

Orion College Clery Act Disclosure of Campus Security Policy/Campus Crime Statistics Report; Emergency Response, Evacuation, and Timely Warnings Policy and Procedure; VAWA Sexual Harassment and Sexual Violence Policies and Procedures; Crime Log

Introduction

Orion College (heretofore "OC") complies fully with the published mandates of the Student Right-to-Know and Campus Security Act (Public law 101-542), the Higher Education Technical Amendment of 1991 (Public Law 102-26), the Higher Education Amendment of 1992 (Public Law 102-325), the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (20 U.S.C. Section 1092 (f)), Violence Against Women Act of 1994 (42 U.S.C. sections 13701 through 14040).

Prepared annually, this report contains information pursuant to the requirements of Clery Act and/or HEA and FERPA disclosure standards, and as such is made available to all prospective or active students, employees, and faculty. Publication of the entire report is handled electronically on OC's website by the Department of Compliance and Curriculum Development.

Distribution comes in the form of an HEA-approved notice, detailing the electronic location of the report and a gross outline of its content. This notice is distributed to active students by the Academic Department of annually, on or before October 1st, via email and student memo in the ANGEL learning management system. OC's Business Office distributes this notice likewise to current and applicant employees through internal memo and email. Prospective students may request the report through the Registrar's Office or the Department of Student Services and Career Development, and receive the notice during application.

Program for Reporting and Preventing Crimes and Emergencies

OC recognizes that it is the responsibility of everyone to maintain a safe and comfortable environment. Staff, faculty, and students are encouraged to report all criminal acts, suspicious activities, or emergencies promptly, and have the right to report these matters confidentially if they so choose. Victims or witnesses to a crime are urged to file a report of the incident. Reports can be filed on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics, by contacting one of the designated CSAs. This includes campus security officers, departmental directors, or the Dean of Academics. **School Directory:** http://www.orioncollege.org/students/school_directory/

Employees and students should report all emergencies, crimes, fires, medical emergencies, occurring on or around the OC facility to the Plantation city Police Department by dialing 911 or (954) 797-2100.

Policy for Preparing Annual Statistics

Criminal activity is documented in official Incident Reports and reported to appropriate state and local authorities, as well as filed in a secure location by the Dean of Academics (students) or Business Office Manager (faculty and staff). The annual crime report is prepared by combining crime statistic and data from local police and sheriff departments with OC's internal records from Daily Crime Logs and Incident Reports.

Victim Notification Policy

Upon written (electronic or conventional) request, OC will disclose reports on the results associated with disciplinary proceedings conducted by the school to the alleged victim of a crime of violence (as that term is defined in section 16 of Title 18, United States Code), or a non-forcible sex offense. This includes the disciplinary proceedings conducted by the school against the student(s) who is/are the alleged perpetrator(s) of such a crime or offense. If the alleged victim is deceased as a result of such crime or offense, the next of kin of such victim will be treated as the alleged victim for these purposes.

Policies Concerning Campus Law Enforcement

Enforcement Authority: Security officers are not all required to be certified police officers and may not have the powers of arrest or detainment of certified police officers. They do not have the authority to use force in any situation except for self-defense or the defense of others. While the Security officers are prohibited from conducting criminal investigations, it is their responsibility to secure information on incidents of vandalism, loss, injury, and potential or actual hazards on campus property.

Relationship with state and local police: OC maintains a transparent relationship with state and local authorities, as needed. This includes, but is not limited to, communicating observed or reported offenses to the appropriate department, and opening a dialogue with the necessary authorities in emergency or disaster relief scenarios.

Policies Concerning Security and Access to Campus Facilities and Maintenance

OC contracts professional security personnel who are on site 30 minutes before start of business and 30 minutes after closing. Security personnel are charged with the responsibility to ensure safety for all persons on campus; to screen and log all visitors; to patrol the Clery-designated portions of campus property which fall within their domain, and report on any suspicious or criminal activity observed in the process thereof; and respond to emergency situations or provide assistance or action appropriate to the situation and within the limit of their legal authority.

In addition to a rigorous scheduling procedure for cleaning staff and independent maintenance crews, OC security officers and designated CSA officials assure that all buildings and offices are cleared, all external doors are locked, and the alarm system is properly engaged, at the time of closing.

OC maintains a strict door policy as regards to walk-ins and ingress of scheduled employees, and retains the right to refuse admission to the campus to any person who does not have legitimate business with, or identification for, the school. Any vendors or guests are required to wait for admittance by a designated staff member. All staff, students, and visitors are required to wear a badge or student ID at all times.

Policies Regarding the Possession, Use, and Sale of Alcohol or Illegal Drugs

The Drug-Free Schools and Communities Act requires that institutions of higher education certify that they have adopted and implemented a drug and alcohol prevention program as a condition of receiving funding under any federal program. Specifically, the law requires a biennial review by the institution of its programs to determine the effectiveness of its efforts. The [Biennial Review](#) is designed to fulfill the requirement of drug and alcohol policies, prevention programs, and associated discipline and law enforcement practices implemented by Orion College. Notice of availability of this information is provided to all active faculty, students, and staff on an annual basis. Notice of availability of this information is distributed to all prospective students, faculty, and staff with all pertinent documentation.

The VAWA Sexual Harassment and Sexual Violence Policies and Procedures

I. POLICY SUMMARY

Orion College is committed to creating and maintaining a community where all individuals who participate in the College's programs and activities can work and learn together in an atmosphere free of harassment, exploitation, or intimidation. Every member of the community should be aware that the College prohibits sexual harassment and sexual violence (including dating violence, domestic violence, sexual assault and stalking), and that such behavior violates both law and school policy. The College will respond promptly and effectively to reports of sexual harassment and sexual violence including all the aforementioned categories, and will take appropriate action to prevent, to correct, and when necessary, to discipline behavior that violates this policy on Sexual Harassment and Sexual Violence (hereafter referred to as *Policy*).

This *Policy* applies to all Orion College employees and students at its campus and externship/laboratory sites. This *Policy* furthers the College's commitment to compliance with the law and to the highest standards of ethical conduct as outlined in the College's student and employee Code of Conduct and Ethics.

