

# 2023 ANNUAL SECURITY & FIRE SAFETY REPORT

REPORT REFLECTS 2022 DATA FOR  
NORTHERN KENTUCKY UNIVERSITY  
MAIN CAMPUS (HIGHLAND HEIGHTS, KY) AND GRANT COUNTY CAMPUS



## Special Points of Interest:

Statistical Information on Clery Classified Crimes // Security & Access to Campus Facilities // Evacuation & Emergency Response Policies // Security Awareness & Crime Prevention Programs // Title IX Information



The information in this report is provided to meet the requirements of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act of 1998 (20 USC 1092 (f), 34 CFR Part 668.46), and the Michael Minger Act (KRS 164.948 to 164.9489; KRS 164.993).

This publication was prepared by Northern Kentucky University and printed with state funds (KRS 57.375). Northern Kentucky University is committed to building a diverse faculty and staff for employment and promotion to ensure the highest quality of work force and to foster an environment that embraces the broad range of human diversity.

The university is committed to equal employment opportunity, affirmative action, and eliminating discrimination. This commitment is consistent with an intellectual community that celebrates individual differences and diversity, as well as a matter of law.

Discrimination against any individual based upon protected status, which is defined as age, color, disability, gender, national origin, race, religion, sexual orientation, or veteran status, is prohibited. The university will provide equal opportunity to all employees in regard to salaries, promotions, benefits and working conditions and will monitor these areas to ensure that any differences which may exist are the result of bona fide policies and procedures and are not the result of illegal discrimination. **MC230184**

## CLERY ACT

In 1990, The Higher Education Act of 1965 (HEA) was amended to include the Crime Awareness and Campus Security Act of 1990 (Title II of Public Law 101-542). This amendment required all postsecondary institutions participating in the Title IV student financial aid programs to disclose campus crime statistics and security information. In 1998, the Act was renamed the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, or Clery Act—in memory of Jeanne Clery, a Lehigh University student who was raped and murdered in her dorm room in 1986.

On March 7, 2013, President Barack Obama signed a bill that strengthened and reauthorized the Violence Against Women Act (VAWA). Included in the bill were amendments to the Clery Act that afforded additional rights to victims/survivors of dating violence, domestic violence, sexual assault and stalking.

The Clery Act requires colleges and universities to draft and implement policies and procedures as well as disclose certain crime statistics. These requirements include:

- Developing policies and procedure regarding crime prevention, missing students, drug and alcohol use, reporting and preventing sexual assaults and issuing emergency notifications, among others
- Creating awareness programs for students and employees regarding dating violence, domestic violence, sexual assault and stalking
- Issuing timely warnings for Clery Act crimes that constitute a serious or continuing threat to the safety of students or employees
- Publishing the Annual Security and Fire Safety Report (ASR), which contains crime and fire statistics and statements of policy procedures
- Submitting crime and fire statistics to the Department of Education

Northern Kentucky University strives to provide a safe campus environment for students, faculty and staff in compliance with the Clery Act and other federal and state laws. Each year by Oct. 1, NKU publishes its ASR, which includes statements of policy and procedures relating to campus safety and security as well as crime and fire statistics. This report is prepared with the cooperation of multiple university departments. The ASR is intended to communicate important safety information to the campus community and to assist prospective students and employees in the decision making process of selecting a college or university by highlighting that NKU is a safe place to learn, live and work.

We urge members of the university to use this report as a guide for safe practices on and off campus. NKU sends an email to every enrolled student and current employee notifying that the ASR is available after it is published.

The university consistently provides accurate information to our community regarding the safety of our campus. In furtherance of these efforts, we make our policies, procedures and statistics available electronically.

A printed copy of this information can be obtained by contacting the university or you can request a mailed copy by contacting the Clery compliance coordinator, Gina Combs, at (859) 572-5746.

## ABOUT NKU

NKU is one of Greater Cincinnati's outstanding universities. The university enjoys a student, faculty and staff population of more than 16,000 individuals, plus a significant number of visitors to NKU's many programs and special events. NKU is committed to providing a safe, secure environment for students, faculty, staff and visitors to our Highland Heights and Grant County campuses. Many individuals and departments are involved in campus safety and security.

While no location is devoid of crime, the university's main campus in the city of Highland Heights holds a 23rd-place ranking as the safest college campus in America, according to Rent College Pads. NKU has also been named one of America's Top Colleges by Forbes.

NKU is committed to working with stakeholders to make our campuses safe and secure. The university has developed a series of policies and procedures to assist in these efforts. The following information has been prepared to increase your awareness of the current programs that exist to assist you in protecting your safety and well-being. Portions are also provided in compliance with the federal law, specifically the Clery Act.

## MESSAGE FROM THE PRESIDENT

Providing a safe campus for our learners, faculty, staff, alumni and friends creates a secure environment to pursue our most cherished ambitions. Safety is a crucial part of our commitment to student success and regional stewardship.

To that end, we publish the Annual Security Report with information about the Clery Act and incidents that have occurred in our area. The report also includes information about crime reporting, crime prevention, victim's rights and services, public safety programs and other information that will help better inform you about the safety of our campus and the services available at NKU.

We all play an important role in ensuring the safety of our campus community and it is our responsibility to remain observant and report any activity, individual, or incident that poses a threat to our campus community. I encourage you to read this report and learn how we can all help to ensure NKU is safe for everyone.

Sincerely,

**Bonita J. Brown, J.D.**

Interim President

Northern Kentucky University

## MESSAGE FROM THE CHIEF

At University Police, our mission is to serve, protect and educate NKU's campus community. We have a wonderful group of dedicated professionals engaged in working to do those things around the clock. Our staff is committed to supporting student success and ensuring positive outcomes for our community wherever possible – including fostering close partnerships with both on-and off-campus partners.

While we are proud of recognition we've received as one of the safest campuses in the U.S., we also know that crime can happen anywhere at any time – including here. The information in this document can help you become more informed regarding crime in our community as well as the preventative and educational programming and activities available to you at NKU.

When people ask what it is that makes our community safe, I always start with recognition of our community as a whole and the individuals of whom it is comprised. Even the best first responders can't be effective in a place where the community is not an engaged partner working toward positive outcomes for all community members. I'm consistently impressed with the level of engagement found here and look forward to working together to invest in the safety of our community.

John Gaffin  
Chief of Police



## MISSION STATEMENT

**The mission of the NKU Police Department is to serve, educate and protect the public through community collaboration, problem recognition, problem resolution and police action.**

## THE CORE VALUES

**Integrity:** a firm adherence to moral principals

*Integrity is doing the right thing when no one is watching. It is consistency between values and actions and holding ourselves to a higher standard.*

**Loyalty:** faithfulness or devotion

*Loyalty is a commitment to this department, NKU and the community at large. We do not stand idly by as anyone attempts to harm any of the above nor do we act in opposition to the mission or goals of the above.*

**Courage:** the ability to confront fear, pain, danger, uncertainty or intimidation

*We are courageous—not just physically in the face of hardship, pain or other threats but also morally in our ability to act rightly where unpopular or where others cannot or will not act.*

**Professionalism:** the behavioral embodiment of our community and our profession expectations

*We recognize that we represent ourselves, our department, our university, our profession. We carry ourselves in a manner positively representing all of the above.*

**Adaptability:** the ability to change or bend as dynamic situations or community needs dictate

*We recognize that policing an institution of higher learning often calls upon officers to be many things to many people. We accept our role willingly and strive to serve the community to the best of our ability, regardless of circumstances.*

**Diversity:** creating a culture of openness and inclusion that values diversity in people and ideas.

*We acknowledge and embrace the diversity in the community we serve and strive to ensure diversity is reflected in all levels of our organization.*

## INTRODUCTION

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (referred to as the Clery Act) is part of the Higher Education Opportunity Act. It requires institutions of higher education that receive federal aid to report specified crime statistics on college campuses and to provide other safety and crime information to members of the campus community. The U.S. Department of Education holds enforcement authority for the Clery Act, and there is a minimum \$67,544 penalty for each violation of the regulations that define the reporting requirements.

The university endeavors to consistently provide accurate information to our community regarding the safety of our campus. In furtherance of these efforts, we make our policies, procedures and statistics available electronically. This information can help keep you and others safe at NKU.

If you would like to receive a printed copy of this report, you can stop by University Police at 251 Louie B. Nunn Dr. Highland Heights, KY 41099, or you can request that a copy be mailed to you by calling (859) 572-5746 or sending an email to [combsg7@nku.edu](mailto:combsg7@nku.edu).

## PREPARATION OF THE ANNUAL SECURITY REPORT

University Police prepares the Annual Security Report (ASR) in compliance with the Clery Act. Crime statistics for Clery Act reportable crimes, hate crimes and violations of state and local drug, liquor and weapons laws—which occur within the Clery geography where arrests or referrals for discipline were made—are collected from reports made to University Police and designated Campus Security Authorities (CSAs). University Police has established collaborative relationships with local and state law enforcement agencies—Highland Heights Police Department (HHPD), Campbell County Police Department (CCPD), Kentucky State Police (KSP) and the Williamstown Police Department (WPD)—to encourage statistical Clery reporting by those agencies serving both our main campus and our Grant County campus and public property areas as well as identified non-campus properties that University Police does not patrol or provide a primary law enforcement response.

The ASR is prepared in collaboration with the Office of Student Conduct Rights & Advocacy, University Housing, Human Resources, the Office of the Provost, local law enforcement agencies and stakeholders. Clery compliance is an institutional responsibility, and each department or entity is required to provide updated information to University Police to comply with the Clery Act.

Crime statistics reported to/by any of these sources are recorded in the calendar year the crime was reported. Spearheaded by the Clery compliance coordinator in conjunction with numerous stakeholders, including the chief of police; the Office of Human Resources; the Office of Student Conduct, Rights & Advocacy; Safety and Emergency Management; Compliance; Title IX officers; and the compliance officers.

A written request for statistical information is made on an annual basis to all identified campus security authorities (CSAs) as defined by federal law and university policy. CSAs are also informed through training to report crimes to University Police in a timely manner so those crimes can be evaluated for timely warning purposes.

Certified counselors and pastoral counselors are not required by law to provide statistics for this compliance

document. However, certified counselors and pastoral counselors, as defined by federal law, who act in such capacities are advised that while they are not obligated to report crimes for the purpose of compiling statistical information, they are encouraged, when they deem it appropriate, to inform individuals they are counseling of their ability to report any crime to University Police for inclusion in the annual statistics.

The statistical information published in the ASR is reported to the Department of Education and is available to the public through the Department of Education's website.

University Police sends an email to every enrolled student and current employee on an annual basis informing them of the availability of the ASR, which can be found on the University Police website ([nku.edu/securityreports](http://nku.edu/securityreports)). A physical copy can be requested by contacting University Police, at (859) 572-5746 or in person at 251 Louie B. Nunn Dr. Highland Heights, KY 41099.

## CAMPUS SECURITY ACT LEGAL REQUIREMENTS

### Federal Law:

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act) is part of the Higher Education Opportunity Act. It requires institutions of higher education that receive federal financial aid to report specific crime statistics on college campuses and to provide other safety information to members of the campus community. The U.S. Department of Education holds enforcement authority for the Clery Act there is a minimum penalty of \$62,689.00 for each violation for the regulations that define the reporting requirements.

### State:

The Kentucky Campus Safety and Security Act (Minger Act) requires higher education institutions in Kentucky to report crime statistics to current and prospective students and employees, to maintain a daily crime log, to report a fire or threat of fire to the Office of the State Fire Marshal immediately and to issue special reports when there is an ongoing threat to the safety of students and employees. An annual report of campus safety policies, programs and statistics must also be submitted to the Kentucky Council on Postsecondary Education.

### Compliance:

University Police has been designated as the entity for ensuring that the requirements of the Clery/Minger Acts are met by the designated CSAs and the university as an entity. Federal laws require university employees that are defined as CSAs to report all crimes and fires of which they become aware.

### Geographic Definitions:

Crimes are reported according to the following geographic definitions:

- **On-Campus:** (1) Any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institution's educational purposes, including residence halls; and (2) any building or property that is within or reasonably contiguous to paragraph the first paragraph of this definition, that is owned by the institution but controlled by another person, is frequently used by students and supports institutional purposes, such as a food or other retail vendor.
- **Non-Campus Building or Property:** (1) Any building or property owned or controlled by a student organization that is officially recognized by the institution (i.e. privately owned fraternity); or (2) any building or property owned or controlled by an institution that is used in direct support of or in relation to the institution's educational purposes, is frequently used by students and is not within the same reasonably contiguous geographic area of the institution.
- **Public Property:** All public property including thoroughfares, streets, sidewalks and parking facilities within the campus or immediately adjacent to and accessible from the campus.
- **Reasonably Contiguous:** Refers to a building or property an institution owns or controls that is in a location that students consider to be, and treat as, part of the campus. Generally speaking, it is reasonable to consider locations within one mile from the core or main campus border to be reasonably contiguous with the campus.



Updated guidance from the Department of Education (DOE) found portions of previous Clery direction to have been “outside of the scope of the relevant statutory authority.” Subsequently, DOE reiterated the importance of applying the plain meaning of words within the Clery Act. According to DOE, the “complexities of Clery Geography” led to “unnecessarily expansive” reporting that lessened the value of Clery data. As a result, DOE has committed to a more flexible standard by accepting “an institution’s reasonable interpretation of terms” where they are “clearly defined” to Annual Security Report readers.

In the Act, noncampus property is “any building or property owned or controlled by a student organization officially recognized by the institution; or (ii) any building or property owned or controlled by an institution that is used in direct support of, or in relation to, the institution’s educational purposes, **is frequently used by students**, and is not within the same reasonably contiguous geographic area of the institution.”

Now revoked guidance previously resulted in certain hotel stays as short as one night triggering the “frequently used” standard, necessitating inclusion of hotel rooms, hallways, lobbies, and other common areas in an institution’s noncampus property. For the purposes of determining what constitutes noncampus property, a conventional hotel stay (as opposed to overflow residence hall arrangements, for example) will trigger the “frequently used by students” standard when, within a single reporting year, the duration of any individual stay or multiple combined stays at a single location is more than three nights.



# CAMPUS CRIME STATISTICS FOR NORTHERN KENTUCKY UNIVERSITY (HIGHLAND HEIGHTS CAMPUS)

(Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act) Calendar Years 2020-2022

OFFENSE (Crimes Reported by Hierarchy)	YEAR	GEOGRAPHIC LOCATION			
		On-Campus Property (including Student Housing Facilities)	On-Campus (Student Housing Facilities only)	Non-Campus Property	Public Property
Murder / Non-Negligent Manslaughter	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Manslaughter By Negligence	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Rape	2022	7	7	0	1
	2021	5	4	1	0
	2020	4	4	0	0
Fondling	2022	4	2	0	1
	2021	3	3	0	0
	2020	2	2	0	0
Incest	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Statutory Rape	2022	1	1	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Robbery	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Aggravated Assault	2022	0	0	0	0
	2021	0	0	0	0
	2020	1	1	0	0
Burglary	2022	3	1	1	0
	2021	3	2	0	0
	2020	4	3	1	0
Motor Vehicle Theft	2022	0	0	0	0
	2021	1	0	0	0
	2020	1	0	0	0
Arson	2022	0	0	0	0
	2021	0	0	0	0
	2020	1	0	1	0

Arrests and Disciplinary Referrals Reporting Table					
OFFENSE	YEAR	GEOGRAPHIC LOCATION			
		On-Campus Property (including Student Housing Facilities)	On-Campus (Student Housing Facilities only)	Non-Campus Property	Public Property
Arrests: Weapons: Carrying, Possessing Etc.	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Disciplinary Referrals: Weapons: Carrying, Possessing Etc.	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Arrests: Drug Abuse Violations	2022	0	0	0	0
	2021	0	0	0	0
	2020	6	0	0	1
Disciplinary Referrals: Drug Abuse Violations	2022	12	12	0	0
	2021	11	9	0	0
	2020	11	7	0	4
Arrests: Liquor Law Violations	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	1
Disciplinary Referrals: Liquor Law Violations	2022	15	15	0	0
	2021	17	17	0	0
	2020	2	2	0	0

**\*\*NOTE:** Above statistics for liquor, drug and weapons law arrests and referrals were calculated using guidance from the 2016 Department of Education Handbook. These statistics will be calculated outside of the hierarchy.

VAWA Offenses Reporting Table					
OFFENSE	YEAR	GEOGRAPHIC LOCATION			
		On-Campus Property (including Student Housing Facilities)	On-Campus (Student Housing Facilities only)	Non-Campus Property	Public Property
Domestic Violence	2022	1	1	0	0
	2021	0	0	0	0
	2020	1	1	0	0
Dating Violence	2022	1	1	0	0
	2021	3	2	0	0
	2020	1	1	0	0

Stalking	2022	8	6	0	0
	2021	10	7	0	0
	2020	7	1	0	0

*Reported crimes may involve individuals not associated or affiliated with NKU. Reported crimes may include information received from anonymous reporting. Student housing facility crime statistics are a subset of the on-campus category, (i.e. they are counted in both categories).*

### **HATE CRIME STATISTICS**

**2022:** Zero Hate Crime reported.

**2021:** Zero Hate Crime reported.

**2020:** One Hate Crime reported.

### **UNFOUNDED CRIMES**

**2022:** One unfounded case.

**2021:** One unfounded case.

**2020:** One unfounded case.

### **Unfounded Crimes**

If a crime is reported as occurring on campus, in on-campus student housing facilities, in or on non-campus buildings or property or on public property and the reported crime is investigated by law enforcement authorities and found to be false or baseless, the crime is considered to be "unfounded." Only sworn or commissioned law enforcement personnel may unfound a crime after a thorough investigative process.

## NORTHERN KENTUCKY UNIVERSITY POLICE AND THE CLERY ACT

The NKU Police Department has been designated by the CSAs and the University as the entity responsible for coordinating university efforts to meet requirements of the Clery and Minger Acts.

### University Police is responsible for:

- Collection of data and statistics for the annual campus security report which includes crime and fire data as required in the Clery and Minger Acts by Oct. 1 of each year
- Preparing and submitting the annual campus security report by Oct. 1 of each year
- Creating and posting the daily crime log ([nku.edu/police/crimelog](http://nku.edu/police/crimelog)) and daily fire log so they are available to the public
- Reporting any fire that occurs in an on-campus student housing facility
- Distributing the annual campus security report as required by the Clery and Minger acts to NKU's Office of Marketing and Communications
- Issuing timely warnings and emergency notifications as appropriate
- Posting the ASR on the University Police website ([nku.edu/securityreports](http://nku.edu/securityreports))
- Compiling and maintaining a list of NKU CSAs in conjunction with the Office of Compliance and Institutional Ethics
- Reporting on the completion of training for CSAs in conjunction with the Office of Compliance and Institutional Ethics

## CAMPUS SECURITY AUTHORITY (CSAS)

CSAs are broadly defined for this policy as an official of an institution who has significant responsibility for student and campus activities or monitoring university property or an individual who a student could reasonably believe has this authority or responsibility. Examples of CSAs at NKU include but are not limited to:

- The president, provost, vice presidents, senior vice presidents, vice provosts, deans, department chairs and directors
- Assistant and associate vice presidents and assistant and associate vice provosts
- Resident assistants/advisors
- Athletics employees
- Parking Services employees
- Student Affairs employees
- Office of Fraternity and Sorority Life employees
- Norse Violence Prevention Center employees
- University compliance officer
- Title IX coordinator(s) and deputy Title IX coordinator(s)
- Any employee in a supervisory or management role
- Any faculty member responsible for supervising any activities or programs that include direct contact with students outside the classroom (this includes faculty advisors)
- University Police employees

**Exceptions regarding CSAs:** When a professional mental health counselor, pastoral counselor and any other licensed counselor is functioning in those capacities, they are not considered to be a CSA. Maintenance, support and clerical staff are not considered CSAs.

CSAs are not responsible for investigating crimes. CSA's are only responsible for reporting crimes by completing the Campus Security Authority Incident Form ([nku.edu/police/incidentform](http://nku.edu/police/incidentform)) or by calling University Police at (859) 572-5500.

This information is provided to meet the requirements of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act of 1998 and the Kentucky Postsecondary Education Campus Security (Minger) Act of 2000.

Submission of the Campus Security Authority Incident Form does not constitute an official police report and will not result in any further investigation by law enforcement personnel unless the reported act is an immediate threat to the safety or well-being of a student or the university community.

The designation of CSA is not an optional designation. The exceptions are listed as follows.

#### **Exemption definitions regarding CSAs:**

- **Professional counselor:** a person whose official responsibilities include providing mental health counseling to members of the institution's community and who is functioning within the scope of the counselor's license or certification.
- **Pastoral counselor:** a person who associates with a religious order or denomination, is recognized by that religious order or denomination and someone who provided confidential counseling and is functioning within the scope of that recognition as a pastoral counselor.

Members of the university community are asked to report violations of this policy to the appropriate authorities by contacting the Clery compliance coordinator at (859) 572-5746, the Title IX investigator at (859) 572-7669.

## **UNIVERSITY POLICE ENFORCEMENT AUTHORITY**

University Police officers are sworn and state-certified police officers responsible for the full range of law enforcement services. These include but are not limited to: responding to and the investigation of incidents and offenses, medical emergencies, fires, bomb threats, traffic accidents, enforcement of state and local laws and other incidents that require police assistance. University Police is responsible for providing services to NKU's Highland Heights campus and is accredited through the Kentucky Association of Chiefs of Police.

The director of the Office of Student Conduct, Rights and Advocacy—along with the assistant vice president for Student Engagement/Dean of Students, Title IX officers, and the vice president for Student Affairs—coordinates disciplinary action for matters that are violations of university rules.

University Police provides protection to NKU's Highland Heights campus community with an emergency dispatch center, which is staffed 24 hours a day. University Police maintains a close working relationship with all appropriate law enforcement elements of the criminal justice system. Meetings are held with other agencies on both a formal and informal basis.

