving consent. A number of acts fall into the category, including sexual assault or harassment based on sexual orientation, domestic violence, dating violence, and stalking. Alleged sexual violence against another may also constitute a crime resulting in an additional, independent law enforcement investigation falling outside of this Grievance Policy. These acts will not be tolerated at the Institute as such acts are inappropriate and create an environment contrary to the goals and mission of the Institute. Any such acts will be thoroughly investigated and will subject an individual to appropriate disciplinary sanctions and/or possible action by appropriate law enforcement agencies.

**Sexual assault** includes rape, acquaintance rape, fondling, incest, and statutory rape, as well as other forms of nonconsensual sexual activity.

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

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

**Stalking** means "engaging in a course of conduct (two or more acts including but not limited to acts in which the stalker directly, indirectly, or through third parties, or by any action, method, device or means, follows, monitors observes, surveils, threatens or communicates to or about a person or interferes with his or her property that is directed at a specific person and would cause a reasonable person to fear for his or her safety or the safety of others or suffer substantial emotional distress. Reasonable persons means a reasonable person under similar circumstances and with similar identities to the victim. Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

Consent means voluntary agreement to engage in sexual activity by verbal agreement or active and willing participation in sexual activity. Someone who is incapacitated or under the age of consent under state law cannot consent. Past consent does not imply future consent. Silence or an absence of resistance does not imply consent. Consent to engage in sexual activity with one person does not imply consent to engage in sexual activity with another. Consent may be withdrawn at any time. Coercion, force, or threat of either invalidates consent.

## **Prohibited Conduct**

This policy strictly prohibits sexual or other unlawful harassment or discrimination as well as sexual violence. Sexual or other unlawful harassment or discrimination includes any verbal, physical or visual conduct based on sex, race, age, national origin, disability or any other legally protected basis if:

- i. submission to such conduct is made either explicitly or implicitly a term or condition of an individual's education or employment;
- ii. submission to or rejection of such conduct by an individual is used as a basis for decisions concerning that individual's education or employment; or
- iii. it creates a hostile or offensive work environment, which means the alleged conduct is sufficiently serious to limit or deny a student's or ability to participate or benefit from the student's education program.

Unlawful harassment or discrimination may include racial epithets, slurs and derogatory remarks, stereotypes, jokes, posters or cartoons based on race, national origin, age, disability, marital status or other legally protected categories.

Sexual harassment is conduct based on sex, whether directed towards a person of the opposite or same sex, and may include explicit sexual propositions, sexual innuendo, suggestive comments, sexually oriented "kidding" or "teasing", practical jokes, jokes about or displays of obscene printed or visual material, questions about sexual fantasies, preferences or history, and physical contact such as patting, pinching, or intentionally brushing against another person's body. Gender-based harassment, including acts of verbal, nonverbal or physical aggression, intimidation, or hostility based on sex or sex-stereotyping are strictly prohibited, even if those acts do not involve conduct of a sexual nature.

## Victims of Assault/Violence

If you are a victim of a sexual violence, your first priority should be to get to a place of safety. You should then obtain any necessary medical treatment. Information about the alleged offense should be provided to the Title IX Coordinator as soon as possible. Time is a critical factor for evidence collection and preservation.

WCUI strongly advocates that a victim of sexual assault or violence report the incident to police in a timely manner and, if requested to do by the victim, the Institute will assist the victim in contacting the

police. However, the victim is not required to contact the police in order to pursue the Grievance Procedure contained in this policy or for WCUI to conduct an independent investigation under this section.

Filing a police report with the local law enforcement agency will not obligate the victim to prosecute. Filing a police report will:

- Ensure that a victim of sexual assault receives the necessary medical treatment and tests at no expense to the victim;
- Provide the opportunity for collection of evidence helpful in prosecution which cannot be obtained later (ideally a victim of sexual assault should not wash, douche, use the toilet, or change clothing prior to a medical/legal exam); and
- Assure the victim has access to free confidential counseling from counselors specifically trained in the area of sexual assault crisis intervention.