II. DEFINITIONS

Sexual Harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal, nonverbal, or physical conduct of a sexual nature. Sexual harassment is conduct that explicitly or implicitly affects a person's employment or education or interferes with a person's work or educational performance or creates an environment such that a reasonable person would find the conduct intimidating, hostile, or offensive. Sexual harassment includes sexual violence (see definition below).

The College will respond to reports of any such conduct in accordance with the *Policy*.

Sexual harassment may include incidents between any members of the College community, including faculty and other academic appointees, staff, student employees, students, interns, and non-student or non-employee participants in College programs (e.g., vendors, contractors, visitors, and patients). Sexual harassment may occur in hierarchical relationships, between peers, or between individuals of the same sex or opposite sex. To determine whether the reported conduct constitutes sexual harassment, consideration shall be given to the record of the conduct as a whole and to the totality of the

circumstances, including the context in which the conduct occurred.

Consistent with Orion College's Policies Applying to Campus Activities and Student Conduct as defined in the [Student Handbook](#), harassment of one student by another student is defined as unwelcome conduct of a sexual nature that is so severe and/or pervasive, and objectively offensive, and that so substantially impairs a person's access to College programs or activities that the person is effectively denied equal access to the College's resources and opportunities.

Title IX Officers (Sexual Harassment Officers) Director of Compliance and Curriculum Development and/or Dean of Academics

Sexual Violence is defined as physical sexual acts engaged without the consent of the other person or when the other person is unable to consent to the activity. Sexual violence includes sexual assault, rape, battery, and sexual coercion; domestic violence; dating violence; and stalking.

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

Domestic Violence is defined as abuse committed against an adult or a minor who is a spouse or former spouse, cohabitant or former cohabitant, or someone with whom the abuser has a child, has an existing dating or engagement relationship, or has had a former dating or engagement relationship.

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

Sexual Assault occurs when physical sexual activity is engaged without the consent of the other person or when the other person is unable to consent to the activity. The activity or conduct may include physical force, violence, threat, or intimidation, ignoring the objections of the other person, causing the other person's intoxication or incapacitation through the use of drugs or alcohol, or taking advantage of the other person's incapacitation (including voluntary intoxication).

Consent is *informed*. Consent is an affirmative, unambiguous, and conscious decision by each participant to engage in mutually agreed-upon sexual activity.

Consent is *voluntary*. It must be given without coercion, force, threats, or intimidation. Consent means positive cooperation in the act or expression of intent to engage in the act pursuant to an exercise of free will.

Consent is *revocable*. Consent to some form of sexual activity does not imply consent to other forms of sexual activity. Consent to sexual activity on one occasion is not consent to engage in sexual activity on another occasion. A current or previous dating or sexual relationship, by itself, is not sufficient to constitute consent. Even in the context of a relationship, there must be mutual consent to engage in sexual activity. Consent must be ongoing throughout a sexual encounter and can be revoked at any time. Once consent is withdrawn, the sexual activity must stop immediately.

Consent cannot be given when a person is *incapacitated*. A person cannot consent if s/he is unconscious or coming in and out of consciousness. A person cannot consent if s/he is under the threat of violence, bodily injury or other forms of coercion.

A person cannot consent if his/her understanding of the act is affected by a physical or mental impairment. For purposes of this Policy, **the age of consent** is consistent with Florida Penal Code Section § 794.05.

Incapacitation is defined as the physical and/or mental inability to make informed, rational judgments. States of incapacitation include, but are not limited to, unconsciousness, sleep, and blackouts. Where alcohol or drugs are involved, incapacitation is defined with respect to how the alcohol or other drugs consumed affects a person's decision-making capacity, awareness of consequences, and ability to make fully informed judgments. Being intoxicated by drugs or alcohol does not diminish one's responsibility to obtain consent. The factors to be considered when determining whether consent was given include whether the accused knew, or whether a reasonable person should have known, that the complainant was incapacitated.

Stalking is behavior in which a person repeatedly engages in conduct directed at a specific person that places that person in reasonable fear of his or her safety or the safety of others.

Bystander Intervention: A bystander is someone other than the victim who is present when an act of dating violence, domestic violence, stalking, or sexual assault is occurring or when a situation is occurring in which a reasonable person feels as though some protective action is required to prevent sexual assault, dating violence, domestic violence, or stalking. Bystanders, if active, can prevent harm or intervene before a situation gets worse.

Awareness Program The VAWA Sexual Harassment and Sexual Violence Awareness program is a program designed to increase knowledge of sexual assault, sexual harassment, and sexual violence, and to describe techniques that can be used to increase personal safety. This awareness program is available to School Students, Employees, and vendors at: <https://www.orioncollege.org/wp-content/uploads/2014/01/Awareness-Program.pdf>. The program is ongoing and continuously updated.

Primary Prevention Program: Provides information on reducing the risk of being sexually assaulted or becoming a perpetrator, in addition other pertinent information. The primary prevention program is located at: <https://www.orioncollege.org/wp-content/uploads/2014/01/Awareness-Program.pdf>

Ongoing Prevention and Awareness Campaigns: Our primary Awareness Program provides information on risk reduction to prevent sexual crimes. The program is continuously updated on the school's main site.

Risk Reduction: Strategies outlined in the Awareness Program to help reduce the incidence of Sexual Harassment and Sexual Violence among the College's community.

Executive Officer: The College President

III. POLICY TEXT

A. General

The College prohibits sexual harassment and sexual violence. Such behavior violates both law and College policy. The College will respond promptly and effectively to reports of sexual harassment and sexual violence and will take appropriate action to prevent, to correct, and when necessary, to discipline behavior that violates this *Policy*.

B. Prohibited Acts

This *Policy* prohibits sexual harassment and sexual violence as defined in Section II. Conduct by an

employee that is sexual harassment or sexual violence in violation of this *Policy* is considered to be outside the course and scope of employment.

C. Consensual Relationships

This *Policy* covers unwelcome conduct of a sexual nature. Consensual romantic relationships between members of the College community are subject to other College policies. For example, policies governing employee-student relationships are outlined in the Employee Handbook. While romantic relationships between members of the College community may begin as consensual, they may evolve into situations that lead to charges of sexual harassment or sexual violence.