University Police services a community of more than 16,000 students, faculty, staff and visitors with a staff of 24 people. This includes sworn and non-sworn personnel consisting of:

- Chief of police
- Two lieutenants
- One sergeant/detective
- One Administration Operations Manager\*
- Three sergeants
- Seven full-time police officers
- One K-9 unit (Athena)
- Five Five full time state-certified emergency dispatchers

*\*depicts a certified emergency dispatcher*

## UNIVERSITY POLICE ARREST AUTHORITY

University Police officers receive their law enforcement authority through the provisions of Kentucky Revised Statutes 164.950-164.990. All University Police officers have arrest powers, and as such, officers have the right to carry a concealed weapon and to exercise the power of arrest when discharging their duties while in or out of uniform—to discharge their duties on or off campus.

## UNIVERSITY POLICE OFFICER JURISDICTION

The University Police's jurisdiction encompasses on-campus property that includes campus residence halls, buildings and/or facilities; designated non-campus properties and facilities; public property adjacent and accessible from on campus property; and leased, rented or otherwise recognized and/or controlled buildings, spaces and/or facilities. University Police also has jurisdiction or enforcement authority outside of the identified Clery reporting geography—this includes areas and/or properties that are not owned, rented, leased, recognized or otherwise controlled by the university.

*\*The director of the Office of Student Conduct, Rights and Advocacy along with the vice president for the Office of Student Affairs and Dean of Students, Title IX officer, and the Office of Student Affairs, coordinate disciplinary action for matters that are violations of university rules.*

## UNIVERSITY POLICE TRAINING

University Police officers are trained according to Kentucky Law Enforcement Council standards which apply to all peace officers in Kentucky. Certification requires that each officer must successfully complete 806 hours of basic training at a school certified by the Kentucky Law Enforcement Council. University Police officers attend the Department of Criminal Justice Training (DOCJT) Police Academy in Richmond, Kentucky.

Each officer completes a 14-week, in-house field training program. Training includes firearms, defensive tactics, law, evidence collection and traffic accident investigation among other topics. Officers also attend a minimum of 40 hours of in-service and specialized training in a variety of

subjects to ensure competency in law enforcement, security and safety areas.

In addition, each officer receives periodic in-house training in CPR, first aid, firearms, hazardous materials, blood borne pathogens, health and counseling and other related topics. Training also includes department and guest lecturers, select seminars, training, webinars and roll-call information sessions relating to civil law, federal law, the Clery Act and campus security authority, Title IX, sexual assault and gender violence response and investigation, trauma informed investigation, public relations, inclusivity, interpersonal communication, crisis intervention, critical incident response and incident command system, emergency operations and other related topics.

## EMERGENCY DISPATCH TRAINING

All full- and part-time University Police dispatchers are certified and trained according to Kentucky Law Enforcement Council standards. They attend the same basic training academy as other emergency dispatchers in the Commonwealth of Kentucky. Certification requires that each full-time dispatcher must successfully complete 200 hours of basic training at the Department of Criminal Justice Training (DOCJT). Certification further requires a minimum of eight hours of annual in-service and specialized training. Dispatchers receive instructions on a variety of subjects including cultural awareness, dispatching for critical incidents, human trafficking and fire/hazmat incidents. Each dispatcher completes an in-house field training program where they become familiar with university specific systems including fire alarms, call boxes, video monitoring system and emergency mass notification system.

## LAW ENFORCEMENT PARTNERSHIPS



### UNIVERSITY POLICE'S WORKING RELATIONSHIP WITH OTHER LOCAL LAW ENFORCEMENT

University Police maintains a close working relationship with local, state and federal law enforcement agencies. Officers meet their counterparts from northern Kentucky and the Greater Cincinnati area, Kentucky State Police, the FBI, postal inspectors, ATF and the Secret Service regarding common crime problems and criminal activity on and near campus. Crime-related reports and statistics are also exchanged with Highland Heights Police, Williamstown Police and contiguous Kentucky State police departments to monitor and record criminal activity which may involve students at off-campus locations. By agreement with these agencies, University Police responds to situations at off-campus locations when requested by the agencies. These agencies will also respond to campus at the request of University Police.

### MOUs: Written Memorandums of Understanding with Local Law Enforcement Agencies

There are written agreements or Memorandums of Understandings (MOU) between University Police and Campbell County's local law enforcement agencies. Current agreements specifically address the response and investigation of alleged incidents of sexual assault, relationship violence and crime scene investigations.

## REPORTING TO LAW ENFORCEMENT

NKU encourages crime victims, witnesses or anyone who learns about a crime to report the crime or emergency accurately and promptly to University Police. If you are



off campus, you are encouraged to contact local law enforcement or, if in emergency, dial 911. Every report made to University Police is reviewed to determine whether a follow-up investigation is required, whether a timely warning or emergency notification to the NKU campus community is warranted and whether the incident qualifies as a Clery-reportable event for the ASR.

University Police is located at 251 Louie B. Nunn Dr., Highland Heights, KY 41099, and can be reached 24 hours a day. If in an emergency, dial 911 or (859) 572-7777 to be connected to University Police's Emergency Dispatch Center.

When calling 911 from a campus phone, you will be connected to the University Police Emergency Dispatch Center. If on campus and calling 911 from a cell phone, your call will be connected to the Campbell County Consolidated Dispatch Center. Once you identify that your emergency is on NKU's campus, you will be connected to University Police's Emergency Dispatch Center for assistance.



## IMPORTANT NUMBERS

### For on-campus emergencies (police, fire, or medical):

- Dial 911 from a campus or mobile phone.
- Dial (859) 572-7777.
- Use one of the emergency call boxes located throughout campus.
- Use the emergency intercom system located in the building elevators.
- Text UPD through the NKU app on your phone.

### For on-campus or off campus non-emergency calls:

- Dial (859) 572-5500
- Text UPD through the NKU app on your phone.

### For off-campus emergencies:

- Dial 911 from a hardwired phone.
- Dial 911 from a mobile phone.
- Text UPD through the NKU app on your phone.

### For Grant County Campus:

University Police does not respond to emergency calls at the Grant County campus and encourages faculty, staff and students to report any immediate threats to Williamstown Police Department by dialing 911 or, for non-emergency calls, dial (859) 824-3353.

## UNIVERSITY POLICE NEW CAMPUS LOCATION

University Police has a new facility. The newly upgraded space has been built for the department's specific needs, including an upgraded dispatch center with resilient and redundant technology. Located in the former Honors House, the new space also features flex space to host small to medium size groups of students for engagement events and opportunities. The new address is 251 Louie B. Nunn Dr., Highland Heights, KY 41099.

## COMMUNITY RESOURCES

### Destination Safe

A free companion service to enhance campus safety. Available at all times, University Police offers this service to accompany students, staff, and faculty members to and



from parking lots, parking garages, campus offices, campus facilities, residential halls, or any other location on campus.

We strongly encourage all students, faculty and staff to walk in pairs or small groups, especially late at night.

### Text to Connect

A free service that allows you to contact University Police by text, instead of phonecall. Download the NKU app on your phone and select "Contact Campus Police."

### Campus Security Authority Reports

Campus Security Authorities (CSAs) should report crimes in progress by immediately dialing 911. If a crime is not in progress, crimes still need to be reported accurately and promptly to the University Police website ([nku.edu/police/incidentform](https://nku.edu/police/incidentform)).

If you find yourself questioning if an incident is reportable or if you should report an incident, side with caution by submitting a CSA report form. Once you report the incident, you have fulfilled your responsibility as a CSA. Your report could make a difference. Providing the information helps officials decide if a timely warning or emergency notification needs to be sent out to the campus community, which, in turn, could help prevent another person from being victimized.

### **Voluntary/Anonymous Reporting**

University Police does not have a voluntary confidential reporting policy. CSAs are required to report crimes of which they become aware. NKU encourages all victims or witnesses of a crime to file a report with University Police. Community members can report criminal or suspicious activity anonymously by either calling the University Police emergency dispatch center at (859) 572-5500 or by using the Crime Tip Form ([nku.edu/police/crimetips](http://nku.edu/police/crimetips)). If a crime is in progress, contact law enforcement by dialing 911.

### **Confidential Reporting**

Students may make confidential reports to pastoral counselors and/or certified counselors assigned to the counseling center. Pastoral counselors and certified counselors in their capacity and function do not make identifiable reports of incidents to the official on-campus resources unless the student specifically requests them to do so. However, the university encourages counselors, if and when they deem it appropriate, to inform students they can report incidents of crime to University Police—which can be done directly or anonymously through the facilitated anonymous reporting process as outlined below. Students may request a pastoral counselor or a certified counselor in the Health, Counseling, and Student Wellness to facilitate anonymous reporting using an internal form designed to capture general details about the incident (date, time, location and brief description of the incident type) for inclusion in the ASR. This form can be found on the University Police website ([nku.edu/police/incidentform](http://nku.edu/police/incidentform)).

Most reports are public records under state law. University Police cannot hold reports of crime in confidence. When a dangerous threat to the university community arises, timely warnings will be issued by means including but not limited to: email announcements, text messages, voicemail messages, flyers or other appropriate means. Confidential reports are generally made to other CSAs who meet certain requirements and only under certain situations, such as pastoral or professional counselors that are acting in that role when made aware of a crime.

### **Crime Tips**

Anyone may report a crime or criminal activity to University Police by calling (859) 572-5500 or by using the Crime Tip

Form located online ([nku.edu/police/crimetips](http://nku.edu/police/crimetips)). The Crime Tip Form should not be used in emergency situations. For emergencies, call 911 or (859) 572-7777. While anonymous reporting is available by this limited means, the university's ability to investigate and appropriately address allegations. Crimes reported confidentially to the counseling center or pastoral counselors are not disclosed in the university's crime statistics or reporting processes unless those crimes are reported to University Police through the facilitated anonymous reporting process. University Police investigates all criminal activity, vehicle collisions, missing persons and other traditional police concerns as they pertain to the university community.

### **Timely Warnings**

Timely warnings are designed to provide notification regarding certain crimes which present a serious and continuing threat to the campus community. The occurrence of Clery reportable crimes on campus or on non-campus property immediately adjacent to or accessible from campus may trigger a timely warning. Such crimes include:

- Criminal homicide (murder, non-negligent manslaughter or manslaughter by negligence)
- Sexual assault (including rape, fondling, incest and statutory rape)
- Robbery
- Aggravated assault
- Burglary
- Motor vehicle theft
- Arson
- Hate crimes (as defined by the FBI UCR handbook)

In order to trigger a timely warning, the crime in question must present a serious and continuing threat to the campus community. University Police will examine the facts surrounding each eligible crime to determine, on a case-by-case basis, if such a threat exists. Factors to be examined include but are not limited to:

- The nature of the crime;

- The continuing danger to the community; and
- The risk of compromising law enforcement efforts.

If deemed appropriate, a timely warning will be issued to allow community members to take steps to protect themselves. Timely warnings also seek information that may lead to the arrest and conviction of the offender.

On the Highland Heights campus, the chief of police, or designee, is responsible for preparing timely warnings. Information for timely warnings may come from other law enforcement agencies or other offices. While every attempt will be made to distribute the alert as soon as possible after an incident or series of incidents is reported, the release is subject to the availability of accurate information concerning the incident(s). A determination will then be made regarding the existence of an ongoing threat to the community.

University Police makes every effort to properly classify a criminal incident when issuing a timely warning. However, upon further investigation and analysis, it may be determined that an incident for which a timely warning was issued did not ultimately fall within the definitions of Clery-reportable crimes. Therefore, some incidents for which timely warnings were issued may not be included in the crime statistics provided by NKU's ASR.

Timely warnings must be communicated in a way likely to reach the entire community. University Police will work in conjunction with the vice president for Student Affairs to disseminate timely warnings. Warnings will be disseminated primarily using the NKU Flash and NKU Student Flash email list serves. Warnings will also be posted online ([nku.edu/police/timelywarnings](http://nku.edu/police/timelywarnings)).

Timely Warnings will include (subject to availability):

- A summary of the incident
- Possible connection to previous incidents (if applicable)
- Physical description of the suspect (if available)
- Actions taken by police officials in response to the crime(s)
- Crime prevention, personal safety or other community safety resources, tips or action items

University Police may withhold timely warnings, or information in timely warnings, if providing that information could compromise law enforcement efforts. Additionally, timely warnings may be updated if new or more accurate information becomes available.

### **Crime Awareness Bulletin**

University Police recognizes that some instances or crimes not triggering a timely warning can be addressed through similar means. When circumstances warrant, University Police may release a crime awareness bulletin to inform the community to a particular string of incidents, such as a string of thefts or car break-ins. The intention is to bring about awareness and inform the community of particular incidents with the ultimate goal of preventing further occurrences. The crimes reported in such bulletins are not subject to timely warning mandates. These bulletins may be placed on University Police's social media pages and/or a bulletin may be placed in a public areas on campus. Dissemination of such bulletins will be considered on a case-by-case basis.

### **Grant County Campus**

Grant County Center is responsible for preparing and distributing timely warnings for that campus via email blast to their faculty, staff and students and/or by placing a bulletin in a public area on campus.

## **EMERGENCY NOTIFICATION PROTOCOL**

The purpose of this protocol is to guide the university in the authorization and issuance of messages via its emergency notification channels. These channels of communication can be used during emergencies or situations in which the campus is in imminent danger and individuals should take immediate safety precautions. They can also be used to notify the community of closures, delays, utility failures or other events which cause a significant disruption of campus services.

This protocol provides a projection of emergency notification needs and anticipated responses. The protocol is not a replacement for good judgment and leadership in

times of crisis. Further, it is not intended to be a set of all-inclusive instructions for responding to an emergency, as each situation will differ and individually accounting for the innumerable variables involved is not realistic.

Note: Decision making for winter weather-related closures occurs through a separate process, and notification is initiated as soon as possible following a decision.

### Communication Channels

For the purposes of this protocol, the following communication channels will be considered as part of the university's emergency notification system:

- **Norse Alert:** A multi-modal alert and notification system provided by Rave Mobile Safety. Alerts generated within the system can be sent via SMS, telephone (voice), email and social media. University Police is responsible for sending Norse Alerts.
- **Public Address Warning System:** This system consists of outdoor sirens and indoor speakers capable of broadcasting alert tones along with preprogrammed messages. The system is also capable of broadcasting live voice warnings from University Police dispatch and the maintenance building. University Police is responsible for activating the public address and siren systems.
- **Email:** Emergency notifications can be sent to official nku.edu email addresses via the nkuflash and nkustudentflash listservs. In the event email is unavailable, communications will continue on official NKU social media channels. The Office of Marketing and Communications is responsible for email notification.
- **NKU Homepage:** Emergency notifications and messages can be posted at nku.edu. The Office of Marketing and Communications is responsible for notifications on the NKU homepage.
- **Official NKU Social Media Accounts:** Warnings sent via Norse Alert can be communicated on official NKU social media channels, including Twitter and Facebook. The Office of Marketing and Communications is responsible for notifications made via official NKU social media accounts.

### Intended Use

Emergency notifications will occur upon confirmation of a dangerous situation that poses a threat to safety on NKU's campus. Such situations include:

- Active shooter
- Fire
- National Weather Service-issued tornado warning for Campbell County, Kentucky
- Hazardous materials release
- Presence of an explosive device

Emergency notification may be delayed if it will compromise the efforts of first responders to contain and/or resolve the situation.

As noted previously, components of the alert system can also be used to notify the community of closures, delays, utility failures or other similar events that may not be immediately life threatening.

## CONFIRMATION OF DANGEROUS SITUATIONS

Dangerous situations may be confirmed in a variety of manners—depending on the type of situation.

### Weather

Tornado warnings are considered to be confirmed when the National Weather Service issues a tornado warning for Campbell County, Kentucky.

### Crime

Crime-related situations will be considered confirmed upon observation by a police officer or by a credible report from another police agency. If a citizen or community member reports a situation in which harm is actively occurring, waiting for confirmation from an on-scene police officer may cause unnecessary delay. In such cases, the on-duty police dispatcher will immediately notify the chief of police or designee. Available information will be reviewed and the chief of police or designee will determine if sufficient information exists to immediately initiate emergency notification.

## Other

Other situations can be confirmed by established authorities with expertise related to the emergency. Examples include: Campbell County Emergency Management, Central Campbell Fire Department and Northern Kentucky Health Department.

## AUTHORIZATION OF EMERGENCY NOTIFICATIONS:

The authorization process for emergency notifications will vary. The immediacy of threat-to-life safety and the time before that threat commences will dictate the approval process for notifications.

- Confirmed events which require immediate action to reduce a threat-to-life safety require authorization from the on-duty police supervisor or other higher ranking police official. *Example: Police officers respond to a report of a fight. Upon their arrival, a suspect brandishes a weapon and fires several shots before fleeing the scene.*
- Confirmed events which may pose a threat to the community but are not actively life threatening require authorization from the chief of police in consultation with the vice president for Student Affairs. *Example: A neighboring police department responds to a report of an armed bank robbery in close proximity to the university's boundaries. The suspect has fled the scene, and their whereabouts are unknown.*
- Unconfirmed events will trigger an emergency notification when, in the judgment of the chief of police or designee, available information is sufficient to suggest that an event is likely to be active, harmful and life threatening. *Example: Multiple callers to the dispatch center have reported the sound of gunshots and screaming in an academic building.*

Public Address Warning System may be activated by a police dispatcher without further authorization during National Weather Service-declared tornado warnings for Campbell County, Kentucky. The dispatcher will also sound the all-clear message when the tornado warning has been lifted.

## STATUS UPDATES AND ALL-CLEAR MESSAGES

Status updates will be sent, as appropriate, as situations evolve and new information is available. Follow-up messages will be sent in accordance with the provisions of this protocol. All-clear messages will be sent, as appropriate, when an emergency has been resolved.

All-clear messages will also be sent, as appropriate, if notification was delayed to allow first responders to contain and/or resolve a situation. Such instances include scenarios where an emergency was resolved before emergency notification was initiated.

## MISSING STUDENT NOTIFICATION

It is the policy of the university to provide all students residing in on-campus housing the option of identifying an individual or individuals to be contacted by the university in the event that the student is determined to be missing for a period of more than 24 hours. This confidential missing persons contact, also referred to as confidential contact person, for residential students is in addition to general emergency contact information collected by the university. The policy does not restrict NKU from making notifications earlier than noted if deemed necessary. Official determination that a student is missing is made by the investigating police department.

### Confidential Missing Persons Contact Information

- All students, regardless of age, who reside in on-campus housing, will have the option to identify a confidential contact person or persons to be contacted in the event that the student is reported missing. The student may identify the same person for both the general emergency contact person and as their confidential contact person.
- Students can list multiple confidential contact persons.
- Students who wish to identify a confidential contact person(s) may do so through the Office of University Housing.

- Confidential contact information is strictly for missing person purposes and shall be accessible only by authorized campus officials identified in this policy.
- The confidential contact information will only be shared with police personnel in furtherance of a missing person(s) investigation.
- Students shall be given the opportunity to register confidential missing persons contact information at the time of application for on-campus housing. This information can be updated at any time by contacting the Office of University Housing.
- Confidential contact information must be kept separately from general emergency contact information.
- If a student under the age of 18 has been determined to be missing, the university shall notify both the student's custodial parent or guardian and the student's confidential contact person within 24 hours that the student is missing (in no required order).
- If University Police determines a student to be missing, they shall notify the student's confidential contact person(s) within 24 hours. If the student has multiple contacts, the order of contact is determined by University Police. If a student has registered multiple contact persons and the first person contacted confirms that the student is not missing, the institution must contact each additional contact person unless the student in question has made contact with University Police.
- If the missing student is under the age of 18 and not emancipated, and it has been determined that the student is missing, the university shall notify both the student's custodial parent or guardian and the student's confidential contact person (in no required order) within 24 hours. If not previously done, this contact is required to be made once 24 hours has elapsed from the time the student was determined to be missing.
- If not previously done, University Police will notify the following entities once 24 hours has elapsed from the time the student was determined to be missing:
  - Local law enforcement;
  - Vice president for Student Affairs
  - Dean of Students

### Authorized Campus Officials

The following campus officials can access a student's confidential missing persons contact information: assistant vice president for Student Engagement/Dean of Students; director and assistant/associate director of University Housing; employees of the Office of Student Conduct, Rights, and Advocacy; and residence hall directors.

Note: Such information can only be accessed in conjunction with a missing person(s) investigation and shall only be disseminated to police.

### Procedures:

- If a member of the university community has reason to believe that a student who resides in on-campus housing is missing or receives a report of a missing student, he or she shall immediately notify University Police at (859) 572-5500. Upon receipt of missing student information, University Police will analyze the credibility of the report and initiate a preliminary investigation to determine whether the student is missing.

This policy contacts the official notification procedures of the university for missing students who reside in on-campus housing, in accordance with the requirements of the Higher Education Opportunity Act (HEOA). This policy can be viewed online ([nku.edu/police/disclosure](http://nku.edu/police/disclosure)).

### ADDITIONAL NOTIFICATION RESPONSIBILITY

NKU professional staff are informed of their responsibility to share alert information with their sponsored visitor and/or guests. Conference Services staff are instructed to inform conference attendee camp counselors and/or directors/leaders of alerts, and alert posters may be posted in areas or residence halls where conference or camp attendees are visiting and/or occupying. Conference Services staff are provided training on the University's

Sexual Misconduct Policy and reporting requirements to the Office of Title IX and University Police.

## DAILY CRIME AND FIRE LOG

University Police maintains a Daily Crime and Fire Log. The most recent 60-day period is open for public inspection during normal business hours at University Police located at 251 Nunn Dr. Highland Heights, KY 41099. The log is available on the University Police website ([nku.edu/police/crimelog](http://nku.edu/police/crimelog)). The Daily Crime and Fire Log contains the following information:

- All crimes occurring on Clery Act geography. Information includes the nature of the crime, date, time and general location of each crime, and the disposition (if known).
- The fire log entries include any fire that occurred in an on-campus student housing facility, including the nature, date, time and general location of each fire.

The Daily Crime and Fire Log does not contain any personally identifiable information about a victim.

