

Benedictine College - Florence, Italy

2024 COMBINED ANNUAL SECURITY REPORT & FIRE SAFETY REPORT

Introduction

This report is provided in compliance with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act, as amended. It provides students and employees of the Florence, Italy campus of Benedictine College ("Benedictine FC" or "the College") with information on: the College's security arrangements, policies and procedures; programs that provide education on such things as drug and alcohol abuse, awareness of various kinds of sex offenses, and the prevention of crime generally; and procedures the College will take to notify the campus community in the event of an emergency. Its purpose is to provide students and employees with information that will help them make informed decisions relating to their own safety and the safety of others.

Policy for Preparing the Annual Report

This report is prepared by the Vice President of Student Life in cooperation with local law enforcement authorities and includes information provided by them as well as by the College's campus security authorities and various other elements of the College. Each year an e-mail notification is made to all enrolled students and employees that provides the website link to access this report. Prospective students and employees are also notified of the report's availability. Hard copies of the report may also be obtained at no cost by contacting the Student Life Office at 913-360-7500. The College is committed to taking the actions necessary to provide a safe and secure working/learning environment for all students and staff. As a member of the campus community, you can feel safe and comfortable knowing that security procedures are in place that represent best practices in the field and are constantly tested and re-evaluated for their effectiveness.

General Safety and Security Policies

Campus Security Personnel & Relationship with Local Law Enforcement-FC does not have its own campus security force. Rather, it relies on local Italian law enforcement authorities. There is no written memorandum of agreement between Benedictine-FC and local law enforcement for the investigation of alleged criminal offenses, but those local authorities cooperate with Benedictine-FC whenever the need arises.

While the College does not have any written agreements with Italian law enforcement agencies, it does maintain a close working relationship with local police.

Campus Security Authorities

The College has designated certain officials to serve as campus security authorities. Reports of criminal activity can be made to these officials. They in turn will ensure that the crimes are reported for collection as part of the College's annual report of crime statistics. The campus security authorities to whom the College would prefer that crimes be reported are listed below.

- Daniel Musso, Director of Study Abroad at 913-360-7975
- Program/Faculty Leader (may change each semester) at +39-345-241-1244
- Pietro Grillo, Residence Director at +39 346-416-3349

Reporting a Crime or Emergency

The College encourages accurate and prompt reporting of all criminal actions, emergencies, or other incidents occurring on campus, on other property owned by the College, or on nearby public property to the appropriate administrator and appropriate police agencies. Such a report is encouraged when the victim of a crime elects to, or is unable to, make such a report.

Crimes and emergencies can be reported at any time, seven days a week as follows:

- Local police: call 113
- Italian/European Emergency Hotline (equivalent of 911 in USA): call 112
- Hospital (Medical) Emergency: call 118
- Fire Brigade: call 115

Students, staff, and visitors should also report situations to one of the campus security authorities identified above. Once reported, the individual may also be encouraged to report the situation to the appropriate police agency. If requested, a college staff member will assist in making the report to police.

Anonymous incident reports can also be made at any time to one of the above-mentioned campus security authorities by phone or by completing the online form at https://benedictinecollege.formstack.com/forms/incident_report.

Confidential Reporting

The College will protect the confidentiality of victims. Only those with a need to know the identity for purposes of investigating the crime, assisting the victim or disciplining the perpetrator will know the victim's identity.

Benedictine-FC will protect the confidentiality of victims, including not disclosing personally identifiable information in publicly available records, to the extent permitted by law. Only those with a need to know the identity for purposes of investigating the crime, assisting the victim, or disciplining the perpetrator will know the victim's identity.

Pursuant to the College policy, when an employee overseas who is not a confidential resource becomes aware of alleged misconduct under that policy (including, but not limited to, dating violence, domestic violence, sexual assault, and stalking), the employee is responsible for reporting that information, including the status of the parties if known, to the Title IX Coordinator. A victim of other types of crimes (e.g., aggravated assault, burglary, etc.) who

does not want to pursue action within the College disciplinary system, or the criminal justice system is nevertheless encouraged to make a confidential report to a campus security authority. With the victim's permission, a report of the details of the incident can be filed without revealing the victim's identity. Such a confidential report complies with the victim's wishes, but still helps Benedictine-FC take appropriate steps to ensure the future safety of the victim and others. With such information, Benedictine-FC can keep an accurate record of the number of incidents involving students, determine where a pattern of crime may be developing and alert the community as to any potential danger. These confidential reports are counted and disclosed in the annual crime statistics for Benedictine-FC.

College encourages its pastoral and professional counselors, if and when they deem it appropriate, to inform the person they are counseling to report crimes on a voluntary, confidential basis for inclusion in the annual report of crime statistics.

Security of and Access to Campus Facilities

All Benedictine-FC facilities are set at Villa Morghen, a beautiful Italian villa operated by the organization Beato Bernardo Tolomei Soc. Coop. Sociale. Only Benedictine-FC personnel, their guests and Beato Bernardo Tolomei Soc. Coop. Sociale have immediate access to the spaces used by the Study Abroad Program. All student dorm rooms and common rooms throughout campus are secured through a hard-key system.

Curfew: Doorkeeper service at Villa Morghen is from 7:30-24:00 (12 am) Sunday – Wednesday and 7:30-1:30 (am) Thursday – Saturday. Curfew time may change at Villa Morghen's or the Benedictine-FC faculty's discretion. Students returning after curfew must ask for permission and make arrangements with the Resident Director or Resident Assistants for door opening.

Benedictine College will make reasonable efforts to protect personal property; however, the College is not liable for the loss of, theft of, or damage to personal property. Authorized personnel may enter student rooms without the residents' permission for cleaning and maintenance purposes, fire and safety inspections, damage inspection, in emergency situations and to enforce college policies as indicated in the Florence Handbook.

Security Considerations in the Maintenance of Facilities

Benedictine College leases Villa Morghen for the Study Abroad Program (i.e., dorm rooms, classrooms, dining hall, etc.) from Beato Bernardo Tolomei Soc. Coop. Sociale. A representative appointed by Beato Bernardo Tolomei Soc. Coop. Sociale is responsible for the day-to-day safety and maintenance of the facility. Benedictine-FC staff (Study Abroad Director, Program Director/Faculty Leader, Resident Director and Resident Assistants) assist by routinely walking through the area to note any discrepancies and by conducting semiannual inspections. Any safety-related concerns are reported to the Beato Bernardo Tolomei Soc. Coop. Sociale representative.

Educational Programs Related to Security Awareness and Prevention of Criminal Activity

The College seeks to enhance the security of its campus and the members of the campus community by periodically presenting educational programs to inform students and

employees about campus security procedures and practices, to encourage students and employees to be responsible for their own security and the security of others and to inform them about the prevention of crimes. These programs are discussed below.

Students desiring to participate in the Study Abroad Program at Benedictine-FC are required to attend pre-departure orientation sessions held on the main campus. These pre-departure sessions are designed to ensure that prospective students are prepared for a semester in Italy. The Study Abroad Director reviews the Florence Handbook and covers key safety-related topics such as how to maintain awareness of surroundings, how to maintain a low profile, and how to respond to emergency situations. All materials discussed in these resources are available in the Office of International Education.

Upon arrival in Italy, all students again undergo safety-related discussions that are held during their orientation process. Student Life policies are reviewed in addition to covering the topics of the college's travel recommendations, emergency contact procedures with college personnel and local police, seeking medical help and health coverage, alcohol awareness, curfew times, and explaining which resources exist on the Benedictine-FC to assist in their travel planning process. Additionally, the Study Abroad Director and residence staff address the dangers of rape, acquaintance rape, and other non-forcible sex offenses, especially in the context of alcohol and drugs.