The Title IX Coordinator and has primary responsibility for receiving, evaluating and investigating sexual misconduct reports and for maintaining accurate Clery Act crime statistics. Students, faculty and staff who believe they are the victim of sexual misconduct should report the incident to the Title IX Coordinator. Upon receipt of the report, the Title IX Coordinator has the following responsibilities:

- Provide the complainant with a copy of this policy, information on the
  availability of the Institute's investigatory procedures (see Investigatory
  and Disciplinary procedures below), and information about local victim
  support resources for victims including existing counseling, health,
  mental health, victim advocacy, legal assistance and other services
  available to victims.
- 2. WCUI does not provide on-campus or off-campus counseling services. However, WCUI can and will refer the victim to a non-related, outside counseling service such as a local rape counseling center. In addition, WCUI offers the Employee Assistance Program for all employees.
- 3. Provide options to facilitate changes to transportation, working, academic and/or living situations, if requested, while an informal or formal investigation is pending, including the option to issue a nocontact order. The Institute will seek to maintain the confidentiality of the identity of the victim and any accommodations or protective measures provided to the victim, to the extent that maintaining such confidentiality would not impair the ability of the Institute to provide the accommodations or protective measures. These steps will be taken by the Institute regardless of whether the victim chooses to file a formal complaint.
- 4. Inform the complainant that informal mediation cannot be used by the Institute to resolve sexual violence complaints.
- 5. Inform the complainant of the right to file a separate criminal complaint for allegations relating to sexual violence and that the Institute can assist the victim in doing so, if requested.
- 6. For incidents other than allegations of sexual violence, undertake, with permission of or at the request of the complainant, to resolve the conflict informally by informing the individual alleged to have caused the

grievance that the complaint has been filed; seek to find out the facts; and, if both parties desire it, arrange a meeting to try to resolve the differences. All individuals who are involved in an investigation as the accused, accuser or witness have a duty to keep all information confidential to the extent permitted by law. Persons who violate the confidentiality rights of other individuals may be subject to disciplinary action.

In the event that an attempt at informal resolution of the problem is unsuccessful, or if the complainant or the Institute deems that informal resolution is undesirable or not permitted by law, the Title IX Coordinator will stop the informal resolution process and assist the complainant in filing of a formal complaint or self-initiate a formal investigation.

## Reporting Sexual Offenses - Complaint/Grievance Procedure

If you believe that you have experienced or witnessed harassment, sexual violence or any type of sexual misconduct, WCUI encourages students and employees to promptly report the incident to the local police and/or the Title IX Coordinator as soon as possible after the incident. A report may be made to either or both the police and the Title IX Coordinator. Do not allow an inappropriate situation to continue by not reporting it, regardless of who is creating the situation. No employee, contract worker, student, vendor or other person who does business with the Institute is exempt from the prohibitions in this policy. Supervisors will refer all harassment complaints to the Title IX Coordinator for student-related complaints and to the Human Resources Department if the complaint involves an employee. In order to facilitate the investigation, your complaint should include details of the incident or incidents, names of the individuals involved and names of any witnesses.

To initiate this procedure, a student, faculty member or staff should direct a written complaint to the Title IX Coordinator that states in detail the nature of the complaint, any relevant dates, and the names of any potential witnesses, and any request for confidentiality. In a situation deemed to be an emergency by the Title IX Coordinator, the Institute will issue a Timely Warning and the individual alleged to have caused the grievance or complaint may be temporarily transferred or put on leave pending the outcome of the case. The Title IX Coordinator need not wait for the conclusion of a criminal investigation or criminal proceeding to begin an investigation where warranted.

All complaints involving a student will be referred to the campus's Title IX Coordinator. The Title IX Coordinator is listed below and has the responsibility of overseeing all Title IX complaints and identifying and addressing any patterns or systemic problems that arise during the review of such complaints.

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Title IX Coordinators	<b>Local Phone Number</b>	E-mail Address
Carla Dominguez (Beverly Hills)	(310)289-5123	Carla.Dominguez@wcui.edu
Bryn Logan (Ontario)	(909)483-3808	Bryn.Logan@wcui.edu
Terri Simons (Phoenix)	(602)954-3834	terri.simons@wcui.edu

The Institute ensures that its employees designated to serve as Title IX Coordinators have adequate training on what constitutes sexual harassment, including sexual violence, and that they understand how WCUI's grievance procedures operate. Because complaints can also be filed with an employee's supervisor or Human Resources, these employees also receive training on the Institute's grievance

procedures and any other procedures used for investigating reports of sexual harassment or sexual violence.