Information in the log is not required to be disclosed when there is clear and convincing evidence that the release of such information would jeopardize an on-going criminal investigation or the safety of an individual; that may cause a suspect to flee or evade detection; or that could result in the destruction of evidence. In any of these cases, the information may be withheld until that damage is no longer likely to occur following the release of such information.

## SEX OFFENDER REGISTRY AND ACCESS TO RELATED INFORMATION

The Federal Campus Sex Crimes Prevention Act, enacted on Oct. 28, 2000, requires institutions of higher education to issue a statement advising the campus community where law enforcement agency information provided by a state concerning registered sex offenders may be obtained. It also requires sex offenders already required to register in a state to provide notice, as required under state law, of each institution of higher education in that state at which the person is employed, carries on a vocation, or is a student.

Under Section 121 of the Adam Walsh Child Protection Act of 2006, information regarding registered sex offenders who are subject to community notification may be obtained from the Kentucky State Police. The Kentucky State Police Sex Offender Registry is located online ([kpsor.state.ky.us](http://kpsor.state.ky.us)). This website provides sex offender registration information to the public through this website. The intent of this site is public safety and awareness. This database is made available to alert possible victims of potential danger, not to punish or embarrass offenders.

Information regarding registered sex offenders who are affiliated with the university may be accessed online ([nku.edu/police/sexoffenders](http://nku.edu/police/sexoffenders)).

## EMERGENCY PREPAREDNESS OVERVIEW

Emergency Preparedness at Northern Kentucky University is managed by the Director of Safety and Emergency Management utilizing the University's Emergency Operations Plan.

The Emergency Operations Plan (EOP) provides a framework which the University will use to respond to events creating major disruptions to the ordinary operations of the University. The purpose of the plan is to guide University officials in their efforts to minimize the impact of such events and return to routine operations as soon as possible.

The goal of this plan is to preserve human life, protect University research, protect University property and structures, protect the environment, and facilitate continuity of academic and business operations. The plan applies to the entirety of the University's campus.

## EMERGENCY OPERATIONS

All declared emergencies occurring on campus or impacting the university campus community will be managed using the NKU Emergency Operation Plan (EOP). The EOP design is based on the Incident Command System (ICS) and the National Incident Management System (NIMS) as outlined by federal and state agencies.

The EOP is the established protocol for managing all emergencies. University Police, Marketing and Communications, IT and Facilities Management, along with other university departments and the emergency services organizations, play an essential role as the first line of defense in most incidents. When responding to an emergency or disaster, the university will make full use of its facilities, equipment, supplies, personnel, and resources. The university president, as chief executive, has the authority to declare an emergency and delegate authority to the Incident Response Team (IRT). Incident command is established when an authorized individual (usually a University Police officer or supervisor, fire chief, police officer) is onsite and communicates their authority with all personnel involved.

Students, staff and faculty are informed of the university's Norse Alert - Emergency Notification program process annually during training and through written notification. This includes dissemination of information about how to respond during the activation of Norse Alert in response to a significant incident on campus or within the immediate area of the campus that potentially directly impacts the safety of campus community members. These information sessions have been built into first-year orientation, residence life student staff training and new employee/faculty orientations. Additionally, Norse Alert - Emergency Notification posters are posted in classrooms and public areas throughout campus. These posters provide quick actions for community members to take in the event of an Norse Alert - Emergency Notification activation, including shelter-in-place actions, etc. The University Safety and Emergency Management personnel test evacuation procedures for all residence halls at least once each semester as part of the fire drill and safe evacuation programs.

If a situation arises on or around campus that could potentially threaten the health or safety of university community members, senior officials of the university, members of IRT and members of University Police are notified as outlined in the EOP.

NKU police officers, supervisors and administrators are trained in crisis response and have the authority to take

immediate action in response to an imminent crisis, using the EOP and departmental procedures as a guideline.

These actions may include:

- Deployment of additional University Police officers
- Engagement of law enforcement officials
- Summoning of local, county or state emergency management officials
- Enhanced patrol of the campus
- Closing of roads and entrances onto campus
- Securing of campus buildings and residence halls
- Evacuation of campus buildings and residence halls

There is one Incident Commander (IC) for an incident. When more than one jurisdiction or one agency is involved, a unified command structure will be established. Command for Level 1 and Level 2 emergencies, as defined in the EOP, will typically function from an incident command post (ICP). Certain "triggering" conditions may dictate a broader institutional response. This broader response will be managed from the Emergency Operations Center (EOC) by the IRT.

When an EOC is activated, the IRT will assume a management, direction and coordination role over the institution's response and recovery. The IRT will act as an umbrella organization that brings together all of the elements necessary to support the incident and maintain ongoing operations. Incident command, or unified command, shall be moved to the EOC when activated.

The EOP organizational structure consists of two groups: the president's cabinet and the IRT. The executive team members are the policy decision-makers and include the president and senior staff. The IRT include key department heads from organizations throughout the institution. The members of IRT are institutional emergency resources; they are not persons who community members should report crimes to.

The two teams' composition is as follows:

#### **President's Cabinet**



- Interim President
- Vice President of Administration & Finance/CFO
- Provost and Executive Vice President for Academic Affairs
- Vice President for Legal Affairs & General Counsel
- Vice President for University Advancement
- St. Elizabeth Healthcare Executive Director of the Institute for Health Innovation and Vice President for Health Innovation
- Vice President for Student Affairs
- Executive Assistant to the President and Secretary to the Board of Regents
- Chief Diversity, Equity and Inclusion Officer
- Vice President and Director of Athletics
- Chief Human Resources Officer

#### **Incident Response Team**

- Director, Safety and Emergency Management
- Chief, University Police
- Assistant Vice President, Facilities Management
- Lieutenant, University Police
- Director, Operations & Maintenance
- Associate Provost, Faculty Affairs
- Interim Vice Provost, Undergraduate Academic Affairs
- Vice Provost, Graduate Education, Research and Outreach
- Assistant Vice President, Enrollment and Student Success
- Interim Comptroller
- Director, Procurement Services
- Assistant Director, Procurement Services
- Division Business Officer, Administration and Finance

- Assistant Vice President, Economic Engagement and Government Relations
- Executive Director of IEC, CGE and International Affairs
- Deputy Athletic Director, Business and Finance
- Assistant Director, Education Abroad
- Assistant Vice President, Marketing and Communications
- Senior Director, Strategic Communications
- Director, University Communications
- Director, Web and Digital Strategy
- Assistant Vice President, Student Success
- Dean of Students
- Interim Assistant Vice President, Student Engagement & Inclusiveness
- Unit Director, Student Wellbeing and Support

#### **IMMEDIATE OR EMERGENCY NOTIFICATION, RESPONSE AND NOTIFICATION**

The immediate notification capability of the emergency mass notification process is designed to assist the university in determining the content of the notification and initiating the notification system without delay—taking into account the safety of the community—unless issuing a notification will, in the professional judgment of responsible institutional authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency situation/incident.

The chief of police, or a University Police designee or IRT designee, may initiate the university’s emergency mass notification processes during extremely violent or hazardous incidents that pose immediate danger or threat to the health and safety of campus community members wherein University Police personnel need to notify campus community members immediately in order to reduce the likelihood of casualties or injuries.

Immediate notification to the campus about a confirmed seriously violent or extremely hazardous incident or dangerous situation involving an immediate threat to the health and/or safety of students or staff occurring on the campus or near the campus can be accomplished through a variety of communications methods, but the use of the emergency cell phone text/voice messaging, all campus email and/or alert siren would be seen as the most common and quickest form of communications under these circumstances. Confirmation typically involves the response and assessment of University Police officers, University officials, local police or emergency responders. As previously stated, notification will occur for these types of incident situations as described unless the notification will compromise efforts to assist a victim(s) or contain, respond to or otherwise mitigate the emergency.

In the event of an emergency, an effective campus-wide communications process is vital in order to provide the greatest safety possible for the campus community. As part of its EOP, the university has adopted a formalized procedure for issuing emergency alerts to the campus community. When on-duty University Police officers become aware of a situation that may warrant the issuing of an emergency alert, the on-duty officer confirms—through response, investigation, or collaboration with emergency responders—that there is a significant emergency and then immediately contacts the chief of police, who quickly evaluates the situation to determine if an alert is warranted, the content of the notification message and the appropriate segment or segments of the campus community who will receive the notification. In situations where an imminent threat is present, the chief of police or a University Police designee has the ability and authority to issue an alert without delay and without further consultation with any other university official.

In situations lacking the presence of an imminent threat, the chief of police or a University Police designee consults with the Vice President of Student Affairs, and/or other members of the Incident Response Team (IRT) prior to an alert being issued. The university, based on the judgments of members of University Police and IRT will endeavor to immediately notify the campus community (or appropriate segments separately and distinctly impacted) upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or staff occurring on or near the campus.

A threat is imminent when the need for action is instant, overwhelming and leaves no moment for deliberation. Such situations may include but are not limited to: a hazardous materials incident requiring sheltering in place or evacuation, an active shooter on or near campus or a shooting incident on or near the campus. Follow-up notices/communications will be provided as necessary during an active incident and may be provided by the chief of police, University Police designee or a IRT member. When a threat is neutralized or effectively removed, campus community members will be appropriately informed via all or some of the aforementioned communications methods.

When the emergency notification system is activated, university officials will notify campus community members of the emergency situation, its exact location and will most likely request community members to protect themselves by evacuating the affected area if it is safe to do so and/or by employing the “shelter-in-place” concept through established communication methods. University Police, local police and emergency responders as well as select university officials will be immediately notified of any actual on-campus emergency that poses a threat to campus and/or the immediate local community.

University authorities may instruct campus community members to “shelter-in-place” if a condition exists that is potentially life threatening and has an immediate threat to the health and personal safety of the campus community. Immediate threats would include but are not limited to: active shooter incidents, mass acts of violence, tornadoes, terrorist attacks or hazardous materials incidents.

#### **How to Shelter-In-Place:**

- Evacuate any potentially dangerous or hazardous situation immediately if safe to do so. If you cannot safely evacuate, stay where you are. Collect any emergency shelter-in-place supplies and a telephone to be used in case of emergency. If you are outdoors, proceed into the closest building quickly or follow instructions from emergency personnel.
- Locate a room to shelter inside. Choose an interior room, above ground level and without windows or with the least number of windows. If there is a large group of people located within a particular building, several rooms may be necessary.

- Shut and lock, all windows and close exterior doors. Doors and windows may need to be barricaded (if possible).
- Turn off air conditioners, heaters and fans.
- Close vents to ventilation systems as you are able.
- Notify University Police of your location and inform police of individuals sheltering with you.
- Turn on a radio or TV and listen for further instructions.
- Make yourself comfortable.

**Off-Campus Emergencies:**

University Police officials often receive emergency information from the Campbell County Consolidated Dispatch Center regarding incidents in Campbell County that could imminently impact the safety of the NKU community. When appropriate, University Police will notify the campus community of off-campus threats that could present a serious or continuing threat to students, employees and visitors.

**NORSE ALERT - EMERGENCY NOTIFICATION TESTING AND REGISTRATION:**

Norse Alert - Emergency Notification will be tested each academic semester to ensure that all systems are functioning properly and that emergency managers maintain a working knowledge of the system. These tests also serve as educational opportunities to remind campus and community members that the system exists and the functionality is reliable. Information is shared with the campus community related to the campus' emergency



response and evacuation procedures in conjunction with at least one of the annual Norse Alert - Emergency Notification test notifications.

The Norse Alert - Emergency Notification may include activation of indoor and outdoor sirens as well as phone/text/email messaging systems. These tests are usually announced tests, but they may be unannounced.

All student, faculty and staff emails are automatically loaded into the phone/text/email system. Additional information to be used for Norse Alert is optional. Students, faculty and staff must register through Norse Alert on myNKU:

- Log onto myNKU, and select Norse Alert tab.
- Under Update Settings, add your cell phone number (with area code) and other numbers that you wish to add.
- If you do not currently receive Norse Alert notifications, you should update your contact information if you would like to receive future notifications. The university's means of communicating during an emergency situation includes the following, although not all of these methods are always employed. The method(s) of communication are based on the details of emergency:
  - Cell phone text/voice messaging
  - Indoor and outdoor sirens
  - All campus email alerts
  - Voicemail
  - Computer instant pop-up emergency screen messages
  - Emergency website, Facebook and Twitter accounts
  - Telephone trees
  - Public media (TV, radio, news websites)
  - Fire alarm system notification
  - Public address system from siren and from University Police vehicles

- Flyers posted throughout campus
- Direct on-foot and in-person notifications

## EVACUATION PROCEDURES

University Police shall be responsible for the safe evacuation of all persons from university facilities in the event of active threats, civil disturbances and natural disasters. The level of necessity will determine the response by University Police. When large-scale events occur that are beyond the resource capabilities of University Police and the university, officials will request assistance from outside emergency resources such as the Highland Heights Police, Central Campbell County Fire Department, Kentucky State Police, Campbell County Emergency Management and/or state departments of emergency management. The need to implement evacuation from a campus building or the entire campus shall be based upon information received or furnished to NKU.

The information may be in the form of instructions or advice from the Campbell County Emergency Management, the Governor’s Office or other officially recognized agency. Full or partial evacuations may be necessary as a protective action to reduce campus community members’ exposure to a hazard. Protective actions reduce time of exposure, create distance or provide shielding from a specific hazard. Hazards that may require an evacuation include:

- Fire
- HAZMAT release
- Bomb threat or suspicious device/package
- Hostile intruder
- Massive utility failure
- Severe weather conditions
- Hazard that renders facilities uninhabitable

### Exercise of Judgment and Contingencies

When situations arise for which the procedures to be followed are not fully prescribed in the university’s EOP,

responsible personnel will be expected to exercise good judgment, make appropriate decisions and provide any support necessitated by the situation.

As part of the decision-making process relative to an evacuation, the evacuation must be able to be completed well before the arrival of a hazard. When there is little-to-no warning time, a shelter-in-place decision/order may be more appropriate. Additional factors to consider beyond warning time when deciding on whether or not to evacuate include:

- Size and geographical area affected
- Population density of the surrounding area
- Capacity and condition of the road network
- Checking if sufficient transportation resources are available – college transportation, public transportation and private transportation
- Availability of safe alternatives
- Ability of campus facilities to provide shielding from the hazard
- Ability of facilities to support the population
- Local considerations and local police and emergency resources support

### Scope of an Evacuation

The scope of an evacuation can include a single building, a group of buildings, and/or a large geographical area. The scope could go beyond the borders of the institution, and/or the university may be impacted by an evacuation initiated by the local authorities. Size and scope considerations must be included in the overall decision-making process.

### Building Evacuation:

- All building occupants are required to evacuate when the fire alarm sounds or upon the order of an authorized university official, such as a University Police officer.

- If time permits, stabilize lab procedures, turn off stoves and ovens and unplug or disable any device that could make a dangerous situation even worse.
- Move to the closest exit and proceed down the exit stairwell in a safe and orderly manner. Take personal belongings with you. Do not use elevators.
- Remain at least three 300 feet outside of the building and await further instructions. Keep roadways open, and beware of approaching emergency vehicles. Notify emergency responders of anyone trapped, especially anyone with a physical disability.

**Large-Scale Campus Evacuation:**

- If evacuation of part or all of the campus is necessary, monitor text message/voice alert system, email, and the university’s website for additional information.
- Those in need of transportation will be directed to areas to await transport to an off-campus site.

**TESTING, EXERCISE PREPAREDNESS DRILLS AND TABLETOP EXERCISES**

In accordance with the institution’s EOP, NKU will use these procedures and plans for testing emergency notification, response and evacuation.

IRT will perform periodic tabletop exercises in order to practice the implementation of the campus EOP and supplement emergency policies and procedures and to assess and evaluate emergency plan capabilities. Additionally, divisional and department level exercises are regularly initiated to train staff personnel on emergency operations. The Director of Safety and Emergency Management will be responsible for scheduling and conducting these tabletop exercises. As a minimum, one exercise per academic year will occur. Local emergency responders and Campbell County Emergency Management may be invited to participate along with university officials.

**After-Action Reports of Tests/Exercises**

After-action reviews will be conducted following each test and/or exercise that documents the test/exercise, provides

a description for each test/exercise, the date, time and whether the test was announced or unannounced.

**General Residence Hall Fire Safety**

All of Northern Kentucky University’s on-campus residential student housing facilities are completely covered by integrated automatic sprinkler and fire alarm systems, which are monitored 24 hours a day, seven days a week by University Police. All required life-safety equipment including portable fire extinguishers, emergency lighting, emergency exit signs, fire-rated doors and stairways and emergency phones are inspected on a regular basis to ensure that these systems are in working condition. Fire alarm systems are tested annually by a licensed contractor. Automatic sprinkler systems, including all valves, flow alarms and fire pumps, are tested annually by a licensed contractor of the state.

Each resident is given a copy of the Residence Halls Guidebook for Residents, which includes information on fire safety and what appropriate action to take during a fire alarm or fire emergency. All dormitory rooms connected to an interior hallway have an emergency evacuation map installed on the inside of the front door. Fire drills are conducted each semester by Safety and Emergency Management.

**FIRES SHOULD BE IMMEDIATELY REPORTED TO THE UNIVERSITY POLICE.**

If a member of the NKU community finds evidence of a fire, even if extinguished, the community member should immediately notify University Police to investigate and document the incident. For example, if a housekeeper finds evidence of a fire in a trashcan in the hallway of a residence hall, they should not touch the trashcan and should report the incident to University Police immediately and wait for an officer’s response.

Fire alarms alert community members of potential hazards, and community members are required to heed their warning and evacuate buildings immediately upon activation. Use the nearest stairwell and/or exit to leave the building immediately. Do not use the elevator. Community members should familiarize themselves with the exits in each building. University Police can work with other university offices to levy fines and penalties upon

individuals who fail to evacuate a building promptly – but a more important reason for evacuating is for safety!

University Police publishes this fire safety report as part of its annual Clery Act Compliance document, via this annual report, which contains information with respect to the fire safety practices and standards for NKU. This report includes statistics concerning the number of fires, the cause of each fire, the number of injuries and deaths related to a fire and the value of the property damage caused by a fire. The compliance document is available for review 24 hours a day on the University Police website. A physical copy may be obtained by making a request to Safety and Emergency Management (859) 572-6528 or by visiting Lucas Administrative Center 724.

### **Procedures for Students and Employees in the Event of a Fire:**

Activate a pull station as you exit the building, call 911 or contact University Police directly at: (859) 572-7777.

- Shut all doors and windows in the vicinity of the fire.
- Leave the building through the nearest exit.
- Do not use the elevators.
- Do not run.
- If there is smoke in area, keep low to the floor.
- Try to exit the room, feel the doorknob:
  - If it is hot, do not open the door.
  - If the doorknob is not hot, brace yourself against the door and crack it open.
  - If there is heat or heavy smoke, close the door and stay in your room.
- Don't panic.
- Seal up the cracks under the door with sheets or towels.
- If there is smoke in the room, crack the windows at the bottom and at the top, if possible, to allow for ventilation. Hang a sheet or towel from the window to announce that you are in your room.

- Call University Police at (859) 572-7777. Be sure to give your room number and your location.
- If you can exit the room, put on shoes and, if necessary, a coat. If smoke is evident, get a wet towel to cover your face.
- Close all doors.
- If you are blocked by fire when exiting a building, go to the safest fire-free area or stairwell. If a phone is available, call University Police or find a window and signal that you are still in the building.

### **Student Residence Hall Fire Evacuation Procedures in the Event of a Fire:**

- The fire alarm system should be used to evacuate a building(s) if there is a potential threat to the health and safety in the building due to fire.
- Pull a fire alarm station on the way out if the fire alarm is not already sounding.
- Leave the building by using the nearest exit.
- Crawl if there is smoke. Cleaner, cooler air will be near the floor. Get low and go.
- Before opening any doors, feel the metal knob:
  - If it is hot, do not open the door.
  - If it is cool, brace yourself against the door, open it slightly, and if heat or heavy smoke are present, close the door and stay in the room.
- Go to the nearest exit or stairway. If the nearest exit is blocked by fire, heat or smoke, go to another exit.
- Always use an exit stairway, not an elevator.
  - Elevator shafts may fill with smoke or the power may fail, leaving you trapped.
  - Stairway fire doors will keep out fire and smoke (if they are closed) and will protect you until you get outside.

- Close as many doors as possible as you leave. This helps to confine the fire.
- Total and immediate evacuation is safest.
- Only use a fire extinguisher if the fire is very small and you can do so safely and have been trained.
  - Do not delay calling emergency responders or activating the building fire alarm.
  - If you cannot put out the fire, leave immediately.
  - Make sure the fire department is called—even if you think the fire is out.
- If you get trapped, keep the doors closed. Place cloth material (wet, if possible) around and under door to prevent smoke from entering.
- Be prepared to signal your presence from a window.
- Signal for help. Hang an object like a jacket or shirt at the window to attract the fire department’s attention. If there is a phone in the room, call 911, 7777 from an on-campus phone or (859) 572-7777 from a cellular phone and report that you are trapped. Be sure to give your room number and location.
- If all exits from a floor are blocked, go back to your room, close the door, seal any cracks, open the windows if safe, wave something out the window and shout or phone for help.
- If you are on fire, stop, drop and roll wherever you are. Rolling smothers fire.
- Cool burns. Use cool tap water on burns immediately. Don’t use ointments. If skin is blistered, brown or charred, call for an ambulance.
- Be aware of obstacles. Storage of any items in the corridors, such as bicycles, chairs, desks and other items are prohibited in all exit ways, including stairwells. Blocked exits and obstacles impede evacuation, especially during dark and smoky conditions.
- If you are a person with a disability (even temporarily), you should do the following:

- Learn about fire safety.
- Plan ahead for fire emergencies.
- Be aware of your own capabilities and limitations.

## **PLANS FOR FUTURE IMPROVEMENTS IN FIRE SAFETY**

We strive to constantly improve and expand on our in-service training sessions for all students, faculty and staff. Training includes basic fire safety and emergency response topics.