The Study Abroad Director strongly recommends that all American students are registered online in the Smart Traveler Enrollment Program at the U.S. Embassy for their semester in Florence. If one of our students needs assistance in another country, the embassy can communicate with another embassy and help American citizens. For all non-American students, the Benedictine-FC staff will assist those individuals to contact their respective embassy if needed.

Before College-sponsored excursions/pilgrimages, as well as before their first free travel weekend, students receive a crime and personal safety briefing. The Study Abroad Director and Resident Director instructs students in the best methods of how to plan, organize, and handle unforeseen situations that arise. The Benedictine-FC staff also provides on-going updates through email, bulletin boards, and meetings based on the current environment and recent events.

Note: The provisions of the Family Educational Rights and Privacy Act of 1974 (FERPA) are designed to protect the privacy and rights of Americans, but occasionally they complicate efforts to assist citizens abroad. As a rule, consular officers may not reveal information regarding an individual American's location, welfare, intentions, or problems to anyone, including family members and congressional representatives, without the expressed consent of that individual. Although sympathetic to the distress this can cause concerned families, consular officers must comply with the provisions of FERPA.

Monitoring Off Campus Locations of Recognized Student Organizations

The College does not have any officially recognized student organizations with off campus locations and therefore does not monitor or record criminal conduct occurring at such locations.

Disclosure of the Outcome of a Crime of Violence or Non-Forcible Sex Offense

Upon written request, the College will disclose to the alleged victim of a crime of violence (as that term is defined in section 16 of title 18, United States Code), or a non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by the College against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased as a result of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of the paragraph.

The previous paragraph does not apply to victims of dating violence, domestic violence, sexual assault, or stalking because under the Violence Against Women Act both the accused and accuser in these cases are given the results without the need to make a written request.

Drug and Alcohol Policy

Benedictine-FC is committed to creating and maintaining an environment that is free of alcohol abuse. The College prohibits the possession, use, and sale of alcohol beverage on campus or as any part of the College's activities, unless it is done in accordance with applicable Benedictine-FC policies.

Benedictine-FC Alcohol Policy

Benedictine-FC Student Life policies and procedures are consistent with Benedictine College's main campus policies and procedures. All members of the Benedictine-FC community are expected to abide by the law, conduct themselves in a manner that positively reflects themselves and the College, and share responsibility for the effectiveness of this policy.

- Consumption of alcoholic beverages is not permitted in students' residential rooms.
- No alcoholic beverages will be provided under the Florence program meal plan, though students may drink wine at dinner.
- Drinking alcohol in common areas (TV room, Cantina, Courtyard, etc.) is not permitted before dinner (around 6:30 pm; subject to change).
- Wine and beer may be permitted on special occasions, such as BBQs, festive lunches, or other student life activities with prior approval from the Residence Director.
- Cocktails or drinking parties are not allowed in the program residences, unless approved by the Residence Director and the residence staff.
- No individual(s) may interfere with the atmosphere that is expected in the residence hall, where the primary purpose is the educational pursuits of the residents.

The Program Director/Faculty Leader and Residence Director reserve the power to restrict the use of alcohol as a response to improper behavior.

Drinking Age: Minimum: 18 in Italy, therefore, Benedictine-FC students 18 and older are permitted to drink alcohol in Italy.

Cultural Differences: It is important to understand while living an educational experience in Italy that the attitude toward alcohol is much different in Italy than in the US. Drinking wine is part of the social experience, but not the focus of it in Italy. Public drunkenness is illegal

and excessive drinking is not acceptable. Drink responsibly. Be aware that out of control drinking has caused US citizens to be sent home, to be seriously injured, or even die when they are abroad.

The College has a well-defined policy on both illicit drugs and controlled substance usage for its students. Existing policies prohibit the unlawful possession, use, and distribution of illicit drugs/drug paraphernalia by students on college property or as a part of college-sanctioned activities.

All members of the College community are expected to abide by state and federal laws, to conduct themselves in a manner reflecting credit on themselves and the College, and to share responsibility for the functioning of this policy.

Consequences

Benedictine-FC students sign the Study Abroad Agreement and the Waiver Conditions and Responsibility, acknowledging that “Benedictine College has the right to retain, or refuse to retain, any person(s) as a member(s) of the college-sponsored study abroad program/trip if, in the sole opinion of Benedictine College, or its representative, the person’s mental, physical, or emotional condition or his/her actions or behavior appear to have potential to interfere with the rights, welfare, or enjoyment of other participants.”

According to the Florence Handbook, misconduct abroad can lead to dismissal from the program, loss of academic credit, and may result in further sanctions such as suspension or dismissal from Benedictine College. Misconduct abroad refers to a student’s actions that, according to the judgment of the Study Abroad Director and/or other officials of the program, jeopardize the student’s own welfare or that of fellow students and/or the program itself.

Additionally, Benedictine-FC enforces Italian drug and alcohol laws. Students and employees who engage in unlawful or unauthorized manufacture, distribution, dispensation, possession, or use of controlled substances and illegal drugs may be subject to criminal prosecution as well as to college disciplinary sanctions.

Italian Drug and Alcohol Laws (as researched by the Benedictine-FC Program Director)

National drug laws in Italy

In Italy, the Consolidated Law, adopted by Presidential Decree No 309 on 9 October 1990 and subsequently amended, provides the legal framework for the trade, treatment and prevention, and prohibition and punishment of illegal activities in the field of drugs and psychoactive substances.

Drug use itself is not mentioned as an offense, but possession for personal use is punishable by administrative sanctions (such as the suspension of a driving license or other privileges). If a person is found in possession of illicit drugs for the first time, administrative sanctions are not usually applied, but, instead, the offender receives a warning from the local Prefect and a formal request to refrain from use. A socio-rehabilitation and therapeutic programme may be offered in addition to administrative sanctions.

The threshold between personal possession and trafficking is determined by the circumstances of the specific case, such as the act, possession of tools for packaging, different types of drug possessed, the number of doses in excess of an average daily use, the means of organization, etc.

Source: <https://www.politicheantidroga.gov.it/media/2549/country-drug-report.pdf>

Alcohol Laws in Italy

In Italy the legal drinking age is 18.

Italy has no national laws against public drinking specifically, although local municipalities can issue regulations (*ordinanza municipale*) that prohibit public drinking at certain locations of the municipality, or during specific times. Local regulations must also set the fines issued to offenders.

Source: https://en.m.wikipedia.org/wiki/Drinking_in_public#:~:text=on%20the%20streets.-Italy,the%20fines%20issued%20to%20offenders.

The general legal limit of alcohol in the blood of drivers is 0.5 g/l (0.05%).
A special limit of 0.00% applies for newly licensed drivers having held their driving licence for less than 3 years, young drivers up to 21, as well as for professional drivers.
Of course, driving under the influence of narcotics and psychotropic substances is also forbidden.

FINES for drunk driving (article 186, paragraph 2, Italian Highway Code): 527 to 6,000 Euros according to blood alcohol level.

OTHER SANCTIONS: Confiscation and/or withdrawal of the driving licence; imprisonment up to 1 year.

PENALTY POINTS on driving licence: -10 out of 20 full starting points.

FINES for drunk driving for newly licensed drivers having held their driving licence for less than 3 years, young drivers up to 21 and professional drivers (art. 186bis, paragraph 2, Italian Highway Code): 163 to 658 Euros.

PENALTY POINTS: on driving licence: -5 out of 20 full starting points (These sanctions are doubled in case the driver causes an accident).