A report may be made to either or both the police and the Title IX Coordinator. Where there is any question about whether an incident is a sex offense, a report should be made to the Institute for assistance in determining the nature of the incident.

Any student, faculty or staff, or group of same, alleging that an act of sexual harassment or violence has taken place has the right to seek redress of the grievance by means of the formal procedure below. In order to ensure availability of witnesses and fresh memories of the alleged discriminatory event, all grievances or investigations covered by these formal procedures should be filed as promptly as possible after the alleged discriminatory conduct. While informal resolution of the conflict is always open to the aggrieved party, an attempt at informal resolution is not a prerequisite to filing a formal grievance or to the Institute's obligation to investigate a reported event.

After report of the grievance, the Title IX Coordinator will:

- 1. Provide the complainant with a copy of this policy and information about local victim support resources. Victims of sexual violence will be provided information about evidence preservation.
- 2. Provide options to facilitate changes to transportation, working, academic and/or living situations, if requested, while an informal or formal investigation is pending, including the option to issue a nocontact order.
- 3. Inform the complainant of the right to file a separate criminal complaint for allegations relating to sexual violence and that the Institute can assist the victim in doing so if requested.

The Title IX Coordinator will initiate an investigation within ten days of receipt of the formal grievance to determine whether there is a reasonable basis for taking action. At a minimum, this investigation will consist of interviewing the complainant, the individual alleged to have caused the grievance, and any witnesses to the conflict. Within 30 days, the Title IX Coordinator must recommend one of three actions:

- 1. Concluding that the complaint is without merit and that no further action is warranted.
- 2. Recommending efforts to bring about an informal resolution under this policy if warranted and permitted by law. However, in the case of sexual violence allegations, the Institute does not permit parties to utilize an informal resolution procedure.
- 3. Initiation of a formal grievance hearing to evaluate possible disciplinary action against the individual alleged to have caused the grievance.

Either party, the complainant or the individual alleged to have caused the grievance, may request in writing within ten (10) calendar days after notification by the Institute, a formal hearing if dissatisfied with the conclusion.

# **Requests for Confidentiality**

Reports about sex offenses do not have to be formal signed complaints. The Institute is committed to protecting the confidentiality of victims, and will work closely with individuals who wish to obtain

confidential assistance regarding an incident of sexual misconduct and will maintain the privacy of information to the extent permitted or required by law, even if the victim does not specifically request confidentiality. A victim's personally identifying information will not be included in any publically available recordkeeping, including Clery Act reporting and disclosures such as this Annual Security Report. Memoranda describing any formal reprimand or disciplinary action for violating this policy will be placed in a student's permanent academic file and an employee's permanent personnel file. These documents are maintained in a locked filing cabinet that only applicable administrative staff has access to.

In some cases, the Institute may need to disclose some information about a victim to a third party to provide necessary accommodations or protective measures. The Title IX Coordinator and Campus Director will meet to weigh the victim's confidentiality against the impact on the Institute being able to provide these necessary accommodations or protective measures. Should it be deemed necessary, they will determine what information about the victim needs to be disclosed and to whom it needs to be disclosed to. The victim will be notified regarding which information will be shared, with whom it will be shared and why prior to the Institute sharing the information. The Institute will strive to share as limited information as possible in an effort to protect the victim's identity.

# **Investigation of Reports**

In response to all complaints, the Institute promises prompt and equitable resolution through a reliable and impartial investigation of complaints, including the opportunity for both parties to present witnesses or other evidence. Both the victim and the accused will be afforded equitable rights during the investigative process. The time necessary to conduct an investigation will vary based on complexity but will generally be completed within sixty (60) days of receipt of the complaint. The Institute shall maintain confidentiality for all parties to the extent possible, but absolute confidentiality cannot be guaranteed. In cases where a student does not give consent for an investigation, the Institute will weigh the student's request for confidentiality against the impact on Institute safety to determine whether an investigation must proceed. The Institute may not require a victim to participate in a formal investigation or hearing that it is initiated. Complainants should be aware that in a formal investigation due process generally requires that the identity of the charging party and the substance of the complaint be revealed to the person charged with the alleged harassment.