D. Gender Identity, Gender Expression, or Sexual Orientation Discrimination

Harassment that is not sexual in nature but is based on gender, gender identity, gender expression, sex- or gender-stereotyping, or sexual orientation also is prohibited by the College's nondiscrimination policies if it denies or limits a person's ability to participate in or benefit from College educational programs, employment, or services. While discrimination based on these factors may be distinguished from sexual harassment, these types of discrimination may contribute to the creation of a hostile work or academic environment. Thus, in determining whether a hostile environment due to sexual harassment exists, the College may take into account acts of discrimination based on gender, gender identity, gender expression, sex- or gender- stereotyping, or sexual orientation.

E. Retaliation

This *Policy* prohibits retaliation against a person who reports sexual harassment or sexual violence, assists someone with a report of sexual harassment or sexual violence, or participates in any manner in an investigation or resolution of a sexual harassment or sexual violence report. Retaliation includes threats, intimidation, reprisals, and/or adverse actions related to employment or education.

F. Dissemination of the Policy, Educational Programs, and Employee Training

As part of the College's commitment to providing a working and learning environment free from sexual harassment and sexual violence, this *Policy* shall be disseminated widely to the College community through publications, websites, employee orientations, and other appropriate channels of communication. The locations shall make preventive educational materials available to all members of the College community to promote compliance with this *Policy* and familiarity with local procedures. The locations shall designate College employees responsible for reporting sexual harassment and sexual violence and make available prevention training to designated employees. In addition, the College will provide annual training to investigators and hearing officers. Each location shall post a copy of this *Policy* in a prominent place on its website (See Section V. Procedures).

G. Reporting Sexual Harassment or Sexual Violence

Any member of the College community may report conduct that may constitute sexual harassment or sexual violence to any supervisor, manager, or Title IX Officer (*Sexual Harassment Officer*). Supervisors, managers, and other designated employees are responsible for promptly forwarding such reports to the Title IX Officer (*Sexual Harassment Officer*) or other local official designated to review and investigate sexual harassment and sexual violence complaints. Any manager, supervisor, or designated employee responsible for reporting or responding to sexual harassment or sexual violence who knew about the incident and took no action to stop it or failed to report the prohibited act may be subject to disciplinary action.

The school shall identify confidential resources with whom members of the College community can

consult for advice and information regarding making a report of sexual harassment or sexual violence. Requests regarding the confidentiality of reports of sexual harassment or sexual violence will be considered in determining an appropriate response; however, such requests will be considered in the dual contexts of the College's obligation to ensure a working and learning environment free from sexual harassment and sexual violence and the due process rights of the accused to be informed of the allegations and their source. Also, an individual may file a complaint or grievance alleging sexual harassment or sexual violence under the applicable College complaint resolution or grievance procedures.

H. Response to Reports of Sexual Harassment or Sexual Violence

The College shall provide prompt and effective response to reports of sexual harassment or sexual violence, which may include Early Resolution, Formal Investigation, and/or targeted prevention training or educational programs.

If an individual reports to the College that the individual has been a victim of domestic violence, dating violence, sexual assault, or stalking, s/he shall be provided with a written explanation of the individual's rights and options whether the offense occurred on- or off-campus or on any College location.

Upon a finding of sexual harassment or sexual violence, the College may offer remedies to the individual or individuals harmed by the harassment and/or violence consistent with applicable complaint resolution and grievance procedures (*See Student Handbook; School Catalog; Employee Handbook*). Such remedies may include counseling, an opportunity to repeat course work without penalty, changes to student housing assignments, or other appropriate interventions, such as changes in academic, living, transportation, or working situations.

Any member of the College community who is found to have engaged in sexual harassment or sexual violence is subject to disciplinary action including dismissal in accordance with the applicable College disciplinary procedure (*Student Handbook/Employee Handbook*) or other College policy. Generally, disciplinary action will be recommended when the conduct is sufficiently severe, persistent, or pervasive that it alters the conditions of employment or limits the opportunity to participate in or benefit from educational programs.

I. Free Speech and Academic Freedom

As participants in the College, the faculty and other academic appointees, staff, and students of the College enjoy significant free speech protections guaranteed by the First Amendment of the United States Constitution and Article I, Section 4 of the Florida Constitution. This *Policy* is intended to protect members of the College community from discrimination, not to regulate protected speech. This *Policy* shall be implemented in a manner that recognizes the importance of rights to freedom of speech and expression. The College also has interest in free inquiry and the collective search for knowledge and thus recognizes principles of academic freedom as a special area of protected speech. Consistent with these principles, no provision of this *Policy* shall be interpreted to prohibit conduct that is legitimately related to the course content, teaching methods, scholarship, or public commentary of an individual faculty member or the educational, political, artistic, or literary expression of students in classrooms and public forums. However, freedom of speech and academic freedom are not limitless and do not protect speech or expressive conduct that violates federal or state anti-discrimination laws.

J. Additional Enforcement Information

The federal Equal Employment Opportunity Commission (EEOC) and the U.S. Department of labor investigate complaints of unlawful harassment, including sexual violence, in employment. The U.S. Department of Education Office for Civil Rights (OCR) investigates complaints of unlawful harassment and sexual violence by students in educational programs or activities. These agencies may serve as neutral fact finders and attempt to facilitate the voluntary resolution of disputes with the parties. For more information, contact the nearest office of the EEOC, USDOL or OCR.

IV. COMPLIANCE / RESPONSIBILITIES

A. Implementation of the Policy

The *Title IX Officer* has the authority to develop procedures or other supplementary information to support the implementation of this *Policy*. The *Title IX Officer* may apply appropriate and consistent interpretations to clarify the *Policy* provided that the interpretations do not result in substantive changes to the *Policy*.

The *Executive Officer* at each location is authorized to establish and is responsible for local procedures to implement the *Policy*. Local procedures must be consistent with the *Policy*. Exceptions to procedures required by the *Policy* must be approved by the *Executive Officer*.

The *Executive Officer* and The *Title IX Officer* are authorized to determine responsibilities and authorities at secondary administrative levels to establish local procedures necessary to implement the *Policy*.