FINES for driving under the influence of narcotics and psychotropic substances (art. 187, Italian Highway Code): 1,500 to 6,000 Euros.

OTHER SANCTIONS: Confiscation and/or withdrawal of the driving licence; imprisonment up to 1 year.

PENALTY POINTS: on driving licence: -10 out of 20 full starting points.

Source:

https://www.aci.it/fileadmin/documenti/viaggia_con_noi/pdf/Driving_in_Italy_information_forvisiting_motorists/Blood-alcohol.pdf

Drug and Alcohol Abuse Prevention Program

In compliance with the Drug Free Schools and Communities Act (DFSCA), the College has a drug and alcohol abuse and prevention program. Information is distributed annually to students and employees regarding the College's prohibition of unlawful drug and alcohol use and sanctions for violating the College's drug and alcohol policies, legal penalties under various laws for violating their prohibitions on drug and alcohol use, the health effects from abusing these substances, and a description of the educational programs aimed at preventing abuse and the resources available to individuals with a substance abuse problem. Further, the College conducts a biennial review of its drug and alcohol abuse prevention program to determine its effectiveness and ensure that sanctions are being consistently enforced. A copy of the biennial review can be obtained by contacting Dr. Linda Henry, Vice President of Student Life or survey results may be viewed online at <https://www.benedictine.edu/student-life/health/alcohol-drug/statistics/>. More information about the program, including the College's drug and alcohol policies for students can be located at <https://www.benedictine.edu/student-life/health/alcohol-drug> or by contacting the Student Life Office. In addition, employee policies related to alcohol and drugs can be found in the Employee Handbook at <https://www.benedictine.edu/resources/employee-handbook>.

More information about the program, including the College's drug and alcohol policies for students, can be located at <http://www.benedictine.edu/student-life/health/alcohol-drug/index> or by contacting the Student Life Office.

In addition, employee policies related to alcohol and drugs can be found in the Employee Handbook at <https://www.benedictine.edu/resources/employee-handbook>.

Also, note that the Benedictine College Counseling Center utilizes the prevention model, assisting students by anticipating and intervening in situations where substance abuse may negatively influence student performance in the community and environment. Individual counseling, alcohol and other drug use assessment, referral for further evaluation and treatment, and educational programming are important components of this service. Contact: The Counseling Center: <https://www.benedictine.edu/student-life/health/counseling-center/index> or 913-360-7621.

The College encourages any students and employees who have a problem with the use of drugs or alcohol to seek professional advice and treatment. Benedictine College provides or can assist in arranging this support by contacting the Study Abroad Director or Resident Director. English-speaking doctors are available in Florence. A list of English-speaking doctors and medical facilities in Florence is provided at the American Consulate General in Florence.

Information on available drug and alcohol abuse education programs, including the health effects of drug and alcohol abuse and criminal penalties for violating Italian drug and alcohol laws is available in the office of Daniel Musso, Director of International Education (Study Abroad Director).

Policies, Procedures, and Programs Related to Dating Violence, Domestic Violence, Sexual Assault, and Stalking

Consistent with applicable laws, the College prohibits dating violence, domestic violence, sexual assault, and stalking. The College's policy used to address complaints of this nature, as well as the procedures for filing, investigating and resolving complaints, may be found at:

- Title IX Sexual Harassment Policy: <https://www.benedictine.edu/about/policies/title-ix>
- Student Handbook: <https://www.benedictine.edu/resources/student-handbook>
- Employee Handbook: <https://www.benedictine.edu/resources/employee-handbook>
- Faculty Handbook: <https://www.benedictine.edu/resources/faculty-handbook>

The following sections of this report discuss the College's educational programs to promote the awareness of dating violence, domestic violence, sexual assault and stalking; provides information concerning procedures students and employees should follow and the services available in the event they do become a victim of one of these offenses, and advises students and employees of the disciplinary procedures that will be followed after an allegation that one of these offenses has occurred.

Primary Prevention and Awareness Program:

The College conducts a Primary Prevention and Awareness Program (PPAP) for all incoming students and new employees. The PPAP advises campus community members that the College prohibits the offenses of dating violence, domestic violence, sexual assault and stalking. They are also informed of the topics discussed below, including relevant definitions, risk reduction, and bystander intervention.

Crime Definitions

Although the PPAP includes instruction on certain definitions under Kansas law, any student or employee participating in Benedictine-FC study abroad program is instructed of the following summary of definitions as described in Italian law:

Definitions under Italian Law:

Acts of sexual assault, dating violence, domestic violence and stalking occurring within the context of interpersonal relationships may be criminal offenses under Italian Law.

Definitions under Italian Law:

Crime Type	Definitions
Dating Violence	Based on good faith research, there is no specific definition or prohibition of “dating violence” under Italian law. However, private violence is defined as the offense committed by “anyone who, by violence or threat, compels others to do, tolerate or refrain from doing something” (Art. 610 Criminal Code). This law may include those in a dating relationship as well.
Domestic Violence	The offense committed by “anyone who mistreats a person within his or her family or in any way cohabiting with him or her, or a person subject to his or her authority or entrusted to him or her for purposes of education, instruction, care, supervision or

	custody, or for the practice of a profession or art” (Art. 572 Criminal Code).
Sexual Assault	The offense committed by “anyone who, by violence or threat, or by abuse of authority, compels someone to perform or submit to sexual acts” (Art. 609-bis Criminal Code).
Stalking	The offense committed by “anyone who, by repeated conduct, threatens or molests someone in such a way as to cause a lasting and severe state of anxiety or fear, or to arouse a justified fear for their own safety or that of a near relation or a person associated with him or her by an affective relationship, or to compel that person to alter his or her own living habits” (Art. 612-bis Criminal Code).
Consent	Based on good-faith research, the College has determined that consent (as it relates to sexual activity) is not defined under Italian law.

Acts of sexual assault, dating violence, domestic violence and stalking occurring within the context of interpersonal relationships may be criminal offenses under Italian Law.

A recent online article, <http://www.ilpost.it/2017/09/10/violenza-sessuale-stupro-consenso-firenze/>, indicates the Italian legislative discipline of sexual crimes does not explicitly attribute a central role to consent, but is based on the fact that sexual aggression, to be prosecuted and punished, must have certain characteristics: violence, threat, and constriction. However, the case law in practice has exceeded the requirement of compulsive means of violence by approaching a consensual model. If the definition of consent does not explicitly derive from the code of law, over the years there has been an orientation that has consolidated a jurisprudence of consent that tends to take into account positive and non-negative behavior: it considers that consent to sexual intercourse must be peaceful, based on affirmative behavior (it is not necessary to be verbal) and must not be interrupted, as it concerns a subjective sphere in which the dignity and liberty of each and every one are safeguarded.

College Definition of Consent

Though neither Kansas law nor Italian law specifically defines consent (as it relates to sexual activity), the College uses the following definition of consent in its Sexual Harassment Policy for the purpose of determining whether sexual violence (including sexual assault) has occurred. Note that the Title IX Sexual Harassment Policy does not apply to Benedictine College’s Florence program, although this is the definition that would likely be used in addressing allegations of dating violence, domestic violence, sexual assault, and stalking.

“Consent” refers to words or actions that a reasonable person in the perspective of the Respondent would understand as agreement to engage in the sexual conduct at issue. A person who is Incapacitated is not capable of giving Consent. Consent must be given voluntarily. It cannot be procured through physical violence, threats, blackmail, or other unreasonable pressure for sexual activity. Consent to some form of sexual activity cannot be automatically taken as consent to any other form of sexual activity. Previous relationships or prior consent do not imply consent to future sexual acts. In order to give effective consent, a person must be of legal age.