The preponderance of the evidence standard will apply to investigations, meaning the Institute will evaluate whether it is more likely than not that the alleged conduct occurred. Both parties will receive written notice of the outcome of the complaint.

During the investigation, the Institute will provide interim measures, as necessary, to protect the safety and wellbeing of students and/or employees involved.

To initiate a criminal investigation, reports of sexual violence should be made to "911" or local law enforcement. The criminal process is separate from the Institute's process. To the extent that an employee or contract worker is not satisfied with the Institute's handling of a harassment or discrimination complaint, he or she may also contact the appropriate state or federal enforcement agency for legal relief.

\*Beverly Hills and Ontario Campuses: employees may notify the Department of Fair Employment and Housing by consulting the government agency listings in the telephone book or on-line at www.dfeh.ca.gov. The Department of Fair Employment and Housing will, in appropriate cases, prepare and investigate complaints of harassment or discrimination; after a hearing, the Fair Employment and Housing Commission may award damages to individuals actually injured as a result of such conduct, as well as other remedies.

## **Hearing Procedure**

A Grievance Committee composed of the Title IX Coordinator and one other senior level management personnel who has received annual training on sexual violence and Title IX investigative procedures and who is appointed by the CEO will be convened to review the Title IX Coordinator's recommendations and to receive any oral or written testimony from the complainant, the individual alleged to have caused the grievance, and any relevant witnesses from both parties and any other relevant evidence. The standard of evidence used in the hearing will be "preponderance of the evidence." Both the complainant and the alleged perpetrator will be afforded equal and timely access to any information that will be used at the hearing. No party may have their lawyer present at any stage of the proceedings before the Grievance Committee but may be assisted in the process by a support person of their choice including an attorney.

In all cases, the Title IX Coordinator will maintain regular communications with both the accuser and accused and provide both parties with equal opportunity to provide information, witness statements, evidence, and other information that may be necessary for the Title IX Coordinator and the Grievance Committee to fully evaluate the alleged offense.

#### The Committee will decide:

- 1. Whether the complaint is without merit and that no further action is warranted.
- 2. What, if any, remedial action is necessary.
- 3. The nature, scope and timing of any proposed disciplinary action against the alleged perpetrator.

The determination of the merits of the complaint by the Grievance Committee will be final. The Institute will inform both parties simultaneously of its final determination.

The Title IX Coordinator will, barring extenuating circumstance, complete the investigation and make a determination regarding any necessary discipline of accused and remedies to accuser within 60 days of the date that the report is first received by the Title IX Coordinator. The Campus Director will determine if the incident is indicative of systemic issue related to the sex offense and, if so, work with the Institute staff to recommend changes to Institute policies, procedures or training to prevent re-occurrence.

## **Disciplinary Options**

If the Institute determines that unlawful harassment, discrimination or sexual violence has occurred, immediate appropriate corrective action will be taken in accordance with the circumstances involved, and the Institute will take steps to prevent the recurrence. Any employee determined by the Institute to be responsible for unlawful harassment or discrimination will be subject to appropriate disciplinary action, up to and including termination. Remedies for student-related claims may include, but are not limited to, an order to stay away, suspension or expulsion. In the case of sexual violence, the Institute may be required to formally investigate and, if appropriate, pursue disciplinary action under this policy. In addition, complainants who make accusations of sexual harassment in bad faith may be subject to equivalent disciplinary action.

**Penalties**: Substantiated accusations of sexual violence may result in disciplinary action against the offender, up to and including termination of the employee's employment or the student's enrollment. Other potential penalties for unlawful harassment, discrimination or sexual violence include: suspension, community service, probation, no-contact order, or violence prevention training. In case of any formal proceedings against either a student accused of violating this Policy or an employee brought before a

Grievance Committee proceeding, the penalties shall be as proposed by the Grievance Committee. In addition, complainants who make accusations of sexual harassment in bad faith may be subject to equivalent disciplinary action.