The university continues to assess and upgrade fire safety equipment as an ongoing process, to ensure that all equipment meets national fire safety standards. Future improvements will be made as needed as part of the ongoing assessment and budget process.

## **LIFE SAFETY INSPECTIONS AND VIOLATIONS**

University Housing performs residence hall inspections monthly throughout the year. The inspections are primarily designed to find and eliminate safety violations. Room inspections are typically announced. Inspections of common areas are not always announced. Students are required to read and comply with the residential guidelines, which include life and fire safety rules and regulations for residential buildings.

The inspections include but are not limited to: a visual examination of electrical cords, sprinkler heads, smoke detectors, fire extinguishers and other life safety systems. In addition, each room will be examined for the presence of prohibited items (e.g., sources of open flames, such as candles; non-surge protected extension cords; halogen lamps; portable cooking appliances in non-kitchen areas; etc.) or prohibited activity (e.g., smoking in the room, tampering with life safety equipment, possession of pets, etc.). This inspection will also include a general assessment of food and waste storage and cleanliness of the room.

## PROHIBITED ITEMS AND PROHIBITED CONDUCT

If a student's behavior does not meet university community expectations or is in violation of the policies outlined in the Student Housing License Agreement or the Handbook of Student Conduct, Rights and Advocacy, they may expect conduct action. NKU expects students, as adults, to maintain a standard of personal discipline that is in harmony with the educational goals of the institution, federal, state and local laws, and to respect the rights, privileges and property of fellow students, faculty, staff and administrators. Students are responsible for the items contained in their rooms and the events that occur in their rooms. Special surveillance resources may be utilized by the university when conduct issues become chronic or disruptive.

### Prohibited Items

The following items are prohibited in residence halls:

- Guns; firearms; knives longer than three inches; or weapons of any type, including BB and pellet guns
- Candles and/or incense (lit or unlit)
- Room-heating devices, including all space heaters (unless provided by the department), kerosene or oil lamps and alcohol burners
- Gasoline-powered items, such as motorcycles, mopeds or parts thereof
- Pressurized tanks (e.g., helium tanks)
- Flammable and/or combustible liquids and/or chemicals, including gasoline and charcoal
- Grills of any type (except UL-listed Foreman-style grills in apartments)
- Fireworks, smoke bombs, sparklers, etc.
- Drug paraphernalia and illegal drugs
- Animals or pets of any kind, except certified service animals or non-carnivorous fish. Refer to the university's pet policy in the Student Handbook and on the university website
- Light dimmers, ceiling fans or any other device that replaces, adds to or interferes with any room apparatus
- Excessive furniture that blocks or restricts egress from sleeping areas
- Physical training equipment
- Three-section couches
- Waterbeds
- Dartboards and darts
- Nails, hooks, double-faced adhesive tape or other items that will damage walls
- Live trees at the holidays/Christmas
- Personal lofts
- Hoverboards

The following electrical appliances and corded items are prohibited in residence halls (Note: all cords and permitted appliances must be UL listed):

- Portable and electrical appliances (including toasters, toaster ovens, hot plates, etc.)
- Halogen lamps
- Overloaded electrical receptacles
- Faulty or old extension cords
- Portable washers, dryers and dishwashers
- Air conditioners (except for a certified disability or as provided by the university)

NOTE: The preceding list is not all inclusive. Any item that is a threat to public safety may be removed. In addition to confiscation, violators may pay a monetary fine and may be subject to conduct action under the student's University Housing contract and/or the NKU Code of Rights and Responsibilities.



## Prohibited Conduct

The following activities and actions are prohibited in residence halls and may result in action under the student's University Housing Agreement and/or the NKU Code of Rights and Responsibilities:

- Smoking inside any residential space, (including the use of electronic cigarettes)
- Open flames
- Draping or placing objects, including fabric, over lighting fixtures, smoke detectors or fire sprinkler systems



- Hanging cardboard, plastic or fabric (e.g., tapestries, banners and flags) on walls, ceilings, light fixtures or fire sprinkler apparatus. Posters on walls can't exceed 25 percent of the total wall surface.
- Hanging stringed lights on the exterior of buildings without the advance, expressed, written consent of the University Housing. Inside residence halls, students may use up to three strands of stringed lights per room; all stringed lights must be UL approved.
- Wrapping or placing wires or stringed lights in the area of beds
- Lending keys to others, copying keys, possession of keys that are not authorized for your use
- Water fights, ball playing, bike riding or similar activities that may cause harm to persons or property

- Storage of bicycles in stairwells, halls or rooms
- Storage of personal items such as sports bags/ equipment, furniture or suitcases in stairwells or halls
- Throwing any items into or out of windows
- Altering, tampering or dismantling any door closure or propping open any exterior door
- Cooking food in individual rooms (other than in micro-fridges)
- Solicitation of goods or services, except by NKU students who have received prior approval from Housing
- Painting, wallpapering or similarly decorating individual rooms or common areas, unless prior approval is given by Housing
- Repairing any damages or the removal or replacement of light bulbs in ceiling fixtures that have not been provided by the Facilities staff
- Removal, destruction, disassembling or altering of any furniture in a room
- Removing screens from windows
- Installing wall partitions or paneling
- Modifying or tampering with circuit breakers or any part of the electrical system
- Installing personal locks or chains on doors or windows
- Sleeping in public areas of the residence halls by residents and/or guests
- Entering the Quarry pond—also referred to as Loch Norse—to wade, swim or ice skate.

## EMERGENCY EVACUATION DRILLS

Every fire that is not known to be accidental (such as a cooking fire) is investigated by a Central Campbell County Fire Department and the Kentucky State Fire Marshall. Fires determined through investigation to be willfully or maliciously set are classified as arsons for Clery reporting purposes.

## FIRE INVESTIGATIONS/ARSON

Every fire that is not known to be accidental (such as a cooking fire) is investigated by a Central Campbell County Fire Department and the Kentucky State Fire Marshal. Fires determined through investigation to be willfully or maliciously set are classified as arsons for Clery reporting purposes.

## COMMUNITY ENGAGEMENT

NKUPD is dedicated to building and maintaining a safe and inclusive environment that is mission-driven and values-based. Our philosophy in building and maintaining trust is through collaboration and partnerships with the community we serve. We believe one of the most important initiatives to ensure that NKU police officers are fully capable of serving the entire NKU community is by insisting on professionalism, a willingness to lead, listen and learn. We have proven that community engagement encourages positive interactions and relationships outside the context of addressing crime or stressful encounters. More importantly, our approach towards community engagement increases interactions that are fun, informative, positive, and productive. We see ourselves as leaders, problem solvers, and stewards of the community. In every task and duty, we will continue to build trust within the community. We seek to create an environment in which it is safe to speak up. Where people are expected to take pride and responsibility for their own actions and duties. We seek to promote a diverse, inclusive, supportive, professional and empathetic culture. We will continue to evaluate and monitor these aspects of culture in our department to ensure we are providing the best outcomes for all members of the NKU Community.

## MENTAL HEALTH ADVISORY GROUP

The NKU Mental Health Advisory Group (MHAG) is an organization tasked with addressing mental health concerns raised by university constituents. The MHAG is composed of individuals with a myriad of roles and responsibilities in the NKU community, all of whom can offer unique insights into the issues present and contribute

valuable perspectives to a campus-wide response. As part of the university's Student Mental Health Initiative, the MHAG has been tasked with:

- Building awareness about the mental health resources available at NKU.
- Assessing gaps and unmet needs in student mental health support services.
- Soliciting partnerships and external support for key initiatives directed at addressing the stressors students face.

Recognizing that promoting student success requires attending to the wellness of the staff and faculty members with whom students engage. MHAG expanded its exploratory efforts to determine staff and faculty's awareness of and experiences with mental health and well-being. The intent was to create a more comprehensive picture of mental health at NKU.

Surveys conducted with university constituents found students, staff and faculty struggle with mental health issues. Sixty-five percent of participating NKU students reported some degree of need for help with mental health or emotional problems within the past 12 months. Likewise, nearly 60 percent of staff and faculty respondents shared that, in the past year, they could have received help for symptoms equated with depression and anxiety.

## BIAS INCIDENT RESPONSE TEAM

Northern Kentucky University's Bias Incident Response Protocol advances NKU's commitment to create and maintain a university climate free of discrimination and to promote a learning and living environment for students, administrators, faculty and staff that is safe, inclusive, welcoming and respectful. The Protocol provides notification to the university of bias-motivated incidents and a process to address bias-motivated incidents that impact NKU students, administrators, faculty and staff. The purpose of the Bias Incident Response Team (BIRT) is to provide support and outreach, education, and resources to individual students and/or groups of students, administrators, faculty and staff who have been impacted

by a bias-motivated incident. Additionally, the BIRT may recommend training, mediation, restorative justice, or campus-wide discussions on concerns related to the bias incident.

## NKU APP

NKU has a free phone app which is available to students, staff, faculty, parents and the public. The app contains several safety information with the following safety features:

- **Emergency Contacts:** Provides the caller with a convenient way to contact University Police.
- **Destination Safe:** University Police offers a 24/7, safety escort service for individuals who feel unsafe walking alone to their vehicle, office, dorm or other campus location.
- **Personal Safety Tips:** The personal safety tip offers numerous topics of safety including, alcohol and drugs, car safety, on-and off-campus living and more.
- **Crime Tips:** Crime tips are to enhance security on campus and in the campus community as well as a crime tip-reporting service.
- **Emergency Action Plan:** Provides general guidance on how to respond to emergencies that occur on campus.

## BLUE LIGHT EMERGENCY CALLBOX PHONES

Exterior emergency call phones linked directly to University Police are located in 65 locations throughout campus. The phones are easily recognized by the blue light above each phone. To operate, simply push the red button, and you will be connected directly with University Police. Your location is displayed automatically in the dispatch center. These phones should only be used for emergencies and for reporting crimes or suspicious activity. You can view locations online ([nku.edu/safety](http://nku.edu/safety)).

## CRIME LOG

This log contains specific incident information including reports taken and arrest made as by University Police as well as incidents reported by CSAs. This log is updated every 24 hours, Monday through Friday. Additionally, a printed crime log is available for viewing at all times at University Police. The university's crime log can be found online ([nku.edu/police/crimelog](http://nku.edu/police/crimelog)).

## RESIDENCE HALL PROGRAMS

Programs are offered for students and residence hall staff to address security and safety measures in the residence halls, as well as educate students on co-curricular topics. Some of these programs include self-defense and personal safety, drugs and alcohol and other topics.

## FIRE SAFETY

Training is provided to all Residence Hall directors and resident assistants. Each resident assistant is responsible for covering fire safety during floor meetings throughout the semester. Fire safety training is available to all faculty, staff and students through Safety and Emergency Management. For more information, visit the website ([nku.edu/safety](http://nku.edu/safety)).

## TRAINING OF RESIDENCE HALL STAFF

The University Police chief, lieutenant, Clery Compliance coordinator personnel, director of University Housing and director of Safety and Emergency Management provide annual security and life-safety training. This training minimally includes introduction of officers, description of services offered, instruction on fire safety hazards and building evacuation, instruction on the EOP and emergency notification system, training related to the Clery Act and CSAs, Title IX awareness training and general information on requesting emergency assistance from University Police.

Other related training conducted for the resident assistants by members of University Police includes locking buildings, responding to fire alarms and other crisis response procedures. Several times each academic year, University Police officers are invited into each residential community to conduct informal meetings with students on security and enforcement procedures.

## WEAPONS POLICY

NKU police officers are armed and carry firearms, tasers, batons, handcuffs and pepper spray. Outside law enforcement personnel who are authorized to possess weapons may do so within the scope of their authority. No other persons are permitted to possess weapons on university property, even if such weapons are legally registered. NKU is committed to maintaining a safe and secure environment that supports the academic mission of the university.

According to the NKU Firearms, Explosives, Deadly Weapons and Dangerous Instrumentalities Policy, members of the NKU community, including students, faculty and staff, as well as visitors to any NKU campus location, are prohibited from possession of firearms, explosives, weapons or any item that may be construed as such, on the premises of the university or in any building under university control. There are some limited exceptions to this policy. For example, certified and licensed law enforcement personnel who are authorized to carry a firearm are permitted to do so while on NKU property. All members of the NKU community should refer to the Firearms, Explosive, Deadly Weapons and Dangerous Instrumentalities Policy, which is available at the university's Office of Policy Administration website ([nku.edu/policy](http://nku.edu/policy)).

## JEANNE CLERY DISCLOSURE OF CAMPUS SECURITY POLICY AND CAMPUS CRIME STATISTICS ACT, AS AMENDED BY THE VIOLENCE AGAINST WOMEN REAUTHORIZATION ACT OF 2013

### SEXUAL HARASSMENT POLICIES, SERVICES, RESOURCES AND PROTOCOLS

NKU is committed to fostering a safe and inclusive educational and work environment free from sexual harassment, including sexual assault, dating and domestic violence, stalking, and other sex-based offenses. These behaviors are forms of sex discrimination in that they deny or limit an individual's ability to participate in or benefit from university educational programs or activities and employment.

NKU prohibits the offenses of domestic violence, dating violence, sexual assault and stalking (as defined by the Clery Act) and reaffirms its commitment to maintaining a campus environment that emphasizes the dignity and worth of all members of the university community. NKU issues this statement of policy to inform the campus community of our programs to address domestic violence, dating violence, sexual assault and stalking as well as the procedures for institutional disciplinary action in cases of alleged dating violence, domestic violence, sexual assault or stalking. NKU's [Sexual Harassment Policy](#) can be accessed on the Office of Policy Administration website ([nku.edu/policy](http://nku.edu/policy)).

### Clery Act/VAWA Definitions of Domestic Violence, Dating Violence, Sexual Assault and Stalking

The Clery Act defines the crimes of domestic violence, dating violence, sexual assault and stalking as follows: a felony or misdemeanor crime of violence committed—

- By a current or former spouse or intimate partner of the victim;
- By a person with whom the victim shares a child in common;

- By a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner;
- By a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; or
- By any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

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

### Definition of a Crime of Violence

According to Section 16 of Title 18 of the United States Code, the term crime of violence means:

- An offense that has as an element of the use, attempted use or threatened use of physical force against the person or property of another; or
- Any other offense that is a felony and that, by its nature, involves a substantial risk that physical force against the person or property of another may be used in the course of committing the offense

### Dating Violence

Dating violence is violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship and the frequency of interaction between the persons involved in the relationship.

- i. For the purposes of this definition—
  - A. Dating violence includes but is not limited to sexual or physical abuse or the threat of such abuse.
  - B. Dating violence does not include acts covered under the definition of domestic violence.
- ii. For the purpose of complying with the requirements of this section and 668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act Reporting.



### Sexual Assault

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

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

- **Fondling:** the touching of the private parts of another person for the purposes of sexual gratification without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.
- **Incest:** sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
- **Statutory Rape:** sexual intercourse with a person who is under the statutory age of consent.

### Stalking

Engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- Fear for the person’s safety or the safety of others; or
- Suffer substantial emotional distress

For the purposes of this definition:

- Course of conduct: two or more acts, including but not limited to: acts which the stalker directly, indirectly or through third parties, by any action, method, device, or means follows, monitors, observes, surveils, threatens or communicates to or about, a person or interferes with a person’s property.
- Reasonable person means a reasonable person under similar circumstances and with similar identities to the victim.
- Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

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

## JURISDICTIONAL DEFINITIONS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT AND STALKING

### SEXUAL ASSAULT

**The Commonwealth of Kentucky defines sexual assault as follows:**

- Rape: a person is engaging in sexual intercourse with another person by forcible compulsion; or engages in sexual intercourse with another person who is incapable of consent because he or she is an individual with an intellectual disability; the person is physically helpless, mentally incapacitated or is a minor.
- Penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim. Statutory offenses (no force used–victim under age of consent) are excluded.
- Sex offenses (except rape, prostitution and commercialized vice): statutory rape, offenses against chastity, common decency, morals and the like. Attempts are included.

### DOMESTIC VIOLENCE/ABUSE

**Kentucky law (KRS §403.720) defines domestic violence and abuse as:**

1. Physical injury, serious physical injury, sexual abuse, assault or the infliction of fear of imminent physical injury, serious physical injury, sexual abuse or assault between family members or members of an unmarried couple.
2. “Family member” means a spouse, including a former spouse, a grandparent, a parent, a child, a stepchild or any other person living in the same household as a child if the child is the alleged victim.
3. “Member of an unmarried couple” means each member of an unmarried couple which allegedly

has a child in common, any children of that couple or a member of an unmarried couple who are living together or have formerly lived together.

## DATING VIOLENCE

**The Commonwealth of Kentucky defines Dating Relationship and Dating violence and abuse in KRS §456.010 as:**

1. "Dating relationship" means a relationship between individuals who have or have had a relationship of a romantic or intimate nature. It does not include a casual acquaintanceship or ordinary fraternization in a business or social context. The following factors may be considered in addition to any other relevant factors in determining whether the relationship is or was of a romantic or intimate nature:
  - (a) Declarations of romantic interest
  - (b) The relationship was characterized by the expectation of affection
  - (c) Attendance at social outings together as a couple
  - (d) The frequency and type of interaction between the persons, including whether the persons have been involved together over time and on a continuous basis during the course of the relationship
  - (e) The length and recency of the relationship
  - (f) Other indications of a substantial connection that would lead a reasonable person to understand that a dating relationship existed
2. "Dating violence and abuse" means physical injury, serious physical injury, stalking, sexual assault or the infliction of fear of imminent physical injury, serious physical injury, sexual abuse or assault occurring between persons who are or have been in a dating relationship

## STALKING

**The Commonwealth of Kentucky law defines stalking in (KRS §508.130) as:**

- A. To "stalk" means to engage in an intentional course of conduct:
  1. Directed at a specific person or persons;
  2. Which seriously alarms, annoys, intimidates or harasses the person or persons; and
  3. Which serves no legitimate purpose.
- B. The course of conduct shall be that which would cause a reasonable person to suffer substantial mental distress.

## CONSENT

**The Commonwealth of Kentucky defines lack of consent in KRS 510.020 as:**

1. Whether or not specifically stated, it is an element of every offense defined in this chapter that the sexual act was committed without the consent of the victim.
2. Lack of consent results from:
  - a. Forcible compulsion
  - b. Incapacity to consent or
  - c. If the offense is charged is sexual assault, any circumstances in addition to forcible compulsion or incapacity in which the victim does not expressly or impliedly acquiesce in the actor's conduct.
3. A person is deemed incapable of consent when he or she is:
  - a. Less than 16 years old
  - b. An individual with an intellectual disability or an individual that suffers from a mental illness
  - c. Mentally incapacitated
  - d. Physically helpless

- e. Under the care or custody of a state or local agency pursuant to court order and the actor is employed by or working on behalf of the state or local agency.

## NKU'S DEFINITION OF CONSENT

**Consent:** is clear, knowing, and voluntary. Consent is active, not passive. Silence, in and of itself, cannot be interpreted as consent. Verbal consent is not a requirement of this Policy; however, consent may be given by words as long as those words create mutually understandable clear permission regarding willingness to engage in sexual activity. Consent to any one form of sexual activity cannot alone imply consent to any other forms of sexual activity. Previous relationships or prior consent cannot imply consent to future sexual acts. Silence or the absence of resistance alone is not consent. Consent is not demonstrated by the absence of resistance.

**Coercion:** is unreasonable pressure for sexual activity. Coercive conduct differs from seductive conduct based on factors such as the type and/or extent of the pressure used to obtain consent. When someone makes clear that they do not want to engage in certain sexual activity, that they want to stop, or that they do not want to go past a certain point of sexual interaction, continued pressure beyond that point can be coercive.

## HOW TO BE AN ACTIVE BYSTANDER

Bystander intervention means safe and positive options that may be carried out by an individual or individuals to prevent harm or intervene when there is a risk of dating violence, domestic violence, sexual assault or stalking. Bystander intervention includes recognizing situations of potential harm, understanding institutional structures and cultural conditions that facilitate violence, overcoming barriers to intervening, identifying safe and effective intervention options and taking action to intervene.

Bystanders play a critical role in the prevention of sexual and relationship violence. They are "individuals who observe violence or witness the conditions that perpetuate violence. They are not directly involved but have the choice

to intervene, speak up or do something about it." NKU wants to promote a culture of community accountability where bystanders are actively engaged in the prevention of violence without causing further harm. We may not always know what to do even if we want to help. If you or someone else is in immediate danger, call University Police at (859) 572-5500 or the local police by dialing 911.

### Tips on how to be an active bystander.

- Watch out for your friends and fellow students/ employees. If you see someone who looks like they could be in trouble or need help, ask if they are OK.
- Intervene in situations where a person is attempting to seclude, hit on or trying to engage in sexual contact with people who are incapacitated. Speak up when someone discusses plans to take sexual advantage of another person.
- Believe someone who discloses sexual assault, abusive behavior or experience with stalking.
- Refer people to campus and/or community resources listed in this document for support in health, counseling or with legal assistance.

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

*2 Bystander intervention strategies adapted from Stanford University's Office of Sexual Assault & Relationship Abuse*

## FOSTERING SAFE ENVIRONMENTS

As a community and as individuals, we can work to foster safer environments to mitigate opportunities for harm to occur. There are many ways this can look on both a broader community scale and through individual actions. The following are strategies individuals can practice with the goal of fostering safe environments for everyone:

- Be conscious of your actions and decisions. Practice consent in all interpersonal interactions and support and uplift others to practice consent as well.



- If someone discloses an incident of violence to you, listen and support them. If you are not capable or uncomfortable doing so, connect them to campus and/or community resources.
- Evaluate your personal limits and boundaries and communicate those boundaries with others. Listen and respect others' boundaries as well.
- Be true to yourself. Don't feel obligated to do anything you don't want to do. "I don't want to" is always a good enough reason. Do what feels right and comfortable to you and encourage and support others to do the same.
- Be aware of your surroundings for both your personal safety and the safety of others. If something seems off, speak up! If you are not in a position to do so, enlist help.
- Trust your instincts. If you feel unsafe in any situation, go with your gut. If you see something suspicious, contact University Police immediately. Local authorities can be reached by calling 911 in most areas of the U.S.
- Familiarize yourself with campus and community resources listed in this document.