Risk Reduction

If you find yourself in an uncomfortable sexual situation, these suggestions may help you reduce your risk:

- Make your limits known before going too far.
- You can withdraw consent to sexual activity at any time. Do not be afraid to tell a sexual aggressor “NO” clearly and loudly.
- Try to remove yourself from the physical presence of a sexual aggressor. Be direct as possible about wanting to leave the environment.
- Grab someone nearby and ask them for help.
- Be responsible about your alcohol and/or drug use. Alcohol and drugs can lower your sexual inhibitions and may make you vulnerable to someone who views an intoxicated/high person as a sexual opportunity.
- Attend large parties with friends you trust. Watch out for your friends and ask that they watch out for you.
- Be aware of someone trying to slip you an incapacitating “rape drug” like Rohypnol or GHB.

If you find yourself in the position of being the initiator of sexual behavior, these suggestions may help you to reduce your risk of being accused of sexual assault or another sexual crime:

- Remember that you owe sexual respect to the other person.
- Don’t make assumptions about the other person’s consent or about how far they are willing to go.
- Remember that consent to one form of sexual activity does not necessarily imply consent to another form of sexual behavior.
- If your partner expresses a withdrawal of consent, stop immediately.
- Clearly communicate your sexual intentions so that the other person has a chance to clearly tell you, their intentions.
- Consider “mixed messages” a clear sign that the other person is uncomfortable with the situation and may not be ready to progress sexually.
- Don’t take advantage of someone who is really drunk or on drugs, even if they knowingly and intentionally put themselves in that state. Further, don’t be afraid to step in if you see someone else trying to take advantage of a nearly incapacitated person.
- Be aware of the signs of incapacitation, such as slurred speech, bloodshot eyes, vomiting, unusual behavior, passing out, staggering, etc.

It is also important to be aware of the warning signs of an abusive person. Some examples include past abuse; threats of violence or abuse; breaking objects; using force during an argument; jealousy; controlling behavior; quick involvement; unrealistic expectations; isolation; blames others for problems; hypersensitivity; cruelty to animals or children; “playful” use of force during sex; Jekyll-and-Hyde personality.

Bystander Intervention

In addition to reporting incidents to appropriate authorities, below are some ways in which individuals can take safe and positive steps to prevent harm and intervene when there is a risk of dating violence, domestic violence, sexual assault, or stalking against another person.

- Look out for those around you.
- Realize that it is important to intervene to help others.
- Treat everyone respectfully. Do not be hostile or an antagonist.
- Be confident when intervening.
- Recruit help from others if necessary.
- Be honest and direct.
- Keep yourself safe.
- If things get out of hand, don't hesitate to contact the police.

Other Information Covered by the PPAP

The PPAP also provides information on possible sanctions and protective measures that may be imposed following a determination that an offense of dating violence, domestic violence, sexual assault, or stalking has occurred, an explanation of the disciplinary procedures that will be followed when one of these offenses is alleged, the rights of the parties in such a proceeding, available resources, and other pertinent information. Much of this information is set forth in the upcoming sections of this security report.

Ongoing Prevention and Awareness Campaign:

The College also conducts an Ongoing Prevention and Awareness Campaign (OPAC) aimed at all students and employees. This campaign covers the same material as provided in the PPAP but is intended to increase the understanding of students and employees on these topics and to improve their skills for addressing the offenses of dating violence, domestic violence, sexual assault and stalking.

PPAP and OPAC Programming Methods:

Students participating in the Study Abroad Program at Benedictine-FC will already have been enrolled at the main Benedictine College campus in Atchison, Kansas for at least one year. Therefore, they will have participated in the College's Primary Prevention and Awareness Program (PPAP). The College conducts a Primary Prevention and Awareness Program (PPAP) for all incoming students and new employees. In it they are specifically advised that the College prohibits the offenses of domestic violence, dating violence, sexual assault, and stalking. Methods include, but are not limited to, online presentations, distribution of written materials, periodic email blasts, and guest speakers. The programs are carried out by collaborating efforts of the Vice President of Student Life and departmental staff, Director of Human Resources, Campus Security, and the Title IX Coordinator.

A summary of this programming is provided below:

- Providing Title IX/VAWA educational training, including healthy relationships information, to all new students during orientation.
- Providing Title IX/VAWA training for all faculty, staff, and employees. All new employees complete an online training module on these topics upon hire and retake the online training each year.
- Distributing a Title IX/VAWA informational brochure to all students
- Updating and maintaining a Title IX/VAWA webpage on the College website that includes information about the Sexual Harassment Policy, available resource, etc.
- Providing a Health Fair on campus

- Conducting various bystander intervention and healthy relationships workshops
- Hosting Alcohol Education programs and healthy relationships speakers on campus as well as an Awareness Campaign via posters across campus
- Promoting campus activities of student lead Alcohol and Drug Task Force peer group
- Offering educational sessions and literature in coordination with nationally recognized observances, such as Sexual Assault Awareness Month
- Providing training for Title IX/VAWA Investigators and Student Life staff regarding expectations/challenges

Procedures to Follow if You are a Victim of Dating Violence, Domestic Violence, Sexual Assault, or Stalking:

If you are a victim of a sexual assault, domestic violence, dating violence, or stalking, go to a safe place and call the local police at 113 or the Program Director/Faculty Leader at +39-345-241-1244. The Program Director/Faculty Leader will notify the Study Abroad Director for assistance. You may also contact the Resident Director at +39 346-416-3349. You may also contact the College's Title IX Coordinator Dr. Sean Mulcahy at 913-360-7965, smulcahy@benedictine.edu or the College's Deputy Title IX Coordinator, Mr. Eric Burghart, at 913-360-7500, eburghart@benedictine.edu.

Victims will be notified in writing of the procedures to follow, including:

1. To whom and how the alleged offense should be reported (contact the Title IX Coordinator or refer to the other resources listed in this report).
2. The importance of preserving evidence that may be necessary to prove the offense in a criminal proceeding or disciplinary action or to obtain a protective order.
3. The victim's options regarding notification to law enforcement, which are: (a) the option to notify either on-campus or local police; (b) the option to be assisted by campus security authorities in notifying law enforcement if the victim so chooses (the institution is obligated to comply with such a request if it is made); and (c) the option to decline to notify such authorities.
4. Where applicable, the rights of victims and the institution's responsibilities regarding orders of protection, no-contact orders, restraining orders, or similar lawful orders issued by a criminal, civil, or tribal court.

Preservation of Evidence & Forensic Examinations

Victims of physical assault are advised to not remove clothing items worn during or following an assault, as they frequently contain valuable fiber, hair, and fluid evidence. Don't bathe or wash, or otherwise clean the environment in which the assault occurred. You can obtain a forensic examination at Ospedale Santa Maria Annunziata, Via Antella 58, 50012 Ponte a Niccheri, Bagno a Ripoli (Firenze), +39 055-69361.

Completing a forensic examination does not require you to file a police report, but having a forensic examination will help preserve evidence in case you decide at a later date to file a police report.

Victims are also advised to retain evidence in electronic formats (e.g., text messages, emails, photos, social media posts, screenshots, etc.). Such evidence is valuable in all situations, and it may be the only type of evidence available in instances of stalking.

Security/Law Enforcement & How to Make a Police Report

- Benedictine-FC “campus security authorities” - Daniel Musso, Study Abroad Director at +39 347-190-7603 or +1 913-360-2790; Program Director/Faculty Leader at +39-345-241-1244; or Pietro Grillo, Residence Director at +39 346-416-3349
- Local police at 113 or Italian/European Emergency Hotline (equivalent of 911 in USA) by calling 112
- To make a police report, a victim should contact the local police agency listed above either by phone or in-person. The victim should provide as much information as possible, including name, address, and when and what occurred, to the best of the victim’s ability.