Complaint Record and Notice of Outcome: All proceedings and records will be confidential to the extent permitted by law. However, both parties will be notified, in writing, concurrently about the outcome of any complaint evaluated by the Grievance Committee. Memoranda describing a reprimand will be placed into the files of any student or employee in the event disciplinary action is taken against one of the parties. At the request of the individual alleged to have caused the grievance, a memorandum recognizing a finding of non-harassment or nondiscrimination will be placed into the file of the student or employee.

## **Retaliation Prohibited**

The Institute will not retaliate against you for filing a complaint, and will not tolerate retaliation by students or employees. If you believe you have been retaliated against, you should promptly notify your supervisor, Human Resources or the Title IX Coordinator.

## **Reporting Requirements**

Victims of sexual misconduct should be aware that Institute administrators must issue timely warnings for incidents reported to them that pose a substantial threat of bodily harm or danger to other members of the campus community. The Institute will make every effort to ensure that a victim's name and other identifying information is not disclosed, while still providing enough information for community members to make safety decisions in light of the danger. The Institute reserves the right to notify parents/guardians of dependent students regarding any health or safety risk, or a change in student status.

#### **Additional Information**

Employees should contact Human Resources for more information or any questions related to this policy. Students may contact the Title IX Coordinator with any questions related to this policy. In addition, the U.S. Department of Education Office for Civil Rights ("OCR") investigates complaints of unlawful harassment of students in educational programs or activities. This agency may serve as a neutral fact finder and will attempt to facilitate the voluntary resolution of disputes with the parties. For more information, visit the OCR website at: <a href="http://www.hhs.gov/ocr/">http://www.hhs.gov/ocr/</a>.

## **Education and Training**

In an effort to promote a safe environment and to prevent acts of sexual misconduct, the Institute engages in primary prevention, awareness, bystander intervention and risk reduction training regarding sexual violence, including dating violence, domestic violence, sexual assault and stalking. The Institute educates the student community about this policy, sexual violence prevention and related Institute policies during all orientations held for new students upon the onset of a class. The Title IX Coordinator and persons serving on the Grievance Committee will receive annual training on issues related to sexual violence. The Title IX Coordinator is responsible for training current students and all Institute faculty and staff about the Institute's Title IX policies and conducting the new student training. The Institute also provides ongoing prevention and awareness training for current students and staff at least annually.

# **Bystander Intervention and Risk Reduction**

Sexual violence prevention training includes bystander strategies to intervene and prevent possible dating violence, domestic violence, sexual assault, or stalking before it occurs. Under the Clery Act, Bystander Intervention means safe options for individuals to intervene and prevent possible crimes. As a bystander it is

important to recognize a situation that could lead to a crime, be aware of cultural differences that may lead to violence, identify safe and positive intervention options and take action to intervene. Suggestions for bystander intervention include:

- If you suspect that an individual is intent on having sexual intercourse with an unwilling partner, try to redirect one or both individuals.
- If you know someone who is intent on having sexual intercourse with a partner who is intoxicated, try to redirect them.
- Don't condone sexual bantering in group settings.
- Approach everyone as a friend, avoid using violence.
- Recruit help if necessary and if a situation becomes serious contact the police.

If someone tells you they have been sexually assaulted; believe the person, tell them it is not their fault, get the victim to a safe place, help them notify the Title IX coordinator and encourage them to make a police report (remember it is the victim's choice to report the crime or not).

All crimes, including crimes of sexual violence, can be prevented through steps by the campus community to reduce risk of being a victim of a crime and by intervening before a crime has occurred where there is a reasonable belief that a crime may occur. The Institute urges members of the campus community to take steps to reduce their changes of being a victim of a crime including by: locking doors, securing items of value, walking in pairs at night, avoiding impairment caused by alcohol or drugs and other self-protective steps. In addition, if you witness what you believe to be a situation that may lead to the commission of a crime, the Institute urges all members of the campus community to call 911 or to contact an Institute employee immediately. In addition, members of the campus community may be able to interrupt the commission of a crime of sexual violence by intervening in the situation on a potential victim's behalf where the intervention is not likely to pose harm to the intervenor. The Institute urges all members of the campus community work together to promote a safe campus environment for everyone. The Institute includes training on bystander intervention and risk reduction in all primary and ongoing training for students and staff. The Institute includes bystander intervention and risk reduction awareness in its student and employee sexual violence prevention training.