B. Revisions to the Policy

The *Executive Officer* approves the *Policy* and has the authority to approve revisions upon recommendation by the *Title IX Officer*.

The *Title IX Officer* has the authority to initiate revisions to the *Policy* consistent with approval authorities and applicable Bylaws, Standing Orders, and Policies of The Regents.

OC's President/*Executive Office* has the authority to ensure that the *Policy* is reviewed regularly and updated in a manner that is consistent with other College policies.

C. Approval of Actions

Actions within the *Policy* must be approved in accordance with local procedures.

D. Compliance with the Policy

The *Executive Officer* will designate the local management office responsible for monitoring, enforcing, and reporting *Policy* compliance.

The *Director of Compliance/Title IX Officer* will periodically audit and monitor compliance with the *Policy*.

V. PROCEDURES

A. School Responsibilities

In accordance with state and federal law, the school shall:

- Offer sexual harassment prevention training and education to the College community, and consistent with Florida Government Code, provide sexual harassment prevention training and education to each supervisory employee;

- Offer prevention education programs to all incoming students and new employees, and ongoing prevention and awareness campaigns to the College community, to promote awareness of rape and acquaintance rape, domestic violence, dating violence, sexual assault, and stalking, including the definition of consent, options for bystander intervention, and risk reduction awareness information;
- Offer annual training on issues related to sexual violence, as defined in this Policy, for individual conducting formal investigations of reports or conducting hearings;
- Provide all members of the College community with a process for reporting sexual harassment or sexual violence in accordance with the *Policy*;
- Identify on- and off-campus resources for reporting sexual harassment or sexual violence, including law enforcement, medical, and victim support services;
- Provide prompt and effective response to reports of sexual harassment, sexual violence, or reports of retaliation related to reports of sexual harassment or sexual violence in accordance with the *Policy*;
- Provide written notification as outlined in Section V.B.1 of the *Policy*; and
- Designate trained individuals, including, or other than, the Title IX Officers (Sexual Harassment Officers) to serve as resources for members of the College community who have questions or concerns regarding behavior that may be sexual harassment or sexual violence.

Title IX Officers (Sexual Harassment Officers)

Each location shall designate a Title IX Officer(s) (Sexual Harassment Officer (s)). The names and contact information for the Title IX Officers (Sexual Harassment Officers) and any designated trained sexual harassment or sexual violence advisors shall be posted with the *Policy* and local procedures on the location's website and be readily accessible to the College community. The responsibilities of the Title IX Officers (Sexual Harassment Officers) include, but may not be limited to, the duties listed below:

- (a) Coordinate with other responsible units to ensure that local sexual harassment and sexual violence prevention education and training programs are offered and provided as required by the *Policy*;
- (b) Disseminate the *Policy* widely to the College community;
- (c) Provide educational materials to promote compliance with the *Policy* and familiarity with local reporting procedures;
- (d) Train College employees responsible for reporting or responding to reports of sexual harassment;
- (e) Provide prompt and effective response to reports of sexual harassment or sexual violence in accordance with the *Policy*;
- (f) Maintain records of reports of sexual harassment and sexual violence at the location and actions taken in response to reports, including records of investigations, voluntary resolutions, and disciplinary action, as appropriate; and
- (g) Identify and address any patterns or systemic problems that arise during the review of sexual harassment and sexual violence complaints.

B. Procedures for Reporting and Responding to Reports of Sexual Harassment or Sexual Violence

All members of the College community are encouraged to contact the Title IX Officers (Sexual Harassment Officers) if they observe or encounter conduct that may be subject to the *Policy*. This includes conduct by employees, students, or third parties. Reports of sexual harassment or sexual violence may be brought to the Title IX Officers (Sexual Harassment Officers), or to any manager, supervisor, or other designated employee responsible for responding to reports of sexual harassment or sexual violence. If the person to whom harassment normally would be reported is the individual accused of harassment, reports may be made to another manager, supervisor, or designated employee. Managers, supervisors, and designated employees are required to notify the Title IX Officer (Sexual Harassment Officer) or other appropriate official designated to review and investigate sexual harassment complaints when a report is received.

Reports of sexual harassment or sexual violence should be brought forward as soon as possible after the alleged conduct occurs. While there is no stated timeframe for reporting, prompt reporting will better enable the College to respond to the report, determine the issues, and provide an appropriate remedy and/or action. All incidents should be reported even if a significant amount of time has passed. However, delaying a report may impede the College's ability to conduct an investigation and/or to take appropriate remedial actions.

1. Required Notifications for Reports of Sexual Violence

The College will provide a written explanation of available rights and options, including procedures to follow, when the College receives a report that a student or employee has been a victim of domestic violence, dating violence, sexual assault, or stalking, whether the offense occurred on- or off-campus or in connection with any College program. The written information shall include:

- (a) to whom the alleged offense should be reported;
- (b) options for reporting to law enforcement and campus authorities, including the option to notify local or on-campus law enforcement authorities; the right to be assisted by campus authorities in notifying law enforcement authorities if the complainant so chooses and the right to decline to notify such authorities;
- (c) the rights of complainants regarding orders of protection, no contact orders, restraining orders, or similar lawful orders issued by criminal or civil courts and the College's responsibilities regarding such orders;
- (d) the importance of preserving evidence as may be necessary to prove criminal domestic violence, dating violence, sexual assault, or stalking, or to obtain a protection order;
- (e) existing campus and community services available for victims including counseling, health, mental health, victim advocacy, legal assistance, and other services;
- (f) options for, and available assistance to, change academic, living, transportation, and working situations, if requested by the complainant and if reasonably available, regardless of whether the victim chooses to report the crime to campus police or local law enforcement;
- (g) Any applicable procedures for institutional disciplinary action.

2. Options for Resolution

Individuals reporting sexual harassment or sexual violence shall be informed about options for resolving potential violations of the *Policy*. These options shall include procedures for Early Resolution, procedures for Formal Investigation, and filing complaints or grievances under applicable College complaint resolution or grievance procedures. Individuals making reports also shall be informed about policies applying to confidentiality of reports under this *Policy* (see Section V.G below). Locations shall respond to the greatest extent possible to reports of sexual harassment and sexual violence brought anonymously or brought by third parties not directly involved in the asserted offenses. However, the response to such reports may be limited if information contained in the report cannot be verified by independent facts.