Information about Legal Protection Orders

- Benedictine-FC victims may obtain protective/restraining orders in Italy by contacting the police at 113 or seeking a lawyer. There must be enough evidence to submit the case to the Procura (similar to the District Attorney’s office), who will issue a temporary injunction before a judge decides the case. The United States Embassy in Italy has detailed information on best practices with respect to seeking medical and legal assistance if you are a victim of a crime in Italy. For more information, please see: <https://it.usembassy.gov/u-s-citizen-services/>
- In Kansas, victims may obtain a Protection from Abuse Order, which provides protective relief for victims of dating violence, domestic violence, or sexual assault. A victim of stalking may also obtain a Protection from Stalking Order. Information about these protection orders and required forms can be found at: <http://kscourts.org/programs/domestic-violence/default.asp>. There are three main types of protection orders in Kansas:
 - Emergency (only applies to Protection from Abuse Orders) – expires at 5:00 p.m. on the first day when the court resumes business.
 - Temporary – remains in effect until a final order is served or until it is terminated by order of the court.
 - Final – will expire after one year or on the date stated in the order unless an extension or modification is requested and granted from the court before the order expires.
- Petition for Order of Protection should be filed for in the Atchison District Court, located in the Atchison Courthouse. The address is: 423 North 5th Street, Atchison, Kansas 66002. The phone number for the Clerk of District Court is 913-804-6060.
- Information about obtaining an Order of Protection in Atchison Kansas can be found by contacting the Clerk of the District Court or the Atchison Police Department.
- The circuit court clerk’s office can provide the necessary forms and may assist in completing the forms. A victim should be prepared to present documentation and/or other forms of evidence when filing for an order of protection.
- Victims may contact local domestic violence and sexual assault advocates for assistance in obtaining a protection order.
 - The Atchison Police Department encourages victims of domestic violence to work with advocates through the Alliance Against Family Violence in Leavenworth, KS. Their crisis hotline is 913-675-7217. The Kansas state-wide Crisis Hotline is 1-888-363-2287.

- When a protection order is granted, it is enforceable statewide. If you have obtained a protection order and need it to be enforced in your area, you should contact the local police department.

The College will also enforce any temporary restraining order or other no contact order against the alleged perpetrator from a criminal, civil, or tribal court. Any student or employee who has a protection order or no contact order should notify the Title IX Coordinator and provide a copy of the restraining order so that it may be kept on file with the institution and can be enforced on campus, if necessary. Upon learning of any orders, the institution will take all reasonable and legal action to implement the order.

The College does not issue legal orders of protection. However, as a matter of institutional policy, the institution may impose a no-contact order between individuals in appropriate circumstances. The institution may also issue a “no trespass warning” if information available leads to a reasonable conclusion that an individual is likely to cause harm to any member of the campus community. A person found to be in violation of a No Trespass Warning may be arrested and criminally charged.

Available Victim Services:

Victims will be provided written notification about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available to them, both within the College and in the surrounding community.

Those services include:

- Pastoral Ministry for Benedictine-FC: Fr. Scott Murphy, LC, smurphey@legionaries.org
- Doctor in Settignano: Dr. Raffaele Sorso, +39 338-462-8158 or +39 055-660-235
- Hospital/Emergency Room: Ospedale Santa Maria Annunziata, Via Antella 58, 50012 Ponte a Niccheri, Bagno a Ripoli (Firenze), +39 055-69361
- OR: Ospedale Santa Maria Nuova, Piazza Santa Maria Nuova 1, 50122 Firenze, +39 055-69381
- Florence American Consulate: call 055-266-951
- Rome American Embassy: call 06-46741 (switchboard)

College Resources

- Benedictine College Counseling Center: 913-360-7621
- Benedictine College Student Health Center: 913-360-7117
- Benedictine College Ministry Department: Fr. Scott Murphy, LC, 913-360-7735 or smurphey@legionaries.org
- Benedictine College Department of Safety and Security: 913-360-8888
- Benedictine College Financial Aid Office: 913-360-7484. Sometimes a victim of a crime may feel the need to take a leave of absence from school. If a student is considering a leave of absence based on the circumstances of a complaint, he/she should understand there may be financial aid implications in taking such leave. This should be discussed with financial aid personnel, and the Title IX Coordinator can assist in facilitating this conversation if desired. The College’s financial aid website can be found at: <https://www.benedictine.edu/admission/financial-aid/index>.

- Benedictine College Center for International Education: 913-360-7538
- Benedictine College Resident Director (RD) On-Call number: 913-360-7070
- Students and employees may receive professional, confidential, no-cost crisis counseling services through the College Counseling Center, located in the Student Health Building. Counseling is available even if a violation hasn't been reported. The phone number is 913-360-7621.

The Alliance Against Family Violence provides 24 Hour support for victims of sexual assault and dating, or domestic violence and these services can be reached by calling 1-913-675-7217. Victims seeking support can also share information in confidence to official clergy on campus. Appointments can be scheduled with Fr. Ryan Richardson, College Chaplain, and Fr. Brett Taira, Assistant Chaplain, by calling 913-360-7735.

State/Local Resources in Kansas

- Kansas Legal Services, 712 S. Kansas Ave., Topeka, KS 66603, 1-800-723-6953
- Amberwell Atchison, 800 Raven Hill Drive, Atchison, KS 66002: 913-367-2131
- The Guidance Center, 201 Main Street, Atchison, KS 66002; 913-367-1593
- Alliance Against Family Violence Hotline: 913-675-7217
- Atchison Police Department, 515 Kansas Avenue, Atchison, KS 66002: 911 (9-911 on campus phone) or 913-367-4323 for non-Emergency
- Atchison County Attorney Office, 423 North 5th Street, Atchison, KS 66002: 913-360-8200
- Kansas Coalition Against Domestic and Sexual Violence: <http://www.kcsdv.org/find-help/in-kansas/dv-sa-services.html>
- Kansas Crisis Hotline: 1-888-363-2287

National Resources in the United States

- National Domestic Violence Hotline: 1-800-799-7233
- National Sexual Assault Hotline: 1-800-656-4673
- Rape, Abuse and Incest National Network (RAINN): <https://www.rainn.org/>
- US Dept. of Justice Office on Violence Against Women: <https://www.justice.gov/ovw>
- National Coalition Against Domestic Violence: <http://www.ncadv.org/>
- National Sexual Violence Resource Center: <http://www.nsvrc.org/>
- U.S. Citizenship and Immigration Services: <https://www.uscis.gov/>
- Immigration Advocates Network: <https://www.immigrationadvocates.org/>

Accommodations and Protective Measures:

Benedictine-FC will provide written notification to victims about options for, and available assistance in, changing academic, living, transportation, and working situations or protective measures. If victims request these accommodations or protective measures and they are

reasonably available Benedictine-FC is obligated to provide them, regardless of whether the victim chooses to report the crime to campus security or local law enforcement.

Requests of this nature should be made to the Study Abroad Director at +1 913-360-2790, dmusso@benedictine.edu, who will communicate with the Title IX Coordinator, Dr. Sean Mulcahy, at 913-360-7965, smulcahy@benedictine.edu or Title IX Deputy Coordinator, Mr. Eric Burghart, at 913-360-7500, eburghart@benedictine.edu. The Title IX Coordinator or Deputy Coordinator is responsible for deciding what, if any, accommodations, or protective measures will be implemented.