## ONLINE DATING

Online dating has become the new norm for meeting potential partners. There are new dating apps daily, and each app follows different policies and procedures. While there is a risk of potential harm within dating apps, most have blocking and reporting guidelines to help mitigate risk. Thus, communication may feel safer and easier within the app itself. Moving the conversation off the app and into person to person contact can at times feel intimidating and/or raise concerns of potential danger. The following are strategies for safe online and in person dating:

- First and foremost, understand the app you are using. Read the reporting and blocking guidelines as well as the in app communication functions.
- Take preventative measures when creating your profile within an app, such as limiting use of location settings,

using caution when supplying identifying information (i.e birthday, workplace, or personal social media accounts), and using a Google voice number rather than sharing your personal contact information.

- Use photos on your profile that are different from the ones posted on your main social media accounts to make it harder for people to find you online.
- Don't be afraid to set boundaries around sharing personal information with people.
- Don't feel obligated to talk to someone if they make you feel uncomfortable or unsafe.
- Avoid suspicious accounts that have no bio or photos of themselves. Avoid conversations in which individuals are asking for money and potential identifying information as it could indicate a scam account.
- Before meeting in person, connect with the person via a phone call, Facetime, Snapchat etc. to ensure the person is who you believe them to be.
- Know and identify your limits and boundaries before the date begins, and reiterate boundaries as needed.
- Agree to meet in a public location for your first date, and provide your own transportation.
- Create a safety plan with close friends or loved ones who you're comfortable knowing about the date. Create a safe word that you can text or say to enact a plan to remove you from the date. Share your date details (time, location, etc.) and/or consider sharing your location through your phone.
- Trust your gut; if you feel your boundaries have been crossed or feel uncomfortable in any way, remove yourself from the situation.
- If you are not comfortable removing yourself, do not be afraid to enlist help from those around you. There are various local restaurants, bars, and coffee shops that require annual training for their staff on bystander intervention. For a list of trained businesses, reach out to Norse Violence Prevention at [nvp@nku.edu](mailto:nvp@nku.edu).

**If you need to get out of an uncomfortable or scary situation, here are some things to keep in mind**

- Remember that being in this situation is not your fault. You did not do anything wrong. It is the person who is making you uncomfortable that is to blame.
- Be true to yourself. Don't feel obligated to do anything you don't want to do. "I don't want to" is always a good enough reason. Do what feels right to you and what you are comfortable with.
- Have a code word with your friends or family so that if you don't feel comfortable you can call them and communicate your discomfort without the person you are with knowing. Your friends or family can then come to get you or make up an excuse for you to leave.
- Lie. If you don't want to hurt the person's feelings, it is better to lie and make up a reason to leave than to stay and be uncomfortable, scared or worse. Some excuses you could use are: needing to take care of a friend or family member, not feeling well, having somewhere else you need to be, etc.
- Try to think of an escape route. How would you try to get out of the room? Where are the doors? Windows? Are there people around who might be able to help you? Is there an emergency phone nearby?
- If you and/or the other person have been drinking, you can say that you would rather wait until you both have your full judgment before doing anything you may regret later.

### **Programs to Prevent Domestic Violence, Dating Violence, Sexual Assault and Stalking**

- Are culturally relevant, inclusive of diverse communities and identities, sustainable, responsive to community needs and informed by research, or assessed for value, effectiveness or outcome; and
- Consider environmental risk and protective factors as they occur on the individual, relationship, institutional, community and societal levels.

### **Primary Prevention and Awareness Programs**

NKU provides primary prevention and awareness programs to all incoming students and employees that involves the

distribution of educational materials to new students, participating in and presenting information and materials during new student and employee orientations, providing programs by invitation at staff meetings or academic programs and requiring incoming first-year students to take online courses related to sexual assault, high risk drinking awareness and education.

### **Ongoing Prevention and Awareness Campaigns**

The university provides an annual educational campaign for all students and employees designed to provide ongoing education and programming around issues of sexual violence—including sexual assault, domestic violence, dating violence and stalking. Campaign strategies employed include face-to-face presentations, online training programs, printed materials, self-defense programming and related lectures.

Ongoing prevention and awareness campaigns include self-defense programming; domestic violence month events and activities; sexual assault awareness month events and activities, which include presentations and an annual Take Back the Night event; ongoing bystander intervention workshops; programming specific to developing healthy relationships; regular student conversations related to sexual assault and relationship violence; and programs from the Norse Violence Prevention Center, LGBTQA+ Student Initiatives, and other university offices.

The following are some specific examples of annual programs currently offered by the university. This list is not all inclusive.

**Online Education:** Online education is coordinated through the Office of Title IX.

**Orientation Programming:** Incoming first-year students participate in a series of information sessions about the Clery Act and Title IX, in addition to learning about the Sexual Harassment Policy, consent, bystander intervention and support resources.

**University Liaison Programming:** University Police officers are assigned liaison activities with students for the purpose of concentrated crime prevention and security awareness programming. In addition to general crime prevention programming, University Police officers are available to provide sexual assault, domestic violence, self-defense, dating violence and stalking awareness programs for these students.

**Bystander Intervention Workshops:** Bystander

Intervention presentations help people identify potentially harmful situations, understand barriers to intervening and provide tools to intervene. Bystander intervention workshops include interactive skill-building activities so participants leave with practical skills to intervene.

**PROCEDURES VICTIMS SHOULD FOLLOW IF A CRIME OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT AND STALKING OCCURS**

After an incident of sexual assault, dating violence or domestic violence, the victim should consider seeking medical attention as soon as possible. St. Elizabeth Hospital in Ft. Thomas is the nearest hospital to NKU and they have sexual assault nurse examiners, also known as SANE nurses, who are certified in physical evidentiary recovery kit collection. **Evidence can be collected even if you choose not to make a report to law enforcement.**

If a sexual assault victim does not currently wish to involve police, there is still an option to have the forensic evidence collected in a timely manner. As time passes, evidence may dissipate or become lost or unavailable, thereby making investigation, possible prosecution, disciplinary proceedings or obtaining protection from abuse orders related to the incident more difficult. It is important that a victim of sexual assault not bathe, douche, smoke, change clothing or clean the bed/linen/area where they were assaulted if the offense occurred within the past 96 hours so that evidence may be preserved that may assist in proving that the alleged criminal offense occurred/or is occurring, or may be helpful in obtaining a protection order. In circumstances of sexual assault, if victims do not opt for forensic evidence collection, health care providers can still treat injuries and take steps to address concerns of pregnancy and/or sexually transmitted infections. Victims of sexual assault, domestic violence, stalking and dating violence are encouraged to also preserve evidence by saving text messages, instant messages, social networking pages, other communications and keeping pictures, logs or other copies of documents, if they have any, that would be useful to university adjudicators/investigators or local police.

**INVOLVEMENT OF LAW ENFORCEMENT AND CAMPUS AUTHORITIES**

Although the university strongly encourages all members of its community to report violations of this policy to University Police, it is the victim's choice whether or not to make such a report. Furthermore, victims have the right to decline to notify law enforcement. However, University Police will assist any victim if the victim so desires.

**Reporting Incidents of Domestic Violence, Dating Violence, Sexual Assault, Stalking and Other Sex-Based Offenses**

If you have been the victim of domestic violence, dating violence, sexual assault, stalking, or other behavior prohibited by NKU's [Sexual Harassment Policy](#), you should report the incident promptly to the Office of Title IX. Reports can be submitted online at <https://inside.nku.edu/titleix.html>, or by contacting the Title IX Investigator, Morgan Keilholz, in person at University Center 330, by email at [keilholzm1@nku.edu](mailto:keilholzm1@nku.edu) or by phone at (859) 572-7669.

Reports do not automatically initiate the university's obligation to investigate the allegation, but may place the university on notice that sexual harassment may be occurring. Because reporting carries no obligation to initiate the formal grievance process, the victim remains largely in control and should not be deterred from submitting a report which allows the university to provide supportive measures.

A victim may request that the university investigate allegations of sexual harassment by filing a formal complaint, which is a signed document alleging policy violation(s) and requesting that the university investigate. A written formal complaint may be filed with Title IX Coordinator in person, by email, US mail, or using the University's online portal provided for this purpose found at <https://inside.nku.edu/titleix/report/formal-complaint>. A Complainant's signature can be physical or digital, or otherwise indicate that the Complainant is the person filing the Complaint.

## **PROCEDURES THE UNIVERSITY WILL FOLLOW WHEN A CRIME OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT AND STALKING IS REPORTED**

The university has procedures in place that serve to be sensitive to victims who report sexual assault, domestic violence, dating violence and stalking—including informing individuals about their right to file criminal charges as well as the availability of counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, and other services on and/or off campus; as well as additional remedies to prevent contact between a complainant and an accused party, such as housing, academic, transportation and working accommodations, if reasonably available. The university will make such accommodations if the victim requests them and, if they are reasonably available, regardless of whether the victim chooses to report the crime to the University Police or local law enforcement.

If a report of domestic violence, dating violence, sexual assault or stalking is reported to NKU, below are the procedures that the university will follow.



***“Our role is to make sure every student, employee, and visitor feel welcome and valued. We don't want to be just police officers in the community. We want to be part of the community that is trusted and significant in the support and growth of the community.”***

**- LT. LOVE**

Reported Incident	Procedures Institution Will Follow
<b>Sexual Assault</b>	<ul style="list-style-type: none"> <li>• Institution will provide victim with information about obtaining medical care.</li> <li>• Institution will assess immediate safety needs of victim.</li> <li>• Institution will assist victim with contacting local police if complainant requests and provide the victim with contact information for local police department.</li> <li>• Institution will provide victim with referrals to on- and off-campus mental health providers.</li> <li>• Institution will assess need to implement interim or long-term protective measures, if appropriate.</li> <li>• Institution will provide the victim with a written explanation of the victim’s rights and options.</li> <li>• Institution will provide a “No trespass” or “No Contact” directive to accused party if deemed appropriate.</li> <li>• Institution will provide a copy of the policy applicable to sexual assault to the victim and inform the victim regarding timeframes for inquiry, investigation and resolution.</li> <li>• Institution will inform the victim of the outcome of the investigation, whether or not the accused will be administratively charged and what the outcome of the hearing is.</li> <li>• Institution will enforce the anti-retaliation policy and take immediate and separate action against parties that retaliate against a person for reporting sex-based discrimination or for assisting in the investigation.</li> </ul>
<b>Stalking</b>	<ul style="list-style-type: none"> <li>• Institution will assess immediate safety needs of victim.</li> <li>• Institution will assist victim with contacting local police if complainant requests and provide the victim with contact information for local police department.</li> <li>• Institution will assess need to implement interim or long-term protective measures to protect the victim, if appropriate.</li> <li>• Institution will provide the victim with a written explanation of the victim’s rights and options.</li> <li>• Institution will provide a “No trespass” or “No Contact” directive to accused party if deemed appropriate.</li> </ul>

<p><b>Dating Violence</b></p>	<ul style="list-style-type: none"> <li>• Institution will assess immediate safety needs of victim.</li> <li>• Institution will assist victim with contacting local police if victim requests and provide the victim with contact information for local police department.</li> <li>• Institution will assess need to implement interim or long-term protective measures to protect the victim, if appropriate.</li> <li>• Institution will provide the victim with a written explanation of the victim’s rights and options.</li> <li>• Institution will provide a “No-trespass” or “No-contact” directive to accused party if deemed appropriate.</li> </ul>
<p><b>Domestic Violence</b></p>	<ul style="list-style-type: none"> <li>• Institution will assess immediate safety needs of victim.</li> <li>• Institution will assist victim with contacting local police if victim requests and provide the victim with contact information for local police department.</li> <li>• Institution will assess need to implement interim or long-term protective measures to protect the victim, if appropriate.</li> <li>• Institution will provide the victim with a written explanation of the victim’s rights and options.</li> <li>• Institution will provide a “No-trespass” or “No-contact” directive to accused party if deemed appropriate.</li> </ul>

**EMPLOYEE ASSISTANCE PROGRAM**

NKU also provides an Employee Assistance Program (EAP) for use by employees. The EAP is available to provide full-time employees assistance with such problems as sexual or physical abuse, depression, marital and relationship conflict, stress, grief, critical incident stress, anxiety and other personal matters. The contact number of the EAP is listed in the resources section of this annual report.

All information relating to an employee’s EAP participation is strictly confidential. Only the EAP provider maintains records. The provider does not release specific information about an employee’s use of EAP services unless the employee gives his or her advance written consent. The EAP does not report incidents to any official on-campus resources unless the employee specifically gives them permission to do so.

**ASSISTANCE FOR VICTIMS - RIGHTS & OPTIONS:**

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

Such written information will include:

- The procedures victims should follow if a crime of dating violence, domestic violence, sexual assault or stalking has occurred
- Information about how the institution will protect the confidentiality of victims and other necessary parties
- Information about victim services in the institution and in the community

- A statement regarding the institution’s provisions about options for, available assistance in and how to request accommodations and protective measures
- An explanation of the procedures for institutional disciplinary action

## RIGHTS OF VICTIMS AND THE INSTITUTION’S RESPONSIBILITIES FOR ORDERS OF PROTECTION, “NO CONTACT” ORDERS, RESTRAINING ORDERS, OR SIMILAR LAWFUL ORDERS ISSUED BY A CRIMINAL, CIVIL, OR TRIBAL COURT OR BY THE INSTITUTION

### **NKU complies with the Commonwealth of Kentucky state law in recognizing orders of protection.**

Any person who obtains an order of protection from Kentucky or any reciprocal state should provide a copy to University Police and the Office of Title IX. A complainant may then meet with University Police, the Norse Violence Prevention and the Office of Title IX to develop a Safety Action Plan, which is a plan for University Police and the victim to reduce the risk of harm while on campus or coming and going from campus. This plan may include but is not limited to: escorts, special parking arrangements, providing a temporary cellphone, changing classroom/ work site location, working with Academic Advising on alternative class possibilities, allowing a student to complete assignments from home, allowing an employee to develop a flexible work schedule, etc. The university cannot apply for a legal order of protection, no-contact order or restraining order for a victim from the applicable jurisdiction(s).

In Kentucky, a victim of domestic violence, dating violence, sexual assault or stalking has the right to file a petition with the courts requesting protection through EPOs, DVOs and/ or IPO, which could include the following:

- An order restraining the abuser from further acts of abuse;
- An order directing the abuser to leave the victim’s household/place of residence;
- An order directing the abuser to refrain from stalking or harassing the victim or other designated persons;
- Other protections based on issues related to cohabitation, residency, employment and child custody.

### **Accommodations and Protective Measures Available for Victims:**

NKU will provide written notification to students and employees about accommodations available to them—including academic, living, transportation and working situations—upon receipt of a report of domestic violence, dating violence, sexual assault or stalking. The written notification will include information regarding the accommodation options, available assistance in requesting accommodations and how to request accommodations and protective measures (i.e., The notification will include the name and contact information for the individual or office that should be contacted to request the accommodations.).

At the victim’s request, and to the extent of the victim’s cooperation and consent, university offices will work cooperatively to assist the victim in obtaining accommodations. If reasonably available, a victim may be offered changes to academic, living, working or transportation situations regardless of whether the victim chooses to report the crime to law enforcement.

Examples of options for a potential change to the academic situation may be to transfer to a different section of a class, withdraw and take a class at another time if there is no option for moving to a different section, etc. Potential changes to living situations may include moving to a different room or residence hall. Possible changes to work situations may include changing working hours. Possible changes in transportation may include having the student or employee park in a different location, assisting the student or employee with a safety escort, etc. Issuance of a full, partial, or modified trespass to the respondent may also be appropriate.

To request changes to academic, living, transportation and/or working situations or protective measures, a victim should contact the Office of Title IX at (859) 572-7669 or by visiting University Center 330.

If the victim wishes to receive assistance in requesting these accommodations, the victim should contact the Title IX coordinator and/or the University Police.

**Confidentiality**

Victims may request that directory information on file with the university be withheld by request. This request can be made to the Office of the Registrar in person by visiting Lucas Administrative Center 301 or by calling (859) 572-6094. Employees can contact the Office of Human Resources to make a similar request regarding directory information at (859) 572-5200.

Regardless of whether a victim has opted-out of allowing the university to share directory information, personally identifiable information about the victim and other necessary parties will be treated as confidential and only shared with persons who have a specific need-to-know; i.e., those who are investigating/adjudicating the report or those involved in providing support services to the victim, including accommodations and protective measures. By only sharing personally identifiable information with individuals on a need-to-know basis, the institution will maintain as confidential any accommodations or protective measures provided to the victim, to the extent that maintaining such confidentiality would not impair the ability of the institution to provide the accommodations or protective measures.

The university does not publish the name of crime victims or other identifiable information regarding victims in the daily crime and fire log or in the annual crime statistics that are disclosed in compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act. Furthermore, if a campus crime alert or timely warning notice is issued on the basis of a report of domestic violence, dating violence, sexual assault or stalking, the name of the victim and other personally identifiable information about the victim will be withheld. This could include the specific location where an incident is reported to have occurred when reporting the location could inadvertently identify the victim.

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

NKU will provide written notification to students and employees about existing assistance with and/or information about obtaining resources and services—including counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid and assistance in notifying appropriate local law enforcement—upon receipt of a report of domestic violence, dating violence, sexual assault or stalking. If a sexual assault or rape should occur on campus, on-scene staff, including University Police, will offer the victim a wide variety of services. This information regarding resources is not provided to infer that those resources are crime-reporting entities for NKU.

These resources include the following:

ON-CAMPUS	Employees	Students
Counseling / Mental Health / Health Services	Employee Assistance Program Website: <a href="http://mylifevalues.com">mylifevalues.com</a> Phone: 1-888-AETNA-EAP (1-888-238-6232)	Office of Health, Counseling and Wellness Center Website: <a href="http://nku.edu/hcsw">nku.edu/hcsw</a> Phone: (859) 572-5650  (Can make recommendations for local confidential counseling and psychiatric services in the local area)



Title IX Coordinator	<p>Title IX Coordinator</p> <p>Darryl Peal</p> <p>Lucas Administrative Center, Room 824</p> <p>Phone: (859) 572-6630</p> <p>Email: <a href="mailto:peald1@nku.edu">peald1@nku.edu</a></p> <p>Director of Employee Relations and EEO</p> <p>Lucas Administrative Center, Room 723</p> <p>Phone: (859) 572-5200</p> <p>Email: <a href="mailto:hr@nku.edu">hr@nku.edu</a></p>	<p>Title IX Coordinator</p> <p>Darryl Peal</p> <p>Lucas Administrative Center, Room 824</p> <p>Phone: (859) 572-6630</p> <p>Email: <a href="mailto:peald1@nku.edu">peald1@nku.edu</a></p> <p>Title IX Investigator</p> <p>Morgan Keilholz</p> <p>University Center, 330C</p> <p>Phone: (859) 572-7669</p> <p>Email: <a href="mailto:keilholzm1@nku.edu">keilholzm1@nku.edu</a></p> <p><a href="http://nku.edu/titleix">nku.edu/titleix</a></p>
International Admissions		<p>International Student Services (ISSS)</p> <p>Phone: (859) 572-6517</p>
Student Financial Assistance		<p>Financial Aid Office</p> <p>Phone: (859) 572-5143</p>
LGBTQA+ Student Initiatives		<p>LGBTQ Programs and Services Office</p> <p>Phone: (859) 572-6684</p>
Norse Violence Prevention		<p>Norse Violence Prevention Center</p> <p>Albright Health Center, Suite 246</p> <p>Email: <a href="mailto:nvp@nku.edu">nvp@nku.edu</a></p> <p>Phone: (859) 572-5865</p>
University Police	<p>Non-emergency phone: (859) 572-5500</p> <p>Emergency phone: (859) 572-7777</p>	<p>Non-emergency phone: (859) 572-5500</p> <p>Emergency phone: (859) 572-7777</p>
Dean of Students		<p>Bob Alston, vice president for Student Engagement and Dean of Students</p> <p>Phone: (859) 572-5147</p>
Sexual Harassment Resource Site	<p><a href="http://nku.edu/titleix">nku.edu/titleix</a></p>	<p><a href="http://nku.edu/titleix">nku.edu/titleix</a></p>

Facilitated Anonymous Reporting		A student can go to the Norse Violence Prevention Center or Health, Counseling and Student Wellness to submit an anonymous report. The amount of detail provided in an anonymous report will determine the university's ability to investigate or respond. Anonymous reports of Clery Act crimes made through these offices may still be subject to a CSA report under the Jeanne Clery Act.
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OFF-CAMPUS	Employees	Student
Counseling/Mental Health	Employee Assistance Program (EAP) General Assistance phone: (888) 238-6232 *Confidential Resource	NorthKey Community Care Mental Health Services (859) 781-5595
ION Center	24-Hour Crisis Line: (serves individuals of all gender identities) (800) 928-3335 or (859) 491-3335	24-Hour Crisis Line: (serves individuals of all gender identities) (800) 928-3335 or (859) 491-3335
Women Helping Women	24-Hour Crisis Line: (serves individuals of all gender identities) (513) 381-5610	24-Hour Crisis Line: (serves individuals of all gender identities) (513) 381-5610
Other Law Enforcement	Emergency 911	Emergency 911

Other resources available to persons who report being the victim of sexual assault, domestic violence, dating violence or stalking, include the Rape, Abuse and Incest National Network ([rainn.org](http://rainn.org)) and the Department of Justice ([www.justice.gov/ovw/sexual-assault](http://www.justice.gov/ovw/sexual-assault)).

## ADJUDICATION OF POSSIBLE VIOLATIONS

The university's disciplinary process includes a prompt, fair, equitable and impartial investigation and resolution process. In all instances, the process will be conducted in a manner that is consistent with the institution's policy and that is transparent to the accuser and the accused. Usually, the resolution of complaints of domestic violence, dating violence, sexual assault, stalking, and other sex-based offenses is completed within 60-90 business days of the report. However, each proceeding allows for extensions of timeframes for good cause with written notice to the



accuser and the accused of the delay and the reason for the delay. University officials involved in the investigation or adjudication of these complaints are trained annually on the issues related to domestic violence, dating violence, sexual assault, stalking and sexual harassment, as well as how to conduct an investigation and hearing process that protects the safety of the victim and promotes accountability.