Individuals reporting sexual harassment and sexual violence shall be informed about the range of possible outcomes of the report, including interim protections, remedies for the individual harmed by the incident, and disciplinary actions that might be taken against the accused as a result of the report, including information about the procedures leading to such outcomes.

An individual who is subjected to retaliation (e.g., threats, intimidation, reprisals, or adverse employment or educational actions) for having made a report of sexual harassment or sexual violence in good faith, who assisted someone with a report of sexual harassment or sexual violence, or who participated in any manner in an investigation or resolution of a report of sexual harassment or sexual violence, may make a report of retaliation under these procedures. The report of retaliation shall be subject to the procedures in Section V.B.3 and Section V.B.4 below.

3. Procedures for Early Resolution

The goal of Early Resolution is to resolve concerns at the earliest stage possible with the cooperation of all parties involved. Locations are encouraged to utilize Early Resolution options when the parties desire to resolve the situation cooperatively and/or when a Formal Investigation is not likely to lead to a satisfactory outcome. Participation in the Early Resolution process is voluntary. Early Resolution may include an inquiry into the facts, but typically does not include a formal investigation.

Means for Early Resolution shall be flexible and encompass a full range of possible appropriate outcomes. Early Resolution includes options such as mediating an agreement between the parties, separating the parties, referring the parties to counseling programs, negotiating an agreement for disciplinary action, conducting targeted preventive educational and training programs, or providing remedies for the individual harmed by the offense. Early Resolution also includes options such as discussions with the parties, making recommendations for resolution, and conducting a follow-up review after a period of time to assure that the resolution has been implemented effectively.

Early Resolution may be appropriate for responding to anonymous reports and/or third party reports. Steps taken to encourage Early Resolution and agreements reached through Early Resolution efforts should be documented.

While the College encourages Early Resolution of a complaint, the College does not require that parties participate in Early Resolution prior to the College's decision to initiate a Formal Investigation. Some reports of sexual harassment or sexual violence may not be appropriate for mediation but may require a Formal Investigation at the discretion of the Title IX Officer (Sexual Harassment Officer) or other appropriate official designated to review and investigate sexual harassment complaints. The College will not compel a complainant to engage in mediation. Mediation, even if voluntary, may not be used in cases involving sexual violence.

4. *Procedures for Formal Investigation*

In cases where Early Resolution is inappropriate or in cases where Early Resolution is unsuccessful, the location may conduct a Formal Investigation. In such cases, the individual making the report may be encouraged to file a written request for Formal Investigation. The wishes of the individual making the request shall be considered, but are not determinative, in the decision to initiate a Formal Investigation of a report of sexual harassment or sexual violence. In cases where there is no written request, the Title IX Officer (Sexual Harassment Officer) or other appropriate official designated to review and investigate sexual harassment complaints, potentially in consultation with the administration, may initiate a Formal Investigation after making a preliminary inquiry into the facts.

In cases where a complainant states he or she does not want to pursue a Formal Investigation, the Title IX Officer (Sexual Harassment Officer) should inform the complainant that the ability to investigate may be limited. When determining whether to go forward with a Formal Investigation, the Title IX Officer (Sexual Harassment Officer) may consider: 1) the seriousness of the allegation, 2) in the case of a student complainant, the age of the student, 3) whether there have been other complaints or reports against the accused, and 4) the rights of the accused individual to receive information about the complainant and the allegations if formal proceedings with sanctions may result from the investigation. Even if a complainant does not want to pursue an investigation, under some circumstances, the Title IX Officer (Sexual Harassment Officer) may have an obligation to investigate a complaint, such as when there is a risk to the campus community if the accused remains on campus. The complainant should be made aware of this independent obligation to investigate the complaint.

(a) In order to provide a prompt, fair, and impartial investigation and resolution, any Formal Investigation of reports of sexual harassment and/or sexual violence shall incorporate the following standards:

i. The individual(s) accused of conduct violating the *Policy* shall be provided a copy of the written request for Formal Investigation or otherwise given a full and complete written statement of the allegations, and a copy of the *Policy*; and

ii. The individual(s) conducting the investigation shall be familiar with the *Policy*, have training or experience in conducting investigations, and as relevant to the investigation, be familiar with policies and procedures specific to students, staff, faculty, academic appointees, and visitors. For cases involving allegations of sexual violence, the individual(s) conducting the investigation must receive annual training on issues related to sexual violence. Such training includes how to conduct an investigation that protects the safety of the complainants and promotes accountability.

(b) If the alleged conduct is also the subject of a criminal investigation, the campus may not wait for the conclusion of the criminal investigation to begin an investigation pursuant to this *Policy*. However, a campus may need to coordinate its fact-finding efforts with the police investigation. Once notified that the police department has completed its gathering of evidence (not the ultimate outcome of the investigation or the filing of any criminal charges), the campus must promptly resume and complete its fact-finding for the sexual harassment or sexual violence investigation.

(c) The investigation generally shall include interviews with the parties if available, interviews with other witnesses as needed, and a review of relevant documents as appropriate. Disclosure of facts to parties and witnesses shall be limited to what is reasonably necessary to conduct a fair and thorough investigation. Participants in an investigation shall be advised that maintaining confidentiality is essential to protect the integrity of the investigation.

(d) The investigator shall apply a preponderance of evidence standard to determine whether there has been a violation of this *Policy*.

(e) Upon request, the complainant and the accused may each have a representative present when he or she is interviewed, and at any subsequent proceeding or related meeting. Other witnesses may have a representative present at the discretion of the investigator or as required by applicable College policy or collective bargaining agreement.

(f) At any time during the investigation, the investigator may recommend that interim protections or remedies for the parties or witnesses be provided by appropriate College officials. These protections or remedies may include separating the parties, placing limitations on contact between the parties, or making alternative working or student housing arrangements. Failure to comply with the terms of interim protections may be considered a separate violation of this *Policy*.

(g) The investigation shall be completed as promptly as possible and in most cases within 60 working days of the date the request for formal investigation was filed. This deadline may be extended on approval by a designated College official.