When determining the reasonableness of such a request, the College may consider, among other factors, the following:

- The specific need expressed by the complainant.
- The age of the students involved.
- The severity or pervasiveness of the allegations
- Any continuing effects on the complainant
- Whether the complainant and alleged perpetrator share the same class or job location.
- Whether other judicial measures have been taken to protect the complainant (e.g., civil protection orders).

Benedictine-FC will maintain as confidential any accommodations or protective measures provided a victim to the extent that maintaining confidentiality would not impair Benedictine-FC's ability to provide them. However, there may be times when certain information must be disclosed to a third party in order to implement the accommodation or protective measure. Such decisions will be made by the College in light of the surrounding circumstances, and disclosures of this nature will be limited so that only the information necessary to implement the accommodation or protective measure is provided. In the event it is necessary to disclose information about a victim in order to provide an accommodation or protective order, Benedictine-FC will inform the victim of that necessity prior to the disclosure, including which information will be shared, with whom it will be shared and why.

When determining the reasonableness of such a request, the College may consider, among other factors, the following:

- The specific need expressed by the complainant.
- The age of the students involved.
- The severity or pervasiveness of the allegations
- Any continuing effects on the complainant
- Whether the complainant and alleged perpetrator share the same class or job location.
- Whether other judicial measures have been taken to protect the complainant (e.g., civil protection orders).

The College will maintain as confidential any accommodations or protective measures provided a victim to the extent that maintaining confidentiality would not impair the College's ability to provide them. However, there may be times when certain information must be disclosed to a third party in order to implement the accommodation or protective measure. Such decisions will be made by the College in light of the surrounding circumstances, and disclosures of this nature will be limited so that only the information necessary to implement the accommodation or protective measure is provided. In the event it is necessary to disclose information about a victim in order to provide an accommodation or

protective order, the College will inform the victim of that necessity prior to the disclosure, including which information will be shared, with whom it will be shared and why.

Procedures for Disciplinary Action:

Allegations of domestic violence, dating violence, sexual assault, or stalking will be processed through the College's Title IX Sexual Harassment Policy, or through policies set forth in the Student Handbook, Employee Handbook, or Faculty Handbook as appropriate. For allegations of dating violence, domestic violence, sexual assault, and stalking, it is most likely that the Handbooks would be used, since the Sexual Harassment Policy is not intended to apply to conduct that occurs overseas. The procedures are utilized whenever or wherever a complaint is made, regardless of the status of the complainant and the respondent.

The complaint resolution procedures are invoked once a report is made to one of the following individuals:

Title IX Coordinator
Dr. Sean Mulcahy
Vice Provost and Title IX Coordinator
Student Success Center, Room 101
1020 North 2nd Street
Atchison, KS 66002
(913) 360-7965; eburghart@benedictine.edu

Deputy Title IX Coordinator
Mr. Eric Burghart
Director of Student Conduct
St. John Paul II Student Center, Room 204
Benedictine College 1020 North 2nd Street
Atchison, KS 66002
(913) 360-7500; eburghart@benedictine.edu

An electronic form available at <https://www.benedictine.edu/student-life/health/title-ix/index> can also be used to file a report.

Pursuant to the Title IX Sexual Harassment Policy, once a formal complaint is made, the Title IX Coordinator will provide notice to the parties of the investigation, including a description of the process to be utilized, the identities of the parties, the conduct at issue, and the date and location of the alleged incident.

During the investigation, the complainant and respondent will each have an equal opportunity to describe the situation and present witnesses, including both fact and expert witnesses, and other supporting evidence. The investigator(s) will review the statements and evidence presented and may, depending on the circumstances, interview others with relevant knowledge, review documentary materials, and take any other appropriate action to gather and consider information relevant to the complaint. Prior to the conclusion of the investigation, both parties will be provided an opportunity to review the evidence gathered during the investigation that is directly related to the allegations raised in the formal complaint. Although the length of each investigation may vary depending on the totality of

the circumstances, the College strives to complete each investigation within thirty (30) to forty-five (45) days of the transmittal of notice.

Upon completion of the investigation, both parties will be given a copy of an investigation report and a live hearing will be conducted to make a determination as to whether any allegations in the complaint were found to be substantiated by a preponderance of the evidence. During the hearing, each party's advisor will be permitted to ask the other party and any witnesses all relevant questions and follow-up questions including those bearing on credibility. The decision maker(s) will issue a written determination of responsibility, a statement of any disciplinary sanctions and whether any remedies will be provided to the complainant, and a description of the procedures and permissible grounds for appeal. Although the length of each adjudication by hearing will vary, the College strives to issue the hearing officer's written determination within 14 days.

In lieu of the hearing process, the parties may consent to have a formal complaint resolved by administrative adjudication. The administrative officer will promptly send written notice to the parties notifying the parties of the administrative officer's appointment; setting a deadline for the parties to submit any written response to the investigation report; and setting a date and time for each party to meet with the administrative officer separately. After reviewing the parties' written responses, the administrative officer will meet separately with each party to provide the party with an opportunity make any oral argument or commentary the party wishes to make and for the administrative officer to ask questions concerning the party's written response, the investigative report, and/or the evidence collected during the investigation. After meeting with each party, the administrative officer will objectively reevaluate all relevant evidence. The administrative officer will resolve disputed facts using a preponderance of the evidence (i.e., "more likely than not") standard and reach a determination regarding whether the facts that are supported by a preponderance of the evidence constitute one or more violations of the policy as alleged in the Formal Complaint. Thereafter, the administrative officer will consult with any College official and the Title IX Coordinator, in the manner specified in the Sexual Harassment Policy and will prepare and transmit a written decision in the manner as specified in that Policy which shall serve as a resolution for purposes of informal resolution. Transmittal of the administrative officer's written determination concludes the administrative adjudication, subject to any right of appeal. Although the length of each administrative adjudication will vary depending on the totality of the circumstances, the College strives to issue the administrative officer's written determination within twenty-one (21) days of the transmittal of the initiating written notice.

Both parties have an opportunity to appeal the determination by filing a written appeal with the Vice President of Student Life within seven (7) days of being notified of the outcome of the investigation or, if the other party appeals, within three (3) days of the other party appealing, whichever is later. The non-appealing party will be notified of the appeal and permitted to submit a written statement in response. The Vice President of Student Life will resolve the appeal within twenty-one (21) days of receiving it and may take any and all actions that she determines to be in the interest of a fair and just decision.

At any time after the parties are provided written notice of the Formal Complaint, and before the completion of any appeal, the parties may voluntarily consent, with the Title IX Coordinator's approval, to engage in mediation, facilitated resolution, or other form of dispute resolution the goal of which is to enter into a final resolution resolving the allegations

raised in the Formal Complaint by agreement of the parties. If the parties reach a resolution through the informal resolution process, and the Title IX Coordinator agrees that the resolution is not clearly unreasonable, the Title IX Coordinator will reduce the terms of the agreed resolution to writing and present the resolution to the parties for their written signature. Once both parties and the Title IX Coordinator sign the resolution, the resolution is final, and the allegations addressed by the resolution are considered resolved and will not be subject to further investigation, adjudication, remediation, or discipline by the College. Absent extension by the Title IX Coordinator, any informal resolution process must be completed within twenty-one (21) days.

However, if the alleged violation for sexual misconduct does not meet the new jurisdictional requirements for Title IX, the matter will be referred to the respective college official (Vice President of Student Life, Human Resources Director, or Dean of the College) to address the sexual misconduct allegation in accordance with the applicable Student, Employee, or Faculty Handbook.

Pursuant to the Student Handbook, in particular the Student Community Code's Disciplinary Procedures, there are two general avenues in which an alleged violation of the Student Community Code may proceed.