**Furthermore, each policy provides that:**

1. The accuser and the accused will have timely notice for meetings at which the accuser or accused, or both, may be present.
2. The accuser, the accused and appropriate officials will have timely and equal access to any information that will be used during formal and informal disciplinary meeting and hearings.
3. The institutional disciplinary procedures will not be conducted by officials who have conflict of interest or bias for or against the accuser or the accused.
4. The accuser and the accused will have the same opportunities to have others present during any institutional disciplinary proceeding. The parties must have an Advisor present at the hearing to conduct indirect questioning of parties and witnesses. The parties may choose their own Advisor. If a party does not have an Advisor for a hearing, the University will appoint a trained Advisor for the limited purpose of conducting any questioning of the other party and witnesses during the hearing. In addition to the hearing, the Parties may be accompanied by one individual of their choosing in all meetings and interviews for support, advice, and/or consultation. More information about the role of Advisors may be found in the [Sexual Harassment Policy](#) or the [Advisor Guidance and Designation Form](#) provided by the Office of Title IX.
5. The accuser and the accused will be notified simultaneously, in writing, of any initial, interim and final decision of any disciplinary proceeding.
6. Where an appeal or grievance is permitted under the applicable policy, the accuser and the accused will be notified simultaneously in writing of the procedures for the accused and the victim to appeal the result of the

institutional disciplinary proceeding. When an appeal or grievance is filed, the accuser and the accused will be notified simultaneously in writing of the procedures. When an appeal or grievance decision is made, the accuser and the accused will be notified simultaneously in writing of the outcome.

**If the Victim Does Not Wish to Pursue Resolution**

Whether or not criminal charges are filed, a victim may pursue the university's grievance process. Where the victim of sexual harassment does not want to pursue the university's grievance process, they may make such a request to the Title IX Coordinator, who will evaluate that request in light of the duty to ensure the safety of the campus and to comply with state or federal law.

The goal is to provide the victim with as much control over the process as possible, while balancing the university's obligation to protect its community. In cases where the victim requests confidentiality/no formal action and the circumstances allow the university to honor that request, the university may still provide the victim supportive measures.

## DISCIPLINARY PROCEEDINGS UTILIZED IN CASES OF ALLEGED SEXUAL HARASSMENT, INCLUDING DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT AND STALKING

NKU's Sexual Harassment Policy prohibits all forms of sexual harassment and applies to the entire NKU community, including students, student organizations, faculty, administrators, staff, and third parties such as guests, visitors, volunteers, invitees, and campers.

When an alleged violation of the policy is reported, the allegations are subject to resolution using NKU's formal grievance process, as detailed in the policy.

### ORGANIZATIONAL BEHAVIOR

Registered student organizations are afforded the same rights and responsibilities in accordance with NKU policies. Any member of the university community may bring allegations against a student group or organization for violation of the Sexual Harassment Policy.

The Title IX Coordinator, Title IX Investigator, and/or Director of Community Standards and Care may confer with the student group/organization's advisor(s), international headquarters and/or other faculty and staff with a relationship to the student group/organization to solicit advice and recommendations regarding the case. Ultimately, the university is responsible for determining if the organization and/or individuals will be charged and the process for adjudication. All sections of this policy apply to groups and organizations.

### Statement on Privacy

The university will protect the identity of persons who report having been victims of sexual assault, domestic violence, dating violence or stalking to the fullest extent of the law. Additionally, the university will take all reasonable steps

to investigate and respond to the complaint consistent with any request for privacy or request not to pursue an investigation. However, its ability to do so may be limited based on the nature of the request by the complainant.

If the victim requests anonymity or that the university not pursue an investigation, NKU must balance this request in the context of its responsibility to provide a safe environment for all university community members. In cases where NKU cannot respect the wishes of the victim, the university will consult with the victim and keep them informed about its course of action.

If the report of misconduct discloses an immediate threat to the NKU campus community, where timely notice must be given to protect the health or safety of the community, the university will maintain the privacy of the victim or respondent's identities, understanding that in a small community an alert may make members of the community feel known or singled out.

NKU will assess any barriers to proceeding, including retaliation, and in cases where informal or formal resolution will take place, the university will inform the respondent that Title IX prohibits retaliation, and the university will take strong responsive action to protect the complainant.

NKU has designated the following individual(s) to evaluate requests for privacy once the University is aware of alleged sexual violence:

- Darryl Peal, Chief Diversity, Equity, and Inclusion Officer/Title IX Coordinator;
- Bob Alston, Assistant Dean of Students Community Care & Student Conduct; or
- A trained designee

### Investigation of Reports

NKU will take prompt action to investigate and adjudicate the complaint. However, if the victim wishes to participate in a police investigation, the university may wait a reasonable amount of time (usually 7-10 business days) to allow the police to conduct initial fact finding and the gathering of evidence in the criminal investigation. NKU's police chief or designee may regularly confer on the status of an active investigation to ensure compliance with federal

requirements while maintaining the integrity of any active criminal process.

Investigations are completed expeditiously, normally within thirty to forty-five (30-45) business days, though some investigations may take weeks or even months, depending on the nature, extent, and complexity of the allegations, availability of witnesses, police involvement, etc.

The University will make a good faith effort to complete investigations as promptly as circumstances permit and will communicate regularly with the Parties to update them on the progress and timing of the investigation.

Investigations will be conducted by one or more of the following: University Police, an external investigator, or an investigator within the Office of Title IX. All reasonable efforts will be made to keep information private during NKU's investigation and adjudication of a complaint.

The investigation is designed to provide a fair and reliable gathering of the facts. The investigation will be thorough, impartial and fair. University Police and other staff members who are responsible for these investigations have been trained in investigation, Title IX, LGBTQ concerns and trauma-informed training and are aware of this policy.

As described in the confidentiality section of this policy, the investigation will be conducted in a manner that is respectful of individual privacy concerns.

Investigations involve interviews with all relevant parties and witnesses; obtaining available, relevant evidence; and identifying sources of expert information, as necessary. The investigator will provide regular status updates to the parties throughout the investigation. Prior to the conclusion of the investigation, the investigator will provide the parties and their respective Advisors (if so desired by the Parties) a copy of the draft investigation report as well as an opportunity to inspect and review all of the evidence obtained as part of the investigation. The investigator will incorporate relevant elements of any written responses by the parties and finalize a final investigation report prior to the hearing.

### **Supportive Measures**

The University will offer and implement appropriate and reasonable supportive measures to the parties upon notice of alleged sexual harassment. Supportive measures are available to all parties without expense, even if no formal complaint has been filed.

Supportive measures are non-disciplinary, non-punitive individualized services offered when appropriate, as reasonably available, and without fee or charge to the parties to restore or preserve access to the university's education programs or activities.

The University will maintain the privacy of the supportive measures, provided that privacy does not impair the University's ability to provide the supportive measures. The University will act to ensure as minimal an academic impact on the Parties as possible. The University will implement measures in a way that does not unreasonably burden the other Party.

These actions may include, but are not limited to:

- Referral to counseling, medical, and/or other healthcare services
- Referral to community-based service providers
- Education to the community or community subgroup(s)
- Altering campus housing assignment(s)
- Altering work arrangements for employees or student-employees
- Providing campus safety escorts
- Implementing contact limitations (university no contact orders) between the Parties. Violations of no contact orders will be referred to appropriate student or employee conduct processes for enforcement.
- Recommendations for academic support, extensions of deadlines, or other course/program-related adjustments
- Class schedule modifications, withdrawals, or leaves of absence
- Campus trespass orders and/or Timely Warnings

- Increased security and monitoring of certain areas of the campus
- Any other actions deemed appropriate by the Title IX Coordinator

## HEARING PROCEDURES

Pursuant to the 2020 Title IX Regulations (34 CFR Part 106), the procedures used to resolve allegations of sexual harassment in an education program or activity of the university, against a person in the United States, will involve a live hearing. The university will designate a single Decision-maker to conduct the hearing.

No less than ten (10) business days prior to the hearing, the Title IX Coordinator or the Decision-maker will send notice of the hearing to the parties. During the hearing, parties and witnesses may provide relevant information and will submit to questioning by the parties through their Advisors (“cross-examination”) and then by the Decision-maker if so needed. The Decision-maker will limit or disallow questions on the basis that they are irrelevant, unduly repetitious (and thus irrelevant), or abusive.

If a party or witness chooses not to submit to cross-examination at the hearing, either because they do not attend the meeting, or they attend but refuse to participate in questioning, then the Decision-maker may not rely on any prior statement made by that party or witness at the hearing (including those contained in the investigation report) in the ultimate determination of responsibility.

The Decision-maker will deliberate in closed session to determine whether the Respondent is responsible or not responsible for the policy violation(s) in question. The preponderance of the evidence standard of proof is used. The Decision-maker will prepare a written deliberation statement and deliver it to the Title IX Coordinator, detailing the determination of responsibility, rationale, the evidence used in support of its determination, the evidence disregarded, and credibility assessments.

When there is a Finding of responsibility on one or more of the allegations, the Title IX Coordinator will provide the written deliberation statement to a Sanctioning Panel. The composition of the Sanctioning Panel will be determined by the classification of the Respondent. The Sanctioning Panel for an enrolled student will consist of one faculty member,

one staff member, and one student, in accordance with Kentucky law (KRS 164.370). The Sanctioning Panel for university employees shall be convened as governed by existing disciplinary policies.

The Sanctioning Panel will consider the written deliberation statement, previously submitted Party impact statements, and any pertinent discipline history to determine the appropriate sanctions in consultation with other appropriate administrators, as necessary.

The Panel’s sanctioning decision will be made in writing, will include the rationale for the sanction(s), and be delivered to the Title IX Coordinator. Based upon the Decision-maker’s deliberation statement, and the Sanctioning Panel’s sanctioning decision if the Respondent was found responsible, a final determination will be sent to the parties simultaneously, in writing.

The final determination will include the finding on each alleged policy violation, any sanctions issued, and information detailing appeal rights and notice regarding when the determination is considered to be final.

## APPEALS

**Any party may file a request for appeal. A single Appeal Decision-maker will hear the appeal.**

**Appeals are limited to the following grounds:**

- Procedural irregularity that affected the outcome of the matter;
- New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made, that could affect the outcome of the matter; and
- The Title IX Coordinator, Investigator, Decision-maker, or Sanctioning Panel member had a conflict of interest or bias for or against Complainants or Respondents generally or the specific Complainant or Respondent that affected the outcome of the matter.

If the request for appeal does not meet any of the grounds for appeal above, that request will be denied by the Appeal

Decision-maker. The parties and their Advisors will be notified in writing of the denial and the rationale.

If the Request for Appeal meets any of the grounds for appeal above, then the Appeal Decision-maker will notify the parties and their Advisors, the Title IX Coordinator, and, when appropriate, the investigators and/or the original Decision-maker.

The other party and their Advisor, the Title IX Coordinator, and, when appropriate, the Investigators and/or the original Decision-maker will be provided with the Request for Appeal with the approved grounds. Those responding are given ten (10) business days to submit a response to the portion of the appeal that was approved and involves them. All responses will be forwarded by the Appeal Decision-maker to all parties for review and comment.

The non-appealing party (if any) may also choose to raise a new ground for appeal at this time. If so, that will be reviewed to determine if it meets the grounds in the Sexual Harassment Policy by the Appeal Decision-maker and either denied or approved. If approved, it will be forwarded to the party who initially requested an appeal, the investigator and/or original Decision-maker, as necessary, who will submit their responses in ten (10) business days, which will be circulated for review and comment by all parties.

Neither party may submit any new requests for appeal after this time period. The Appeal Decision-maker will collect any additional information needed and all documentation regarding the approved grounds and the subsequent responses and the Decision-maker will render a decision, based on the the preponderance of the evidence standard. A Notice of Appeal Outcome will be sent to all parties simultaneously including the decision on each approved ground and rationale for each decision.

The decision of the Appeal Decision-maker is final unless further appeal is required by law or university policy.

- Respondent students who are suspended or expelled may appeal to the Board of Regents on the grounds listed above. The decision of the Board of Regents is final and the sanction(s) imposed will stand.

- Employed Parties may file subsequent appeals as outlined in the Staff Grievance Policy, Faculty Handbook or other university policy.

## APPEAL PROCESS

### **Appeal procedures for sanctions other than suspension or expulsion:**

An Appeal Panel will be appointed by the senior associate Dean of Students and shall consist of three members of the University: one faculty member, one staff member and one student member. No member of the Conduct Board may sit on the Appeal Panel for the same matter. The Senior Associate Dean of Students will provide training to the panel. An Appeal Panel will be convened within five working days following notification of appeal from the senior associate Dean of Students.

The Panel shall review the record and recommend to the senior associate Dean of Students to approve, reject or modify an earlier decision or the sanctions recommended or imposed. A majority vote is required. The Appeal Panel will notify the senior associate Dean of Students of their recommendation in writing within five working days. So advised, the senior associate Dean of Students will make a final decision in writing to the student/student organization in writing within five working days. The senior associate Dean may reconvene the Conduct Board to hear new or different evidence. The decision of the senior associate Dean after a review of the Appeal Panel's recommendation shall be final, and there are no further appeals.

Complainants and/or the Accused shall use this procedure to appeal the decision of a sexual misconduct allegation unless a sanction of suspension or expulsion is imposed. This includes an appeal of a finding of not responsible.

Within University Housing, cases heard by a residence hall director in which eviction was not involved as a sanction can be appealed to the associate director of University Housing. Cases heard by the associate director of University Housing, or her/his designee, in which eviction was involved as a sanction can be appealed to the Office of Student Conduct, Rights and Advocacy. In both cases, findings will be provided to the student in writing within five (5) working days.

**Appeal procedures for sanctions of suspension or expulsion:**

**a. First Appeal—Vice President and Dean of Students for Student Affairs**

The written statement of appeal will be forwarded by the senior associate Dean of Students to the Office of the Vice President and Dean of Students for Student Affairs. The Vice President and Dean of Students has the sole discretion to decide whether to review the appeal or send it to an Appeal Panel for review. Should the vice president and Dean of Students review the case, he/she will review the record and determine whether to approve, reject or modify an earlier decision or the sanctions recommended or imposed. The decision of the vice president and Dean of Students will be made in writing within five working days of receipt of the appeal unless extenuating circumstances apply. Should the vice president and Dean of Students for Student Affairs decide to send the case to an Appeal Panel, the following procedures will apply:

**i. Appeal Panel**

The Appeal Panel shall consist of three members of the University: one faculty member, one staff member and one student member. Panel members shall be appointed by the vice president and Dean of Students for Student Affairs. The senior associate Dean of Students will provide training to the panel. An Appeal Panel will normally be convened within five working days following notification from the vice president and Dean of Students for Student Affairs. The Panel shall review the record and recommend to the vice president and Dean of Students whether to approve, reject or modify an earlier decision or the sanctions recommended or imposed. A majority vote is required. The Appeal Panel will notify the vice president and Dean of Students of their recommendation in writing within five working days. So advised, the vice president and Dean of Students will notify the student/student organization and senior associate Dean of Students of the decision in writing within five working days. The senior associate Dean of Students shall implement the decision of the vice president and Dean of Students for Student Affairs

**b. Final Appeal—Board of Regents**

If the student/student organization disagrees with the decision of the vice president and Dean of Students for

Student Affairs, he/she may appeal to the Board of Regents by submitting a written statement of appeal to the Dean of Students office within five working days after the date of the vice president and dean’s decision. The Board will review the record and determine whether to approve, reject or modify an earlier decision or the sanctions recommended or imposed. The decision of the Board of Regents will be final, and the sanction(s) imposed will stand. The Board will inform the senior associate Dean of Students of their decision in writing and provide these findings and sanctions to the student/student organization in writing within five working days following the Board of Regents Meeting. The senior associate Dean of Students shall implement the decision of the Board.

**FACULTY, STAFF, AND ADMINISTRATION INVESTIGATION PROCESS UTILIZED IN CASES OF ALLEGED DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT AND STALKING**

**GENERAL STANDARDS OF CONDUCT**

NKU is committed to operating with integrity and in compliance with all applicable federal, state and local laws, regulations and policies. Additionally, all faculty, staff and administrators are expected to conduct themselves honestly and with a high degree of personal integrity. The mutual respect and collegiality that is gained as a result of adherence to these high standards encourages a positive and productive work environment. This not only involves sincere respect for the rights of others but also requires that faculty, staff and administrators refrain from behavior, in both their professional and personal lives, that might be harmful to themselves or their coworkers and/or the university. To maintain the integrity of NKU and to protect the rights of its students, faculty, staff, administration and the university itself, employees are expected to conduct



themselves honestly, professionally and ethically at all times.

Additionally, to make NKU a safe and pleasant place to work, every employee is expected to observe certain standards of conduct. Certain conduct is of such serious nature that immediate dismissal may be warranted without prior warning or discipline. Examples of such conduct are as follows: gross insubordination; dishonesty; stealing property or merchandise belonging to the university, its suppliers, students or other employees; private financial relations with customers or suppliers; deliberate damage to university property; fighting; falsifying or causing to be falsified on an employment application, time card or other university documents; unlawful possession, use or distribution of alcohol; intoxication; the illegal use, sale, manufacture, possession or distribution of drugs or narcotics; sexual misconduct, other inappropriate sexual conduct, illegal harassment and/or discrimination; the possession or use of firearms or other weapons on university premises, including in employees' own vehicles; or the use or threat of violence. The specific conduct described in this section does not include all of the possible grounds for discipline or discharge.

These descriptions are intended as illustrations of the types of conduct that must be avoided for the good of our employees, students, visitors and the university itself. Because these rules are essential to our most important function—high quality service to our students—as well as to the efficient operation of our business, the provisions of this section will be promptly and fairly enforced. We appreciate the cooperation of every employee in the careful observance of these standards of conduct.

### **Faculty, staff, administration and Student Sexual Harassment, Sexual Misconduct, Dating Violence, Domestic Violence, Stalking, and Sexually Inappropriate Behavior**

All NKU members have the right to work and study in an environment free of discrimination, including freedom from sexual harassment, sexual misconduct, dating violence, domestic violence, stalking and other sexually inappropriate behavior. The intent of this policy is to foster responsible behavior in a working and academic environment free from

discrimination and harassment. Thus, NKU strongly disapproves of and forbids the sexual harassment of students, faculty, staff and administration, and will not tolerate sexual assault, sexual misconduct, dating violence, domestic violence, stalking and other sexually inappropriate behavior.

Sexual harassment, sexual misconduct, dating violence, domestic violence, stalking and other sexually inappropriate behavior as defined by this policy is prohibited when it involves any member of the campus community:

- Toward a faculty member or employee by a faculty member or employee
- Toward a student by a faculty member or employee
- Toward a faculty member or employee by a student
- Toward a student by a student
- Toward a member of the faculty, staff or administration by a visitor or guest of the university
- Toward a student by a visitor or guest of the university

All members of the faculty, staff and administration (with the exception of Health, Counseling, and Student Wellness staff) are required to report incidents of prohibited conduct, harassment and/or discrimination—including sexual harassment and gender discrimination, sexual misconduct, relationship violence and sexually inappropriate behavior—that they observe, are informed about or of which they become aware by any means to the Office of Title IX.

Discrimination occurs when race, color, national or ethnic origin, sex, sexual orientation, gender identity or expression, marital status, disability, religion, veteran status, age or any protected status is used as (inappropriate) irrelevant criteria for action. Discrimination is particularly condemned when it exploits and jeopardizes the trust that should exist among members of an educational institution. To preserve a work and study atmosphere that fosters such trust, NKU affirms the principle that students, faculty and staff must be treated equitably and evaluated on the basis of merit rather than irrelevant criteria. When a person intentionally or inadvertently abuses the power and authority inherent in their position, there can be negative

consequences both to the individuals involved, as well as to the educational and working environment of the university.

Discrimination also includes harassment. Harassment may be based on a person's race, color, national or ethnic origin, sex, sexual orientation, gender identity or expression, marital status, disability, religion, veteran status, age or any protected status. It includes a wide range of abusive and humiliating verbal or physical behaviors that are directed against a particular person or persons. In some cases, the conduct may be such that it is clear that it is directed against a particular person or persons, even though the person(s) may not be explicitly identified.

Examples of unacceptable behavior include but are not limited to the following:

- Physical, emotional or mental abuse
- Racial, religious, ethnic or gender—based or sexual insults
- Derogatory ethnic, religious or sexual jokes or slurs
- Unwelcome sexual comments or advances
- Taunting intended to provoke an employee
- Requests for sexual favors used as a condition of employment or affecting any personnel decisions such as hiring, promotion or compensation
- Unwanted physical contact such as pinching, grabbing, rubbing, etc.; stalking, bullying, cyberbullying, etc.

All members of the faculty, administration and support staff who have information regarding, are witness to or become aware of by any means any form of harassment or discrimination are required to report the incident.

## **REPORTING OF PROHIBITED CONDUCT, HARASSMENT AND DISCRIMINATION VIOLATIONS**

Any faculty, staff or administrator who believes they have been a victim of any form of prohibited conduct, harassment or discrimination in any form should bring the matter to the Office of Human Resources.

All faculty, staff and administration members are required to report incidents of prohibited conduct, harassment and/or discrimination, including sexual harassment and gender discrimination, sexual misconduct, relationship violence and sexually inappropriate behavior, that they observe, that they are informed about or of which they become aware by any means to Office of Title IX.

### **Review Process**

When the individual making a claim or is the respondent to a claim and is a faculty, staff or administrator, the investigation will normally be assigned and investigated by the Title IX Investigator or Human Resources. The investigation at a minimum include meeting with the individual making the claim, the individual who is the respondent and any witnesses or those who may have relevant information. Any action taken regarding a faculty member will be determined based on procedures set forth in the faculty handbook. Any action taken regarding a staff or administrator will be based on university policy and procedures. NKU, in its sole discretions, makes corrective action decisions.