(h) Generally, an investigation results in a written report that at a minimum includes a statement of the allegations and issues, the positions of the parties, a summary of the evidence, findings of fact, and a determination by the investigator whether this *Policy* has been violated. The report also may contain a recommendation for actions to resolve the complaint, including preventive educational programs, remedies for the complainant, and a referral to disciplinary procedures as appropriate. The report is submitted to a designated College official with authority to implement the actions necessary to resolve the complaint. The report may be used as evidence in other related procedures, such as subsequent complaints, grievances and/or disciplinary actions.

(i) The complainant shall be informed if there were findings made that the *Policy* was or was not violated and of actions taken to resolve the complaint, if any, that are directly related to the complainant, such as an order that the accused not contact the complainant. In accordance with College policies protecting individuals' privacy, the complainant may generally be notified that the matter has been referred for disciplinary action, but shall not be informed of the details of the recommended disciplinary action without the consent of the accused.

(j) The complainant and the accused may request a copy of the investigative report pursuant to College policy governing privacy and access to personal information.³ However, in accordance with College policy, the report shall be redacted to protect the privacy of personal and confidential information regarding all individuals other than the individual requesting the report.

(k) At the conclusion of any disciplinary proceeding arising from an allegation of domestic violence, dating violence, sexual assault or stalking, the complainant and the accused will be simultaneously informed in writing of:

- i. The outcome of any College disciplinary proceeding;
- ii. The College's procedures for appealing the results of the proceeding;
- iii. Any change to the results that occur prior to the time that such results become final; and
- iv. When results become final.

C. Complaints or Grievances Involving Allegations of Sexual Harassment or Sexual Violence

An individual who believes he or she has been subjected to sexual harassment or sexual violence may file

a complaint or grievance instead of, or in addition to, making a report of sexual harassment to the Title IX Officer (Sexual Harassment Officer) or other appropriate official designated to review and investigate sexual harassment and sexual violence complaints under this *Policy*. A complaint or grievance alleging sexual harassment or sexual violence must meet all the requirements under the applicable complaint resolution or grievance procedure, including time limits for filing.

If a complaint or grievance alleging sexual harassment or sexual violence is filed in addition to a report made to the Title IX Officer (Sexual Harassment Officer) or other appropriate official designated to review and investigate sexual harassment complaints under this *Policy*, the complaint or grievance shall be held in abeyance subject to the requirements of any applicable complaint resolution or grievance procedure, pending the outcome of the Early Resolution or Formal Investigation procedures. If the individual wishes to proceed with the complaint or grievance, the Early Resolution or Formal Investigation shall constitute the first step or steps of the applicable complaint resolution or grievance procedure.

An individual who has made a report of sexual harassment or sexual violence also may file a complaint or grievance alleging that the actions taken in response to the report of sexual harassment or sexual violence did not follow *Policy*. Such a complaint or grievance may not be filed to address a disciplinary sanction imposed upon the accused. Any complaint or grievance regarding the resolution of a report of sexual harassment or sexual violence must be filed in a timely manner. The time period for filing begins on the date the individual was notified of the outcome of the sexual harassment or sexual violence investigation or other resolution process pursuant to this *Policy*, and/or of the actions taken by the administration in response to the report of sexual harassment or sexual violence, whichever is later.

D. Remedies and Referral to Disciplinary Procedures

Findings of *Policy* violations may be considered to determine remedies for individuals harmed by the sexual harassment or sexual violence and shall be referred to applicable local disciplinary procedures. Procedures under this *Policy* shall be coordinated with applicable local complaint resolution, grievance, and disciplinary procedures to avoid duplication in the fact-finding process whenever possible. Violations of the *Policy* may include engaging in sexual harassment or sexual violence, retaliating against a complainant reporting sexual harassment or sexual violence, or violating interim protections. Investigative reports made pursuant to this *Policy* may be used as evidence in subsequent complaint resolution, grievance, and disciplinary proceedings as permitted by the applicable procedures.

E. Privacy

The College shall protect the privacy of individuals involved in a report of sexual harassment or sexual violence to the extent permitted by law and College *Policy*. A report of sexual harassment or sexual violence may result in the gathering of extremely sensitive information about individuals in the College community. While such information is considered confidential, College policy regarding access to public records and disclosure of personal information may require disclosure of certain information concerning a report of sexual harassment or sexual violence. In such cases, every effort shall be made to redact the records in order to protect the privacy of individuals. An individual who has made a report of sexual harassment or sexual violence may be advised of sanctions imposed against the accused when the individual needs to be aware of the sanction in order for it to be fully effective (such as restrictions on communication or contact with the individual who made the report). In addition, when the offense involves a crime of violence or a non-forcible sex offense, the Family Educational Rights and Privacy Act permits disclosure to the complainant the final results of a disciplinary proceeding against the alleged accused, regardless of whether the College concluded that a violation was committed. Information regarding disciplinary action taken against the accused shall not be disclosed without the accused's consent, unless permitted by law as noted above, or unless it is necessary to ensure compliance with the action or the safety of individuals.

F. Confidentiality of Reports of Sexual Harassment and Sexual Violence

Each location shall identify confidential resources with whom members of the College community can consult for advice and information regarding making a report of sexual harassment or sexual violence. These resources provide individuals who may be interested in bringing a report of sexual harassment or sexual violence with a safe place to discuss their concerns and learn about the procedures and potential outcomes involved. These resources shall be posted on the location's website. Confidential resources include campus ombudspersons and/or licensed counselors in employee assistance programs or student counseling centers. Individuals who consult with confidential resources shall be advised that their discussions in these settings are not considered reports of sexual harassment or sexual violence and that without additional action by the individual, the discussions will not result in any action by the College to resolve their concerns.

The locations shall notify the College community that certain College employees, such as the Title IX Officer (Sexual Harassment Officer), managers, supervisors, and other designated employees have an obligation to respond to reports of sexual harassment or sexual violence, even if the individual making the report requests that no action be taken. An individual's requests regarding the confidentiality of reports of sexual harassment or sexual violence will be considered in determining an appropriate response; however, such requests will be considered in the dual contexts of the College's legal obligation to ensure a working and learning environment free from sexual harassment and sexual violence and the due process rights of the accused to be informed of the allegations and their source. Some level of disclosure may be necessary to ensure a complete and fair investigation, although the College will comply with requests for confidentiality to the extent possible.