When, in the opinion of the Director of Student Conduct, a minor violation of the Student Community Code has been alleged, a Residence Director will investigate the allegations, talk with appropriate parties who may have information regarding the matter, review any evidence, make a decision on the matter, and provide an outcome letter to the student. A student may appeal decisions of a Residence Director to the Director of Student Conduct or an appropriate delegate within 24 hours of receiving his/her outcome letter. If an appeal is timely filed, the Director of Student Conduct or delegate will review the appeal, talk with appropriate parties as needed, and make a final decision on the matter. The Director of Student Conduct may take any action he/she deems appropriate in resolving the matter, including altering any sanctions previously imposed. The Director of Student Conduct will document his/her decision and notify the student of it.

When, in the opinion of the Director of Student Conduct, a more serious violation of the Student Community Code has been alleged (typically this involves a situation in which suspension or expulsion may occur), the Director of Student Conduct will choose one of two courses of action depending on situation:

1. Administrative Meeting with the Director of Student Conduct or an appropriate delegate.
 1. When an Administrative Meeting occurs, the student will meet with the Director of Student Conduct or appropriate delegate. The student will be given an opportunity to provide a statement and answer any questions. If a violation is determined to have occurred, the student will be so notified via an outcome letter and informed of the sanctions imposed. Decisions resulting from an Administrative Meeting may be appealed to the Vice President of Student Life in accordance with the procedures outlined below.
2. Refer the matter to the Student Conduct Board for a hearing.
 1. Student Conduct Board hearings will be conducted in the manner described below. Decisions resulting from a Student Conduct Board hearing may be

appealed to the Vice President of Student Life in accordance with the procedures outlined below.

The Board will conduct an inquiry into the matter and determine disciplinary sanctions as it deems appropriate. The student will receive a notice of charges and be given an opportunity to present information and evidence on the matter in question to the board. The student or the Director of Student Conduct, or appropriate delegate, may appeal decisions of the Student Conduct Board to the Vice President of Student Life.

Any party may appeal decisions of an Administrative Meeting or Student Conduct Board Hearing to the Vice President of Student Life.

1. An accused student or a complainant may request an appeal by notifying the Vice President of Student Life and following the procedures noted below.
 1. Within three (3) days of receiving the outcome letter, filing an "Intent to Appeal" form in the Student Life Office, 204 Student Union.
 2. Within 72 hours of receiving the outcome letter, delivering a written appeal of the disciplinary decision to the Student Life Office.
 3. The appeal needs to be based on one of the four grounds provided for appeals.
2. The Vice President of Student Life shall determine whether the matter is appropriate for appeal based on the written rationale and documentation provided by the student in the appeal request. The appeal is not a rehearing, so the student is advised to thoroughly present his/her rationale for why he/she believes the original disciplinary decision needs to be changed. The purpose of an appellate hearing is to consider an appeal, not to re-hear a case, i.e., the basis for the appeal must fall within one or more of the aforementioned guidelines. Disagreement with the result of the hearing or any sanctions levied does not itself constitute the basis for an appeal.
3. Except when testimony or written statements shall be required for the presentation of new evidence, an appeal shall be limited to review of record of the initial hearing and supporting documents.
4. If an appeal is granted, the Vice President of Student Life may:
 1. Overturn all or any part of the original decision and issue a new decision.
 2. Remand the matter to the original judicial body for reopening of the hearing to allow reconsideration of the original determination and/or sanction(s).
5. In cases involving appeals requested by students accused of violating the Student Community Code, review of the sanction(s) by the Vice President of Student Life may not result in more severe sanction(s) for the accused student. Instead, following an appeal, the Vice President of Student Life may, upon review of the case, reduce, but not increase, the sanctions imposed following the original disciplinary hearing.
6. In cases involving appeals requested by persons other than students accused of violating the Student Community Code, the Vice President of Student Life may, upon review of the case, reduce or increase the sanctions imposed following the original disciplinary hearing or remand the case to the original judicial body.
7. In cases involving suspension and expulsion, a final appeal may always be made to the President of the college.
8. Nothing in this appeals process shall interfere with the right of the President of the College to make a final determination on any disciplinary matter.

Pursuant to the Faculty Handbook, serious discipline or termination will not be initiated until after the faculty member and appropriate administrators have attempted to resolve the dispute

by mutual agreement. The termination of a contract before the end of a specified term, the failure to renew a contract with a tenured faculty member, or serious discipline of a faculty member shall not occur without adequate cause. Adequate cause includes serious violation of policies and procedures of the College such as those governing sexual harassment.

Serious discipline may involve a reduction in salary, relief from duties without pay, demotion in rank, or other action seriously impacting the economic security or status of a faculty member where such action is for disciplinary reasons as opposed to unsatisfactory performance.

Ordinarily, the College's procedures governing serious discipline/termination will be promptly initiated once there has been an allegation of dating violence, domestic violence, sexual assault, or stalking. In the event the President determines that serious, immediate harm would come otherwise to the faculty member, to students, to other individuals, or the College, the President may impose an immediate, interim suspension of the faculty member that shall take effect prior to completion of the College's procedures governing serious discipline/termination. Notice of such immediate, interim suspension together with a specific statement of the reasons for such action shall be promptly provided to the faculty member affected thereby. The immediate, interim suspension may be lifted at the discretion of the President prior to completion of the College's procedures governing serious discipline/termination but otherwise shall remain in effect unless and until the College's procedures governing serious discipline/termination result in a finding in favor of the faculty member.

Except in cases of financial exigency or removal of the subjects taught by the faculty member from the offerings of the College, any matter involving termination of a contract before the end of a specified term, failure to renew a contract, and serious discipline for adequate cause will be preceded by a written notice including a statement of reasons approved by the President, and the individual concerned will have the right to be heard by a hearing committee of his or her peers. The faculty member shall request a hearing within ten (10) calendar days from the date of the notice. The termination or serious discipline, other than immediate suspension, will not become effective until after the ten-day period to request a hearing has expired or the hearing and appeals procedures have been exhausted, whichever is earlier. Should the hearing and appeals process find for the faculty member, any pay that was withheld as the result of immediate suspension will be reinstated retroactive to the initial date of the suspension.

The hearing committee will consist of the Dean of the College (who will serve as Chair), two tenured faculty members recommended by the faculty member, and two tenured faculty members appointed by the Dean of the College. In the event the Dean of the College is unable to serve, the President may appoint another member of the administration to serve in the Dean's stead. A member of the committee may remove himself or herself from the case if he or she wishes to be disqualified by bias or interest. Each party will have a maximum of two challenges to the committee membership without stated cause except that the seat filled by the Dean of the College (and/or another member of the administration in the event the Dean is unable to serve) is not subject to challenge.

The hearing shall be held no sooner than twenty (20) calendar days after the faculty member receives the written notice specifying the statement of reasons for imposition of termination/serious discipline.

During the hearing, the faculty member will be permitted to have an academic advisor or counsel of the faculty member's own choice. In the event the faculty member chooses to have legal counsel, the faculty member has sole responsibility for compensating such counsel.

An audio record of the hearing will be made, and, upon request, a copy will be available to the faculty member without cost.

The burden of proof that adequate cause exists rests with the College and shall be satisfied only by clear and convincing evidence in the record considered as a whole, except to the extent applicable law requires the use of a different standard (i.e., such as preponderance of the evidence in cases involving sexual harassment).

The hearing committee may grant adjournment to enable either party to investigate evidence as to which a valid claim of surprise is made.

The faculty member will be afforded an opportunity to obtain necessary witnesses and documentary or other evidence, and the administration of the College will, insofar as it is possible for it to do so, secure the cooperation of such witnesses and make available necessary documents and other evidence within its control.