Faculty or staff complaints about a student will be reviewed by the Office of Title IX. The judicial procedures for sexual harassment grievances are outlined in the Student Code of Conduct.

Student complaints about other students will be reviewed and investigated per the Sexual Misconduct Policy by the Office of Title IX. The judicial procedures for sexual harassment grievances are outlined in the Student Code of Conduct.

During the course of an investigation, the individual conducting the investigation may consult with or notify the university president, the provost, the vice president of Student Affairs, the designee of Human Resources, the chief of police and/or another administrator or outside legal counsel as appropriate.

Confidentiality will be maintained throughout the investigation to the extent practicable and consistent with NKU's need to undertake a full and impartial investigation. Only those with a need-to-know business will be involved in the investigation.

In cases involving an issue or concern outlined on page 54, both the complainant and/or the respondent may have an advisor of their choice present during the investigation.

The role of an advisor is to support the claimant/respondent, but the advisor may not represent the claimant/respondent during the investigation. The claimant/respondent may speak quietly with their advisor or request a short break in order to speak.

Faculty, staff and administrators questioned by the university during the course of an investigation are expected to provide their full cooperation. In turn, it is the expectation of NKU that all those involved in an investigation, including the individual making the claim, the individual who has been accused and any witnesses will be treated with dignity and respect during the course of the investigation. If criminal conduct has been alleged, the claimant may elect to file a complaint with the appropriate authorities. The university will conduct its own investigation, even if a criminal investigation occurs.

NKU will normally conclude its investigation in a period of 60 days or less. In rare cases where the matter presents particular complexities or the unavailability of witnesses, the time period may be extended. All investigations will offer an equal opportunity for the claimant and the respondent to present relevant witnesses and other evidence. At the conclusion of the investigation, the university will determine whether a violation of this policy occurred using a "preponderance of the evidence" standard. This means that, based on the totality of the evidence, harassment more likely than not occurred (not a "clear and convincing evidence" standard).

The individual making the complaint, as well as the respondent, will be apprised of the outcome of the investigation in writing. The University Grievance Procedure is available to staff and administrators after a determination has been made by the university as discussed above (as long as it meets one of the three grounds identified in the policy).

If harassment or other violation is found to have occurred, immediate and appropriate action will be taken to stop the harassment or other violation, eliminate the hostile environment, prevent its recurrence and remedy its effects.

Where a respondent has been found responsible, NKU will take appropriate actions, which may include disciplinary and corrective actions designed to prevent future occurrences. Sanctions may be issued individually, or a combination of sanctions may be imposed. The determination of sanctions is based upon a number of factors including: the nature, severity of and circumstances surrounding the violation; the harm suffered by the complainant; any ongoing risk to either the complainant or the community posed by the respondent; the impact of the violation on the community, its members or its property; any previous disciplinary history; previous complaints or allegations involving similar conduct; and any mitigating or aggravating circumstances.

Corrective action measures may consist of actions including: verbal warning, written warning, final written warning, suspension without pay or possible termination of employment. Employees found responsible for incidents of sexual violence or assault will receive a more significant corrective action, up to and including termination. The determination of corrective action is made by a designee of Human Resources. Faculty sanctions will be handled per procedures outlined in the Faculty Handbook.

In appropriate cases, NKU may determine the misconduct was motivated by bias, insofar as a complainant was selected on the basis of their race, color, ethnicity, national origin, religion, sex, sexual orientation, gender expression, gender identity, age, veteran's status, marital/family status, genetic information or disability.

Where the university determines that the misconduct was motivated by bias, it may elect to increase the sanction imposed as a result of this motivation. Disciplinary sanctions may range from probation to permanent separation from NKU. They may also include any educational, remedial or corrective actions as warranted. Sexual assault allegations cannot be resolved through any voluntary or informal process.

#### **Notice of Outcome and Sanction**

The university will communicate the outcome and any sanction(s) to the complainant and respondent. Generally, the outcome of the formal process will be final and communicated

to the parties within five business days from the date of the final determination and will be provided in writing.

### **Grievance Procedure**

The University Grievance Procedure exists as a means to contest a determination that has been made regarding an alleged violation of the university's Harassment and Discrimination-Free Workplace Policy, including any Title IX-related claims. This procedure is available to employees after a determination has been made by a university administrator.

### **What Categories are Not Covered by the University Grievance Appeal Procedure?**

The University Grievance Appeal Procedure does not apply to issues concerning compensation, classification, work standards, other university policies, matters that are beyond the control of jurisdiction of the university or any disciplinary matter or termination unless the employee believes that such actions were the result of unlawful discrimination or harassment.

Additionally, dismissal of a faculty member for cause, non-reappointment of a non-tenured faculty member or tenure/promotion issues may not be addressed with the University Grievance Appeal Procedure. These faculty issues, which may be addressed using procedures found in the Faculty Handbook, are under the purview of the peer review committee, a faculty committee that is distinct from the other grievance processes.

## **NOTIFICATION TO VICTIMS OF CRIMES OF VIOLENCE**

NKU will, upon written request, disclose to the alleged victim of a crime of violence or a non-forcible sex offense the report on the results of any disciplinary proceeding conducted by the university against a student or employee who is the alleged perpetrator of that crime or offense. If the alleged victim is deceased as the result of such crime or offense, the next kin of such victim shall be treated as the alleged victim for the purposes of this paragraph.

## **ALCOHOL/DRUG POLICIES AND PROCEEDINGS**

In accordance with the federal Drug-Free Workplace Act of 1988, the federal Drug-Free Schools and Communities Act (DFSCA) of 1989, and state policies on alcohol and other drugs, NKU prohibits the unlawful or unauthorized possession, use, sale, manufacture, distribution or dispensation of alcohol and other drugs by employees and students in the workplace, on university property or as part of any campus activity. Employee or student violators are subject to disciplinary action, up to and including termination of employment and expulsion.

In order to ensure the university's commitment to a quality educational and work environment, every student, faculty and staff member of the NKU community has a right to work and learn in an environment free from the effects of alcohol and other drug abuse.

It is the policy of the university to discourage the misuse and abuse of alcohol and other drugs. NKU prohibits the unlawful possession, use or distribution of drugs and alcohol on its property or as a part of its activities. Alcoholic beverages are permitted in university facilities for private events with permission of various departments, provided such does not violate any law or university regulation.

The Drug Free Schools and Communities Act requires every institution of higher education to inform students of standards of conduct that clearly prohibit violations of local, state and federal laws pertaining to alcohol and other drugs. Standards of conduct for NKU students, including those that prohibit certain behavior related to substance use/abuse, are found in the NKU Code of Student Rights and Responsibilities ([nku.edu/scra](http://nku.edu/scra)). For more information about these policies, please contact the Office of Student Conduct, Rights, and Advocacy by visiting Student Union 301 or by calling (859) 572-5147.

In response to the serious problems of alcohol and other drug abuse in our society, NKU offers a variety of educational and assistance programs to the student population. For more information about these programs, students should contact the Office of Health, Counseling, and Student Wellness by visiting University Center 440 or by calling (859) 572-5650.



University Police reports violations of law to the appropriate university department and works in collaboration with the state and local police, who are responsible for enforcing the laws of the Commonwealth of Kentucky, including laws relative to the possession, use and sale of alcoholic beverages. This includes the enforcement of state underage drinking laws and federal and state drug laws. Student violations of the policies and guidelines pertaining to alcohol and drugs specified in the NKU's Code of Student Rights and Responsibilities Handbook will result in sanctions appropriate to the degree of the violation. Sanctions will increase in severity for repeated violations. Student sanctions will include but are not limited to: points, fines, education, referrals for counseling, community service, probations, residence hall separation or suspension or expulsion from the university.

Students and employees are expected to be acquainted with and abide by state laws and university regulations regarding alcohol and drugs and to be aware of the social, physiological and psychological consequences

of excessive drinking in order to make responsible and informed decisions about the serving and consumption of alcohol. NKU's Alcoholic Beverage Policy is designed to be consistent with the laws of the Commonwealth of Kentucky, which, in general, prohibits the possession, consumption, transporting and serving of alcoholic beverages by and to persons less than 21 years of age. The university enforces all local and state laws regarding the possession, use and sale of alcoholic beverages, including those prohibiting the consumption of alcoholic beverages by persons under the age of 21 on campus and at university-sponsored activities. NKU provides regular education programs on alcohol and drug abuse as well as counseling services.

Appearing in a public place on university premises or at university-sponsored activities under the influence of a controlled or other intoxicating substance to the degree that there is danger to self, others or property, or unreasonable annoyance to others can result in the individual being criminally charged and are subject to university disciplinary proceedings.

The full text of the NKU's Alcohol Beverage Policy is available online ([nku.edu/scra](http://nku.edu/scra)).



UPD Pledge Event – Reminding students the UPD officers pledge to treat them with dignity and respect.

There are also serious legal repercussions for driving under the influence of alcohol. Drivers under the age of 21 with a BAC of .02 or higher will be charged with Driving Under the Influence (DUI). Drivers 21 and over with a BAC of .08 or higher will be charged with DUI. Locally, there are local open container and noise ordinances.

### **Narcotics on Campus**

The use of narcotics and controlled substances without a prescription on university premises, as elsewhere, is illegal. Illegal possession, use and/or sale of drugs or narcotics by students, employees or guests constitute unacceptable and illegal conduct. University Police reports violations of law to the appropriate university department and works in collaboration with state and federal law enforcement and local police. When students are awarded PELL or other federally funded grants, they agree to abide by the conditions of the drug-free workplace certifications. It is their responsibility to inform the Office of Student Financial Assistance within five days of any criminal illegal drug statute conviction.

The Office of Student Conduct, Rights, and Advocacy will contact Health, Counseling and Student Wellness to provide the AOD counselor with referred students' names for reporting student compliance. The referring office will provide the student with information explaining the referral process, fees, class times, deadlines and contact information. The student will be notified by letter as to the session he/she is to attend.

Anyone who has questions about the referral process should contact the Office of Student Conduct, Rights & Advocacy at (859) 572-5147 or by visiting the office in Student Union 301.

The Code of Student Rights and Responsibilities also specifies the prohibitions and penalties for violations of these prohibitions and is part of the Code of Student Rights and Responsibilities Handbook, which is published under separate cover and is available through the Office of Student Conduct, Rights and Advocacy ([nku.edu/scra](http://nku.edu/scra)).

The Personal Responsibility Education Program (PREP) at NKU is a mandatory, one-time intervention program designed to educate students about facts, effects and risks of abusing alcohol and/or other drugs. The program was

established to assist students who have been referred by University Housing, the dean of students officer or Athletics for first-time infractions related to substance abuse on campus and for violating the university's alcohol and drug policy. More information about PREP can be located online ([nku.edu/hcsw/prep](http://nku.edu/hcsw/prep)). Additional alcohol and drug policies, standards of conduct, applicable disciplinary sanctions, health risks, counseling and treatment, processes, goals and objectives can be found on this website and within the Health, Counseling and Student Wellness. The biennial report, developed in accordance with the Drug Free Schools and Communities Act (DFSCA) of 1989 can be obtained from the Office of Student Conduct, Rights and Advocacy, located in the Student Union 301 or by calling (859) 572-5147.

### **ALCOHOL AND OTHER DRUGS (AOD) EDUCATION AND OUTREACH**

NKU recognizes that alcohol and other drug abuse is a serious problem in our society and offers a variety of educational and assistance programs to the student population:

- An annual alcohol and drug abuse awareness week
- Alcohol/drug education and assistance program for athletes.
- Annual residence hall programs on drug and alcohol abuse
- Annual alcohol and drug training sessions for residence hall assistants

Student Wellness provides materials and/or presentations related to all various aspects of wellness including substance abuse prevention, managing stress, alcohol 101 and other related topics. Information, literature and presentations on substance abuse are available in the Health, Counseling and Student Wellness Office, located in University Center 440. To receive more information, contact the department at (859) 572-5650 or via e-mail at [hcsw@nku.edu](mailto:hcsw@nku.edu).

All university employees, faculty members, their dependents and household members are eligible to use the services provided by NKU's Employee Assistance Program ([nku.edu/hcsw/eap](http://nku.edu/hcsw/eap)).

## ANNUAL FIRE SAFETY REPORT AND INFORMATION

Each year, the Northern Kentucky University Police Department completes an Annual Fire Safety Report (ASR) that includes yearly fire statistics, a description of fire safety systems, yearly fire drills, policies on portable electrical appliances, smoking and open flames, evacuation procedures, policies on fire safety education and training, and contact information.

The university shall complete the ASR and include in the university's annual report pursuant to the Clery Act. To view or obtain a copy of the ASR, visit the University Police website ([nku.edu/police](http://nku.edu/police)). There are also safety guides, fire prevention, fire safety and education programs, and fire safety policies online.

### DESCRIPTION OF EACH STUDENT HOUSING FACILITY FIRE SAFETY SYSTEMS

The existence or nonexistence of automatic fire suppression systems in on-campus housing facilities: sprinkler systems, smoke detectors and fire alarms are provided in the residence halls as specified by fire safety codes. Currently, the existence of automatic fire suppression systems in on-campus housing facilities is disclosed through a brochure created by the Office of Safety and Emergency Management and Compliance and is distributed by University Housing staff to all residents.

Fire Safety Systems in NKU Residential Facilities							
Facility	Fire Alarm Monitoring Done on Site (by University Police)	Partial *1 Sprinkler System	Full *2 Sprinkler System	Smoke Detection	Fire Extinguisher Devices	Evacuation Plans & Placard	Number of evacuation (fire) drills each year
Callahan Hall 3510 Alexandria Pike	X		X	X	12	X	4
Commonwealth Hall 20 Campbell Drive	X		X	X	2	X	4
Kentucky Hall 20 Campbell Drive	X		X	X	14	X	4
Norse Hall 10 Campbell Drive	X		X	X	2		4
Northern Terrace 3520 Alexandria Pike	X		X	X	38		4
University Suites 30 Campbell Drive	X		X	X	22	X	4
New Residence Hall 5133 Carroll Drive	X		X	X	20		4

\*1. Partial Sprinkler Systems is defined as having sprinklers in the common areas only

\*2. Full Sprinkler System is defined as having sprinklers in both the common areas and individual rooms.

Note: Apartment style dorms having a direct exit to the outside are not required to have emergency evacuation plans.

**Norse Hall**

Norse Hall is an apartment-style housing facility in which each apartment has access directly to the outside of the building. Each apartment is equipped with a single station smoke detector. Norse Hall is equipped with an automatic fire alarm system with pull stations at each level and automatic flow switched on the sprinkler system. Horns/strobes have been placed in each apartment. The building is fully sprinkled with automatic flow switches attached to the fire alarm.

**New Residence Hall**

The New Residence Hall is a semi-suite facility, primarily with two bedrooms per suite. Each suite bedroom and common area is equipped with a smoke detector. The building is equipped with an automatic fire alarm system with system smoke detectors in hallways, common rooms, and equipment rooms. System pull stations are located at each exit on every floor. Speaker/strobes are located in the common hallways and in study and meeting rooms. The building is fully sprinkled with automatic flow switches attached to the fire alarm system.

**Kentucky Hall**

Kentucky Hall is a traditional-style housing facility. Each unit is equipped with a single station smoke detector. The building is equipped with an automatic fire alarm system with system smoke detectors throughout the hallways, common areas and equipment rooms. System pull stations are located at each exit on every floor. Horn/strobes are located in the common hallways. The building is fully sprinkled with automatic flow switches attached to the fire alarm.

**Commonwealth Hall**

Commonwealth Hall is a traditional-style housing facility. Each unit is equipped with a single station smoke detector. The building is equipped with an automatic fire alarm system with system smoke detectors throughout the hallways, common areas and equipment rooms. System pull stations are located at each exit on every floor. Horn/strobes are located in the common hallways. The building is fully sprinkled with automatic flow switches attached to the fire alarm.

**University Suites**

University Suites is equipped with an automatic fire alarm system consisting of system smoke detectors in each unit with pull stations at each exit. Speaker and speaker/strobes are located in each unit and in the common hallways. The building is fully sprinkled with automatic flow switches attached to the fire alarm.

**Callahan Hall**

Each unit is equipped with a single station smoke detector. The building is equipped with an automatic fire alarm system with system smoke detectors throughout the hallways, common areas and equipment rooms. System pull stations are located at each exit on every floor. Horn/strobes are located in each unit and the common hallways. The building is fully sprinkled with automatic flow switches attached to the fire alarm.

**Northern Terrace**

Each unit is equipped with two single station smoke detectors. This building is equipped with an automatic fire alarm system with smoke detectors in elevators lobbies and mechanical rooms. System pulls stations are located at each exit. Horn/strobes are located in each unit and in the common open-air breezeways. The building is fully sprinkled with automatic flow switches attached to the fire alarm.

NOTE: The campus fire alarm system is a certified proprietary system monitored by University Police.



# ANNUAL FIRE SAFETY REPORT/FIRE STATISTICS (ON-CAMPUS)

## CALENDAR YEAR 2022

Fires: On-Campus Student Housing Facilities				
Facility	Street Address	Number of Fires		
		2020	2021	2022
Callahan Hall	3510 Alexandria Pike	0	0	0
Commonwealth Hall	20 Campbell Drive	0	0	0
Kentucky Hall	20 Campbell Drive	0	0	0
Norse Hall	10 Campbell Drive	0	1	0
University Suites	30 Campbell Drive	0	0	0
New Residence Hall	5133 Carroll Drive	0	0	1
Northern Terrace Apartments	3520 Alexandria Pike	0	0	0
<b>Total</b>		0	1	1

Fires—Summary									
Name of Facility	Summary of Fires								
	2020			2021			2022		
	Fires	Injuries	Deaths	Fires	Injuries	Death	Fires	Injuries	Death
Callahan Hall	0	0	0	0	0	0	0	0	0
Commonwealth Hall	0	0	0	0	0	0	0	0	0
Kentucky Hall	0	0	0	0	0	0	0	0	0
Norse Hall	0	0	0	1	0	0	0	0	0
University Suites	0	0	0	0	0	0	0	0	0
New Residence Hall	0	0	0	0	0	0	1	0	0
Northern Terrace	0	0	0	0	0	0	0	0	0
Total	0	0	0	1	0	0	1	0	0

### Disability Accommodation

Students with disabilities are given priority for housing that meets their specific accommodations to any student who informs the institution of a disability or a sensory, cognitive, or neurological deficit or impairment, or a learning disorder, minimal brain dysfunction, dyslexia, pervasive developmental disorder, autism or Asperger’s syndrome. If the housing accommodation is unavailable, the university allows the student to seek alternative on-campus or off-campus housing.

University Housing maintains a record of all on-campus housing assignment for student with disabilities. These records are shared with University Police at the beginning of each semester.

## SECURITY KEY CONTROL OF AND ACCESS TO CAMPUS FACILITIES

### Academic and Administrative Buildings

NKU's campus is open to the public. The majority of academic and administrative buildings are open to the public during normal business hours—typically 8:15 a.m.-4:30 p.m., except holidays—and are typically secured through an automated access control system. Some buildings or labs are open for longer periods to accommodate evening classes, research, community usage or other special program needs. The Steely Library hours can fluctuate, but the library is normally accessible 7 a.m.-1 a.m., Monday through Thursday of each week and other similar hours for Friday through Sunday, except holidays, break periods and summer session.

Access to some of these buildings is also controlled by card access after normal business hours, and each of these buildings have varied levels of access. Individuals who wish to access these buildings during non-business hours or special events should contact the appropriate department head. Individuals can also request doors to be opened by using the Door Opening Request System ([doorrequest.nku.edu](http://doorrequest.nku.edu)).

Academic and administrative buildings do not have a specific University Police officer assigned to them. However, University Police officers patrol the interior and exteriors of all academic and administrative buildings on a regular basis. For information about the access protocol for a specific building, see the building manager, a department head or contact University Police at (859) 572-5500.

### University Housing

Access to residential communities is restricted to NKU housing residents, authorized staff, their approved guests and other approved members of the university community. The halls are secured by key and lock systems 24 hours a day, seven days a week. Residents gain entry by use of a key or by swiping their student ID cards in the card access readers. All others gain entry by request using an intercom system. University Housing and Operations & Maintenance employees perform preventative maintenance throughout the residences, as well as responding to reported issues. Members of University Police regularly patrol the interiors and exteriors of all campus residential communities. Residence Life professional and student staff also enforce campus policies and security measures within the

residential communities to achieve a community respectful of individual and group rights and responsibilities.

Students are encouraged to keep their room and apartment doors locked at all times. They are expected to ensure that doors latch behind them when they enter or leave a building and not to prop doors open. Residents should notify University Police immediately of any suspicious activity.

Residents are cautioned against permitting strangers to enter the buildings and are strongly discouraged from holding doors open for strangers. University Police officers patrol the residential communities on a regular basis.

Resident Assistants also enforce security measures in the halls and work with residents to achieve a community respectful of individual and group rights and responsibilities. University Housing staff and University Police also conduct periodic educational sessions on prevention of various crimes, including sexual assault and acquaintance rape.

### Housing and Academic Year Breaks

University Housing remains open to residents during all academic year breaks, including fall break, Thanksgiving break, winter break and spring break. Students who choose to remain in their room during winter break, specifically, are encouraged to notify their Residence Hall director for safety and security purposes. University Housing provides limited services during academic year breaks.

## MAINTENANCE OF CAMPUS FACILITIES

NKU is committed to campus safety and security, and its facilities and landscaping are maintained in a manner that minimizes hazardous conditions. Operations and Maintenance helps keep university buildings and grounds safe and secure. The director of Operations and Maintenance, or his designated representative, inspects campus facilities regularly, promptly makes repairs affecting safety and security and responds to reports of potential safety and security hazards (such as broken windows and locks). Shrubbery, trees and other vegetation on campus are trimmed on a regular basis by the Grounds and Horticulture staff. University Police assists Operations and Maintenance personnel by reporting potential safety and security hazards. Students, faculty, staff and visitors are encouraged to report any equipment problems, safety or

security hazards by calling Operations and Maintenance at (859) 572-5660 and/or University Police at (859) 572-5500.