G. Retention of Records Regarding Reports of Sexual Harassment and Sexual Violence

The office of the Title IX Officer (*Sexual Harassment Officer*) is responsible for maintaining records relating to sexual harassment and sexual violence reports, investigations, and resolutions. Records shall be maintained in accordance with College records policies. All records pertaining to pending litigation or a request for records shall be maintained in accordance with instructions from legal counsel.

VI. RELATED INFORMATION

School Catalog –

<http://www.orioncollege.org/wp-content/uploads/2014/01/Catalog.pdf>

Student Handbook –

<http://www.orioncollege.org/wp-content/uploads/2014/01/Student-Handbook.pdf>

REPORTING, SUPPORT, AND TREATMENT RESOURCES

Students, faculty or employees who wish to report an incident should contact one of the following *Title IX Officers*:

- Carolina Bodner, Director of Compliance & Curriculum Development, Title IX Officer
954-491-7777 Ext. 124; carolinab@orioncollege.org
- Anne Fillette, Dean of Academics, Title IX Officer
954-491-7777 Ext. 131; annef@orioncollege.org

Orion College Complaint/Grievance Reporting and Resolution Directory:

http://www.orioncollege.org/students/complaint_resolution/

Students, faculty or employees who wish to receive further counseling are encouraged to contact the following organizations for additional help:

The National Domestic Violence: 1-800-799-7233 / 1-800-787-3224 (TTY)

<http://www.thehotline.org/>

Rape, Abuse & Incest National Network Assault Hotline: 1-800-656-HOPE(4673)

<http://www.rainn.org/get-help/national-sexual-assault-hotline>

National Institute of Mental Health – <http://www.nimh.nih.gov/index.shtml>

A list of additional emergency resources is also available from the Department of Student Services & Career Development or the Business Office Manager.

Emergency Notification, Response, and Evacuation

Policy

In compliance with HEA and Clery Act guidelines, OC will maintain and distribute an emergency response and notification procedure; conduct a yearly test of the emergency response and evacuation procedure; and document for each test a description of the exercise, the date, whether it was announced, and the time. This information will come in the form of the Emergency Notification, Response and Evacuation sections of the Orion College Clery Act Disclosure of Campus Security Policy and Campus Crime Statistics Report, and appropriate addenda will be added each year regarding the results of the testing. All of this can be found on the Student Consumer Information page-

http://orioncollege.org/students/consumer_information

The location of this reporting will be announced on or before October 1st each calendar year in the form of the Notice of Availability of Institutional and Financial Aid Information, distributed to current employees and students via email and made available to all applicant students and employees at their request or during matriculation and orientation.

Notification Procedures

Immediately upon confirmation of a significant emergency or dangerous situation involving an imminent threat to the health or safety of students and/or employees occurring on campus, or the surrounding area such that it presents a clear conflict with OC's policy of safety regarding students and staff, a multifaceted notification system is engaged, including:

- Student and faculty-wide announcements in the ANGEL learning management system
- Mass email to all students, faculty, and staff
- Internal memo to all employees via collocated mail server
- Mass notification via text-message to employees
- If necessary, Campus Security Authorities will designate a messenger to notify all on-campus parties in person

Emergency Recognition and Response Process

An Emergency is reported

A. Confirm the nature of the emergency: Executive Response Committee members will convene and confirm the nature of the crisis through internal assessments or by opening a line of communication with local and state law enforcement.

B. Determine the appropriate notification scope: Executive Response Committee members will formulate an information dissemination plan, contingent upon the ongoing nature of the threat, and immediately notify Campus Security Authorities.

C. Determine notification content: If an announcement to employees, faculty, and students is deemed appropriate by Executive Response Committee, a content template will be formulated.

D. Initiating Notification: Once a content template is created, the Executive Response Committee will disseminate it to all appropriate CSAs and/or department directors, who are educated in the appropriate measures for contacting the students, faculty, and staff they are responsible for, as stated in the Emergency Response Plan.

OC 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 the victim, contain, respond to or otherwise mitigate the emergency.

Emergency Response Team

In the event that a crisis is reported, all employees are instructed to report the facts to members of the Executive Response Committee. These include board members, school directors and security personnel. Other persons may be added to the core team, as necessary, to formulate a response based on the nature of the crisis.

Response

Executive Response Committee members are charged with assessing the nature and severity of the crisis. Emergencies which do not pose an imminent danger to faculty, staff, students, or the greater community are appraised and reported on by informing each designated Campus Security Authority, each of whom are trained on crisis notification procedures, and the Emergency Notification Process is initiated if necessary. Emergencies which pose an imminent danger are confirmed, as necessary, with state and local authorities. If an emergency is deemed severe enough, the campus is either locked down or evacuated, per the ruling of the Executive Response Committee and advice from law enforcement agencies as necessary. In this event, the Emergency Notification Process is initiated.

Those dangers which pose a threat to the greater community will be promptly reported to state and local authorities, including but not limited to: law enforcement, fire-rescue, animal or chemical control, etc. In this event, the Emergency Notification Process is initiated unless otherwise instructed by authorities.

Evacuation Procedures

In the event that local authorities and/or the Executive Response Committee initiate an evacuation order, the Business Office Manager will coordinate with all department directors and deans to follow the Evacuation Protocol. Protocol establishes that each Department Director is responsible for assuring all team members are led to the designated checkpoint, established by the Evacuation Protocol and Executive Response Committee directive. Likewise, Deans are responsible for assuring all active instructors and present students are accounted for and led to the designated checkpoint. The Executive Response Committee and OC Security officers will coordinate the evacuation of all assembled staff, faculty, and students from the building.

Emergency evacuation routes are posted in hallways, offices, classrooms, restrooms, all public areas, and near both exits. Anyone requiring physical assistance will be aided by a member of the OC security staff or Executive Response Committee member or designee. After exiting, evacuated parties are instructed to head immediately away from the building and parking lot. Do not reenter building until emergency or security personnel have cleared the area for re-entry.