The campus' overall safety and security program is supplemented by a variety of technological systems including; access control, emergency phones and fire detection, suppression and reporting systems. Other members of the university community are helpful when they report equipment problems to University Police and Operations and Maintenance.

## NKU GRANT COUNTY CENTER



NKU Grant County Center is meeting a true need in the southern part of the northern Kentucky region by making higher education accessible to residents of Grant County and other predominantly rural counties, which we hope will help close the educational attainment discrepancy that exists between the urban and rural sections of our region. This will increase the number of highly educated and employable population in Grant, Gallatin, Owen, Pendleton, southern Boone and southern Kenton counties.

As an extended campus of a public comprehensive university, NKU's Grant County Center delivers innovative, student-centered education and engages in impactful scholarly and creative endeavors, all of which empower our graduates to have fulfilling career and meaningful lives, while contributing to the economic, civic and social vitality of the community. This mission directly aligns with NKU's mission and values by putting our students first, leading with excellence and making a lasting impact.

NKU Grant County Center assists rural students in their initial collegiate career by providing a campus to obtain Foundation in Knowledge college credit hours and promote transdisciplinary options in their transition to the NKU main campus. Our innovative academic programs and unparalleled commitment to student success both in the classroom and beyond have helped us earn the designation of one of America's Best Colleges by Forbes Magazine for years.

NKU is committed to working with stakeholders to make our campuses safe and secure. The university has developed a series of policies and procedures to assist in these efforts. The information in this publication has been prepared to increase your awareness of the current programs that exist to assist you in protecting your safety and well-being. Portions are also provided in compliance with the federal law, specifically the Clery Act.

## LAW ENFORCEMENT PARTNERSHIPS

### For Grant County Campus

University Police does not respond to emergency calls at the Grant County campus and encourages faculty, staff and students to report any immediate threats to Williamstown Police Department by dialing 911 or, for non-emergency calls, dial (859) 824-3353.

### Crime Awareness Bulletin, Timely Warnings at Grant County

The administrator at the Grant County Center campus is responsible for preparing and distributing Crime Bulletins and timely warnings for their campus via email blast to their faculty, staff and students and/or by placing a bulletin in a public area on campus.

Grant County administrators recognize that some instances or crimes not triggering a timely warning can be addressed through similar means. When circumstances warrant, the campus administrator may release a crime awareness bulletin to inform the community to a particular string of incidents, such as a string of thefts or car break-ins. The intention is to bring about awareness and inform the community of particular incidents with the ultimate goal of preventing further occurrences.

Crime awareness Bulletins and Timely Warnings are placed in public areas on Grant County's campus and may also be placed on University Police's social media pages. Dissemination of such bulletins will be considered on a case-by-case basis.

### **Emergency Notifications at Grant County**

The administrator at the Grant County campus is responsible for preparing and distributing Emergency Notifications. The administrator relies largely on local resources, for example tornado sirens, weather radios, and/or communications from the Williamstown Police department, to obtain information for dissemination. If an incident arises that requires a police response the administrator would contact the Williamstown Police Department. Communication of the Emergency Notification could include in person contact, email blast and/or Norse Alert.

Emergency notifications will occur upon confirmation of a dangerous situation that poses a threat to safety on Grant County's campus. Such situations include:

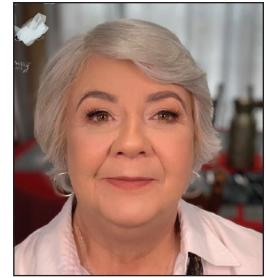
- Active shooter
- Fire
- National Weather Service-issued tornado warning for Grant County, Kentucky
- Hazardous materials release
- Presence of an explosive device  
Emergency notification may be delayed if it will compromise the efforts of first responders to contain and/ or resolve the situation.

As noted previously, components of the alert system can also be used to notify the community of closures, delays, utility failures or other similar events that may not be immediately life threatening.

## **A PERSON TO KNOW**

### **SHERRY CUCCHIARA**

Sherry Cucchiara is the director at the regional campus for NKU in Grant County. She joined NKU in 1997. Sherry was a first generation college student and Adult Learner earning her MPA in 2014 from NKU. She lives in Johnsville with her husband and german shepherd, Bella.



## **CAMPUS SECURITY AUTHORITIES (CSAS)**

The administrator of the Grant County campus provides the Clery Compliance Coordinator with a list of Campus Security Authorities (CSAs) that are at the Grant County campus. This information is updated as changes occur.

***"My sister started college after high school at NKU Grant County and graduated in 2020 with her teaching degree. In 2021, I followed in her footsteps and am now a college sophomore at NKU! Taking classes at the regional campus gave us both the opportunity to pursue higher education close to home and to be successful. College may not be an easy journey, but it is worth it".***

**- TORI HAGEDORN, DRY RIDGE, KY  
CURRENT NKU GRANT COUNTY STUDENT**

# GRANT COUNTY CENTER

## CAMPUS SAFETY AND SECURITY FOR 2022 ACTIVITY REPORTED FOR CALENDAR YEAR 2022

### Grant County Campus:

VAWA Offenses Reporting Table			
		Geographic Location	
OFFENSE	YEAR	On-Campus Property	Public Property
Domestic Violence	2022	0	0
	2021	0	0
	2020	0	0
Dating Violence	2022	0	0
	2021	0	0
	2020	0	0
Stalking	2022	0	0
	2021	0	0
	2020	0	0
Criminal Offenses Reporting Table			
		Geographic Location	
OFFENSE	YEAR	On-Campus Property	Public Property
Murder / Non-Negligent Manslaughter	2022	0	0
	2021	0	0
	2020	0	0
Manslaughter By Negligence	2022	0	0
	2021	0	0
	2020	0	0
Rape	2022	0	0
	2021	0	0
	2020	0	0
Fondling	2022	0	0
	2021	0	0
	2020	0	0
Incest	2022	0	0
	2021	0	0
	2020	0	0
Statutory Rape	2022	0	0
	2021	0	0
	2020	0	0
Robbery	2022	0	0
	2021	0	0
	2020	0	0

Aggravated Assault	2022	0	0
	2021	0	0
	2020	0	0
Burglary	2022	0	0
	2021	0	0
	2020	0	0
Motor Vehicle Theft	2022	0	0
	2021	0	0
	2020	0	0
Arson	2022	0	0
	2021	0	0
	2020	0	0
<b>Arrests and Disciplinary Referrals Reporting Table</b>			
		GEOGRAPHIC LOCATION	
OFFENSE	YEAR	On-Campus Property	Public Property
Arrests: Weapons: Carrying, Possessing Etc.	2022	0	0
	2021	0	0
	2020	0	0
Disciplinary Referrals: Weapons: Carrying, Possessing Etc.	2022	0	0
	2021	0	0
	2020	0	0
Arrests: Drug Abuse Violations	2022	0	0
	2021	0	0
	2020	0	0
Disciplinary Referrals: Drug Abuse Violations	2022	0	0
	2021	0	0
	2020	0	0
Arrests: Liquor Law Violations	2022	0	0
	2021	0	0
	2020	0	0
Disciplinary Referrals: Liquor Law Violations	2022	0	0
	2021	0	0
	2020	0	0

## GRANT COUNTY CAMPUS:

### Hate Crime Reporting

2022: Zero hate crimes to report

2021: Zero hate crimes to report

2020: Zero hate crimes to report

### Unfounded Crime Reporting

2022: Zero unfounded crimes to report

2021: Zero unfounded crimes to report

2020: Zero unfounded crimes to report

## CLERY DESIGNATED CRIME DEFINITIONS

The following definitions come from the Summary Reporting System (SRS) User Manual from the FBI's Uniform Crime Reporting Program and are used for purposes of reporting crimes under the Clery Act.

### **Criminal Homicide**

Murder and non-negligent manslaughter: the willful (non-negligent) killing of one human being by another.

### **Criminal Homicide**

Manslaughter by negligence: the killing of another person through gross negligence.

### **Robbery**

The taking or attempting to take anything of value from the care, custody or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.

### **Aggravated Assault**

An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm. (It is not necessary that injury result from an aggravated assault when a gun, knife or other weapon is used which could and probably would result in serious personal injury if the crime were successfully completed.)

### **Burglary**

The unlawful entry of a structure to commit a felony or a theft. For reporting purposes, this definition includes: unlawful entry with intent to commit a larceny or felony; breaking and entering with intent to commit a larceny; housebreaking; safecracking; and all attempts to commit any of the aforementioned.

### **Motor Vehicle Theft**

The theft or attempted theft of a motor vehicle. (Classify as motor vehicle theft all cases where automobiles are taken by persons not having lawful access even though the vehicles are later abandoned – including joyriding.)

### **Arson**

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

### **Weapons Law Violations**

The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment or use of firearms, cutting instruments, explosives, incendiary devices or other deadly weapons. This classification encompasses weapons offenses that are regulatory in nature.

### **Drug Abuse Violations**

The violation of laws prohibiting the production, distribution and/or use of certain controlled substances and the equipment or devices utilized in their preparation and/or use. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation or importation of any controlled drug or narcotic substance. Arrests for violations of state and local laws—specifically those relating to the unlawful possession, sale, use, growing, manufacturing and making of narcotic drugs.

### **Liquor Law Violations**

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

The following definitions come from the U.S. Department of Education Code of Federal Regulations as they relate to hate crimes and are used for purposes of reporting hate crimes under the Clery Act.

### **Hate Crime**

A crime that is reported to local police agencies or to a campus security authority that manifests evidence that the victim was intentionally selected because of the perpetrator's bias against the victim. Categories of bias include the victim's actual or perceived race, religion, gender, gender identity, sexual orientation, ethnicity, national origin and disability. (34 CFR § 668.46(a))

For purposes of Clery Act reporting, hate crimes are reported for the following crimes: criminal homicide; murder and non-negligent manslaughter; sex offenses

(rape, fondling, incest and statutory rape); robbery; aggravated assault; burglary; motor vehicle theft; arson; larceny-theft; simple assault; intimidation; and destruction/damage/vandalism of property. See above for definitions of criminal homicide, robbery, aggravated assault, burglary, motor vehicle theft and arson. See Section XII.A for definitions of sex offenses.

The definitions for larceny-theft, simple assault, intimidation and the destruction/damage/vandalism of property come from the Hate Crime Data Collection Guidelines and Training Manual from the FBI's Uniform Crime Reporting Program:

### **Larceny**

Theft (except motor vehicle theft): the unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another. Attempted larcenies are included. Embezzlement, confidence games, forgery, worthless checks, etc. are excluded.

### **Simple Assault**

An unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration or loss of consciousness.

### **Intimidation**

To unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct but without displaying a weapon or subjecting the victim to actual physical attack.

### **Destruction/Damage/Vandalism of Property**

To willfully or maliciously destroy, damage, deface or otherwise injure real or personal property without the consent of the owner or the person having custody or control of it.

## **VIOLENCE AGAINST WOMEN ACT (VAWA): VAWA OFFENSES STATISTICS INCLUDE DATING VIOLENCE; DOMESTIC VIOLENCE, SEXUAL ASSAULT AND STALKING.**

### **Domestic Violence, Dating Violence, and Stalking additions from the 2014 VAWA Negotiated Rulemaking Final Consensus Language:**

The Federal definition (from VAWA) of domestic violence: a felony or misdemeanor crime of violence committed:

- By a current or former spouse or intimate partner of the victim;
- By a person with whom the victim shares a child in common;
- By a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner;
- By a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; or
- By any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

The Federal definition (from VAWA) of Dating Violence: the term dating violence means violence committed by a person:

- Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- The existence of such a relationship shall be determined based on the reporting party's statement with consideration of:
  1. The length of the relationship;
  2. The type of relationship;
  3. The frequency of interaction between the persons involved in the relationship.
- Dating violence includes but is not limited to sexual or physical abuse or the threat of such abuse



- Dating violence does not include acts covered under the definition of domestic violence.

The Federal definition (from VAWA) of Stalking: engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- Fear for the person’s safety or the safety of others; or
- Suffer substantial emotional distress

*For the purpose of this definition:*

- Course of conduct means two or more acts, including but not limited to: acts which the stalker directly, indirectly or through third parties, by any action, method, device or means follows, monitors, observes, surveils, threatens or communicates to or about, a person or interferes with a person’s property
- Reasonable person means a reasonable person under similar circumstances and with similar identities to the victim.
- Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

## HATE CRIMES

A hate crime is any of the above offenses, and any other crime involving bodily injury, reported to a local police agencies or campus security authority that manifest evidence that the victim was intentionally selected because of the perpetrator’s bias, or the perpetrator perceived the person to be in one of the protected group categories. Additionally, on Aug. 14, 2008, the Clery Act was amended to include larceny/simple assault, intimidation and destruction/damage/vandalism (except arson) as reportable categories of hate crimes. These new reporting categories are only reported if motivated by bias as determined by one of the designated bias categories. The types of bias categories include: race, gender, religion, sexual orientation, ethnicity, national origin, gender identity and disability.

## Definitions

To ensure uniformity in reporting nationwide, the following definitions have been adopted for use in hate crime reporting:

**Bias:** a preformed negative opinion or attitude toward a group of persons based on their race, religion, disability, sexual orientation or ethnicity/national origin.

**Bias Crime:** a criminal offense committed against a person or property is motivated, in whole or in part, by the offender’s bias against a race, religion, disability, sexual orientation or ethnicity/national origin. This is also known as hate crime.

**Race:** a preformed negative attitude toward a group of persons who possess common physical characteristics (e.g., color of skin, eyes and/or hair; facial features, etc.) genetically transmitted by descent and heredity which distinguish them as a distinct division of humankind (e.g., Asians, blacks, whites).

**Religion:** a preformed negative opinion or attitude toward a group of persons who share the same religious beliefs regarding the origin and purpose of the universe and the existence or nonexistence of a supreme being (e.g., Catholics, Jews, Protestants, atheists).

**Sexual Orientation:** a preformed negative opinion or attitude toward a group of persons based on their actual or perceived sexual orientation. Sexual orientation is the term for a person’s physical, romantic and/or emotional attraction to members of the same and/or opposite sex, including lesbian, gay, bisexual and heterosexual (straight) individuals.

**Gender:** a preformed negative opinion or attitude toward a person or group of persons based on their actual or perceived gender, e.g., male or female.

**Gender Identity:** a preformed negative opinion or attitude toward a person or group of persons based on their actual or perceived gender identity, e.g., bias against transgender or gender non-conforming individuals. Gender non-conforming describes a person who does not conform to the gender-based expectations of society, e.g., a woman dressed in traditionally male clothing or a man wearing makeup.

A gender non-conforming person may or may not be a lesbian, gay, bisexual or transgender person but may be perceived as such.

**Ethnicity:** a preformed negative opinion or attitude toward a group of people whose members identify with each other, through a common heritage, often consisting of a common language, common culture (often including a shared religion) and/or ideology that stresses common ancestry. The concept of ethnicity differs from the closely related term “race” in that “race” refers to a grouping based mostly upon biological criteria, while “ethnicity” also encompasses additional cultural factors.

**National Origin:** a preformed negative opinion or attitude toward a group of people based on their actual or perceived country of birth. This bias may be against people that have a name or accent associated with a national origin group, participate in certain customs associated with a national origin group, or because they are married to or associate with people of a certain national origin.

**Disability:** A preformed negative opinion or attitude toward a group of persons based on their physical or mental impairments, whether such disability is temporary or permanent, congenital or acquired by heredity, accident, injury, advanced age or illness.

NOTE: Even if the offender was mistaken in their perception that the victim was a member of the group of the offender was acting against, the offense is still a bias crime because the offender was motivated by bias against the group.

## UNIFORM CRIME REPORTING DEFINITIONS

Kentucky is certified for National Incident Based Reporting System (NIBRS) reporting. University Police submits reports through the Kentucky Open Portal Solution (KyOPS), and crime statistics are obtained from those reports. Crime statistics as defined by the Uniform Crime Reporting (UCR) program for the following crimes are reported and occur on the property owned by the university. The UCR divides offenses into two groups: Part 1 and Part II offenses.

### PART 1 OFFENSES

#### **Criminal Homicide:**

- A) Murder and non-negligent manslaughter: the willful (non-negligent) killing of one human being by another. Deaths caused by negligence, attempts to kill, assaults to kill, suicides and accidental deaths are excluded. The program classifies justifiable homicides separately and limits the definition to:
  1. The killing of a felon by a law enforcement officer in the line of duty; or
  2. The killing of a felon, during the commission of a felony, by a private citizen.
- B) Manslaughter by negligence; the killing of another person through gross negligence. Traffic fatalities are excluded.

**Rape:** 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. Statutory offenses (no forced used—victim under age of consent) are excluded.

**Robbery:** the taking or attempted taking of anything of value from the care, custody, or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.

**Aggravated Assault:** an unlawful attached by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault is accompanied by the use of a weapon or by means likely to produce death or great bodily harm. Simple assaults are excluded.

**Burglary (breaking or entering):** the unlawful entry of a structure to commit a felony or a theft. Attempted forcible entry is included.

**Larceny-Theft (except motor vehicle theft):** the unlawful taking, carrying, leading or riding away of property from the possession or constructive possession of another. Examples are thefts of bicycles or automobile accessories, shoplifting, pocket-picking or the stealing of any property or article that is not taken by force and violence or by fraud. Attempted larcenies are included. Embezzlement, confidence games, forgery, worthless checks, etc., are excluded.

**Motor Vehicle Theft:** the theft or attempted theft of a motor vehicle. A motor vehicle is self-propelled and runs on land surface and not on rails. Motorboats, construction equipment, airplanes and farming equipment are specifically excluded from this category.

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

## PART II OFFENSES

**Other Assaults (simple):** assaults and attempted assaults which are not of an aggravated nature and do not result in serious injury to the victim. This includes subjecting a person to unlawful physical attack or in fear of bodily harm by word or action.

**Forgery and Counterfeiting:** the altering, copying or imitating of something, without authority or right, with the intent to deceive or defraud by passing the copy of thing altered or imitated as that which is original or genuine; or the selling, buying or possession of an altered, copied or imitated thing with the intent to deceive or defraud. Attempts are included.

**Fraud:** the intentional perversion of the truth for the purpose of inducing another person or other entity in reliance upon it to part with something of value or to surrender a legal right. Fraudulent conversion and obtaining of money or property by false pretenses, confidence games and bad checks, except forgeries and counterfeiting, are included.

**Embezzlement:** the unlawful misappropriation or misapplication by an offender to his/her own use or purpose of money, property or some other thing of value entrusted to his/her care, custody or control.

**Stolen Property; Buying, Receiving, Possessing:** buying, receiving, possessing, selling, concealing or transporting any property with the knowledge that it has been unlawfully taken, as by burglary, embezzlement, fraud, larceny, robbery, etc. Attempts are included.

**Vandalism:** to willfully or maliciously destroy, injure, disfigure or deface any public or private property, real

or personal, without the consent of the owner or person having custody or control by cutting, tearing, breaking, marking, painting, drawing, covering with filth or any other such means as may be specified by local law. Attempts are included.

**Weapons; Carrying, Possessing, etc.:** the violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment or use of firearms, cutting instruments, explosives, incendiary devices or other deadly weapons. Attempts are included.

**Prostitution and Commercialized Vice:** the unlawful promotion of or participation in sexual activities for profit, including attempts.

**Sex offenses (except forcible rape, prostitution and commercialized vice):** statutory rape, offenses against chastity, common decency, morals and the like. This includes the offense of fondling. Attempts are included.

**Drug Abuse Violations:** the violation of laws prohibiting the production, distribution and/or use of certain controlled substances. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation or importation of any controlled drug or narcotic substance. Arrests for violations of state and local laws, specifically those relating to the unlawful possession, sale, use, growing, manufacturing and making of narcotic drugs. The following drug categories are specified: opium or cocaine and their derivatives (morphine, heroin, codeine); marijuana; synthetic narcotics—manufactured narcotics that can cause true addiction (Demerol, methadone); and dangerous non-narcotic drugs (barbiturates, Benzedrine).

**Gambling:** to unlawfully bet or wager money or something else of value; assist, promote or operate a game of chance for money or some other stake; possess or transmit wagering information; manufacture, sell, purchase, possess or transport gambling equipment, devices or goods; or tamper with the outcome of a sporting event or contest to gain a gambling advantage.

**Offenses Against the Family and Children:** unlawful nonviolent acts by a family member (or legal guardian) that threaten the physical, mental or economic well-being or morals of another family member and that are not classifiable as other offenses, such as assault or sex offenses. Attempts are included.

**Driving Under the Influence:** driving or operating a motor vehicle or common carrier while mentally or physically impaired as the result of consuming an alcoholic beverage or using a drug or narcotic.

**Liquor Laws:** the violation of state or local laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession or use of alcoholic beverages, not including driving under the influence and drunkenness. Federal violations are excluded.

**Drunkenness:** to drink alcoholic beverages to the extent that one's mental faculties and physical coordination are substantially impaired. This excludes driving under the influence.

**Disorderly Conduct:** any behavior that tends to disturb the public peace or decorum, scandalizes the community or shocks the public sense of morality.

**Vagrancy:** the violation of a court order, regulation, ordinance or law requiring the withdrawal of persons from the streets or other specified areas; prohibiting persons from remaining in an area or place in an idle or aimless manner; or prohibiting persons from going from place to place without visible means of support.

**All Other Offenses:** all violations of state or local laws not specifically identified as Part I or Part II offenses, except traffic violations.

This information is provided as a part of NKU's continuing commitment to safety and security on campus in compliance with the Uniform Crime Reporting Act and the Jeanne Clery Act. Concerns, questions or complaints related to this document or the applicable statutes should be directed to the chief of police either by mail at Northern Kentucky University Police, 251 Louie B. Nunn Dr. Highland Heights, KY 41099; by email at [gaffinj@nku.edu](mailto:gaffinj@nku.edu); or by telephone (859) 572-5500.