Relationships with Local and State Police

OC is located in the city of Plantation, in Broward County Florida. The school maintains a close working relationship with the Plantation police department, with periodic contact initiated by school personnel, to ensure that OC is aware of criminal offenses and arrests occurring on or near the campus.

Timely Warnings

OC will alert the campus community regarding any Clery Act crime that is reported to campus security authorities (including designated CSAs, Executive Response Committee members, or security officers) or local police agencies, and is considered to represent a serious or continuing threat to students and employees.

Timely warnings are issued by the Executive Response Committee or a department head designated as such. These timely warning can be disseminated in one or more ways, as described in the **Notifications Procedures** outline.

OC cooperates and operates in conjunction with local law enforcement, as described in the **Relationship with Local and State Police** outline.

Information regarding registered sex offenders

Information regarding registered sex offenders is made available to the public under section 170101 (j) of the Violent Criminal Control and Law Enforcement Act of 1994. This information may be obtained from the Florida Department of Law Enforcement by visiting their website at- www.fdle.state.fl.us

Crime Statistic Report

Criminal Offense - ON CAMPUS**			
	2013	2014	2015
Murder/Non-negligent manslaughter	0	0	0
Negligent manslaughter	0	0	0
Sex offenses - Forcible	0	0	0
Sex offenses - Non-forcible	0	0	0
Incest	0	0	0
Stalking	0	0	0
Sexual Assault	0	0	0
Dating Violence	0	0	0
Statutory rape	0	0	0
Robbery	0	0	0
Aggravated assault	0	0	0
Burglary	0	0	0
Motor vehicle theft	0	0	0
Arson	0	0	0
Domestic Violence	x	0	0
Totals	0	0	0

Criminal offenses which were not required to be collected or reported in the years indicated are denoted by an "x"

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Criminal Offense – PUBLIC PROPERTY**			
	2013	2014	2015
Murder/Non-negligent manslaughter	0	0	0
Negligent manslaughter	0	0	0
Sex offenses – Forcible	0	0	0
Sex offenses - Non-forcible	0	0	0
Incest	0	0	0
Stalking	0	0	0
Sexual Assault	0	0	0
Dating Violence	0	0	0
Statutory rape	0	0	0
Robbery	0	0	0
Aggravated assault	0	0	0
Burglary	0	0	0
Motor vehicle theft	0	0	0
Arson	0	0	0
Domestic Violence	0	0	0
Totals	0	0	0

Criminal offenses which were not required to be collected or reported in the years indicated are denoted by an “x”

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Hate Crimes – ON CAMPUS	Total By Year			Category of Bias for Crimes Reported in 2015								
	Criminal Offense	2013	2014	2015	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
Murder/ Non-negligent manslaughter	0	0	0	0	0	0	0	0	0	0	0	0
Negligent manslaughter	0	0	0	0	0	0	0	0	0	0	0	0
Sex offenses - Forcible	0	0	0	0	0	0	0	0	0	0	0	0
Sex offenses - Non-forcible	0	0	0	0	0	0	0	0	0	0	0	0
Stalking	0	0	0	0	0	0	0	0	0	0	0	0
Sexual Assault	0	0	0	0	0	0	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0	0	0	0	0	0	0
Domestic Violence	0	0	0	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0	0	0	0
Statutory rape	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0	0	0	0
Aggravated assault	0	0	0	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0
Motor vehicle theft	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0
Simple assault	0	0	0	0	0	0	0	0	0	0	0	0
Larceny-theft	0	0	0	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalism of property	0	0	0	0	0	0	0	0	0	0	0	0

Criminal offenses which were not required to be collected or reported in the years indicated are denoted by an “x”

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Hate Crimes – Public Property	Total By Year			Category of Bias for Crimes Reported in 2015							
	2013	2014	2015	Race	Religion	Sexual Orientation	Gender Identity	Gender	Disability	Ethnicity	National Origin
Criminal Offense											
Murder/ Non-negligent manslaughter	0	0	0	0	0	0	0	0	0	0	0
Negligent manslaughter	0	0	0	0	0	0	0	0	0	0	0
Sex offenses - Forcible	0	0	0	0	0	0	0	0	0	0	0
Sex offenses - Non-forcible	0	0	0	0	0	0	0	0	0	0	0
Stalking	0	0	0	0	0	0	0	0	0	0	0
Sexual Assault	0	0	0	0	0	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0	0	0	0	0	0
Domestic Violence	0	0	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0	0	0
Statutory rape	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0	0	0
Aggravated assault	0	0	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0
Motor vehicle theft	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0
Simple assault	0	0	0	0	0	0	0	0	0	0	0
Larceny-theft	0	0	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalism of property	0	0	0	0	0	0	0	0	0	0	0

Criminal offenses which were not required to be collected or reported in the years indicated are denoted by an “x”

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Arrests - ON CAMPUS			
	2013	2014	2015
a. Weapons: carrying, possessing, etc	0	0	0
b. Drug abuse violations	0	0	0
c. Liquor law violations	0	0	0
Arrests - PUBLIC PROPERTY			
a. Weapons: carrying, possessing, etc	0	0	0
b. Drug abuse violations	0	0	0
c. Liquor law violations	0	0	0
Disciplinary Actions - ON CAMPUS			
a. Weapons: carrying, possessing, etc	0	0	0
b. Drug abuse violations	0	0	0
c. Liquor law violations	0	0	0
Disciplinary Actions - PUBLIC PROPERTY			
a. Weapons: carrying, possessing, etc	0	0	0
b. Drug abuse violations	0	0	0
c. Liquor law violations	0	0	0

All statistics are collected and subject to interpretation based on the Federal Bureau of Investigation Uniform Crime Report classification system and the Plantation City Police Department standards of crime statistic classification. For more information on crime statistic reporting and collection, contact your state or local law enforcement department.

Per the VAWA act revision in 2015, statistics for certain criminal offenses were not collected or reported prior to 2013. These statistics are denoted by an 'X'.

**Reporting is only available for the calendar years in which the College operated a physical campus*

***On-campus statistics reflect an aggregate of OC crime log data and law enforcement-furnished data*

****Public property statistics represent data collected solely from law-enforce or as reported directly to the College's campus Safety and Security representatives*