The faculty member and the administration and their representatives will have the right to confront and cross-examine all witnesses. Where the witnesses cannot or will not appear, but the hearing committee determines that the interest of justice require admission of their statements, the hearing committee will identify the witnesses, disclose their statements, and if possible, provide for interrogatories.

In the hearing of charges of incompetence, the testimony must include that of qualified faculty members from this or other institutions of higher education.

The hearing committee will not be bound by strict rules of legal evidence and may admit any evidence which is of probative value in determining the issues involved.

The hearing committee may promulgate procedures to govern the conduct of the hearing and submission of evidence and argument.

At the conclusion of the hearing process, the hearing committee shall issue to the faculty member and President a written report that includes findings of fact and a determination as to whether or not adequate cause exists for the termination/serious discipline imposed. The hearing committee's findings of fact and determination shall be based solely on the evidence and arguments submitted by the parties during the hearing process.

If the hearing committee's report concludes that adequate cause for termination/serious discipline does not exist, the President may, within ten (10) calendar days of the date of the hearing committee's report, serve on the faculty member a notice of rejection stating the reasons for the President's rejection of the hearing panel's determination. The faculty member shall have the right to appeal the President's rejection of the hearing committee's decision to the Board of Directors, as outlined in Number 14.

Except for such simple announcements as may be required, e.g., covering the time of the hearing and similar matters, public statements, and publicity about the case by either the faculty member or administrative officers will be avoided so far as possible until the proceedings have been completed, including consideration by the Academic Affairs

Committee of the Board of Directors.

If the hearing committee determines that adequate cause for serious discipline/termination exists, or if the President rejects the hearing committee's determination that adequate cause for serious discipline/termination does not exist, the faculty member may appeal the determination or rejection to the Academic Affairs Committee of the College's Board of Directors. The faculty member must give notice of his/her intent to appeal no later than ten (10) calendar days after the determination or rejection is filed. Such notice shall be provided to the President, in writing, and shall state with specificity the grounds upon which the faculty member is appealing. Upon receipt of the notice, the President shall cause the notice of appeal and the record of evidence and arguments from the hearing to be provided to the faculty member and transmitted to the Chair of the Academic Affairs Committee of the Board. The hearing record includes all the evidence introduced at the hearing as well as an audio recording or transcript of the hearing itself, together with the hearing panel's findings." The Academic Affairs Committee shall review the hearing record of the case and reach a recommendation as to whether to affirm the hearing committee's determination, or the President's rejection as the case may be, reverse the same, or modify the same. The Chair of the Board may participate in the Academic Affairs Committee's deliberations but shall not have voting rights. The Academic Affairs Committee's review shall be confined to the hearing record. The Academic Affairs Committee will apply a clear error standard of review to the hearing panel's findings of fact and a de novo standard of review to the hearing panel's interpretation and construction of applicable policies, rules, regulations, and standards. In conducting its review, the Academic Affairs Committee may invite the faculty member and President to present oral argument or further written statements, but whether and to what extent such argument and statements will be permitted is solely within the discretion of the Academic Affairs Committee. In the event the Academic Affairs Committee permits oral argument or further written statements, both the faculty member and the President shall have an equal right to appear or submit statements, as the case may be. While the review of a hearing committee's determination is pending, the President and faculty member are prohibited from engaging in any ex parte communications with the Academic Affairs Committee, the Board President, and/or the Class A and B Board Members to the extent such communications relate to the subject matter of the serious discipline/termination or the hearing committee's determination."

At the conclusion of its review, the Academic Affairs Committee shall forward its recommendation to the Class A and Class B members of the Board of Directors, along with the hearing record and a record of any additional oral argument or written submissions that Academic Affairs Committee received from the parties. The Class A and Class B members of the Board of Directors will review the recommendation and vote to affirm the hearing committee's determination, or the President's rejection as the case may be, reverse the same, or modify the same. In the event that a majority of the total number of Class A and Class B members of the Board of Directors cannot agree, the recommendation of the Academic Affairs Committee shall stand as the resolution of the appeal. After receiving the decision from the Class A and Class B members of the Board of Directors, the Chair of the Academic Affairs Committee shall issue and serve on the faculty member and President a written statement setting forth the determination of the appeal. The Class A and Class B members of the Board of Directors' determination shall be subject to further review only as permitted by the Alternative Dispute Resolution section of the Faculty Handbook.

Pursuant to the Employee Handbook, employees are expected to comply with all established Benedictine College rules, standards, policies, and procedures. Whenever possible, the College attempts to counsel employees and work toward identification and correction of performance issues.

Ordinarily, the Corrective Counseling process described below will be followed and documented to the employee's personnel file. However, the College reserves the right to skip or repeat any step(s) depending on the circumstances of the situation. At the discretion of Cabinet members, some situations are deemed so egregious or such a serious violation of policies and/or expected conduct that immediate suspension or separation of service will be deemed necessary.

Corrective Counseling Process

1. Ongoing: Informal coaching with or without a written record to personnel file.
2. Corrective Counseling with Verbal Warning: With or without written record to personnel file.
3. Corrective Counseling with Written Warning: With written record to personnel file and a Performance Improvement Plan prepared and signed and dated by the supervisor and employee.
4. Critical Counseling with Final Written Warning: With written record to personnel file, and may or may not include disciplinary action or sanctions.
5. Disciplinary Action: Up to and including demotion, suspension, reassignment, or separation of service.
6. Corrective counseling may occur for misconduct, performance problems, and/or performance deficiencies. The receipt of a rating of needs improvement or unacceptable in a periodic performance evaluation will be deemed equivalent to the employee being placed on a step of corrective counseling. The appropriate level of formal corrective counseling will be noted in the performance evaluation. Communications issued to the employee to address performance deficiencies identified between evaluations will also indicate the appropriate level of corrective counseling. If the employee does not improve performance, the employee may advance through the steps of corrective counseling including the possibility of separation of service prior to the issuance of the next performance evaluation. Any combination of performance or misconduct related counseling sessions may also result in separation of service.

Sexual or other forms of harassment, including dating violence, domestic violence, sexual assault, and stalking, are examples of grounds for possible suspension or immediate dismissal of an employee without warning.

Rights of the Parties in an Institutional Proceeding:

During the course of the process described in the previous section, both the accuser and the individual accused of the offense are entitled to:

1. A prompt, fair and impartial process from the initial investigation to the final result.
 - A prompt, fair and impartial process is one that is:
 - Completed within reasonably prompt timeframes designated by the institution's policy, including a process that allows for the extension of

timeframes for good cause, with written notice to the accuser and the accused of the delay and the reason for the delay.

- Conducted in a manner that:
 - Is consistent with the institution's policies and transparent to the accuser and the accused.
 - Includes timely notice of meetings at which the accuser or accused, or both, may be present; and
 - Provides timely access to the accuser, the accused and appropriate officials to any information that will be used during the informal and formal disciplinary meetings and hearings.
 - Conducted by officials who do not have a conflict of interest or bias for or against the accuser or the accused.
2. Proceedings conducted by officials who, at a minimum, receive annual training on the issues related to dating violence, domestic violence, sexual assault, and stalking and on how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability.
 - Such training addresses topics such as the definition of sexual harassment; the scope of the University's education programs and activities; how to conduct investigations, hearings, and appeals and informal resolutions (as applicable); relevant evidence and how it should be used during a proceeding; proper techniques for questioning witnesses; basic procedural rules for conducting a proceeding; and avoiding actual and perceived conflicts of interest. Training is received through workshops and webinars from various sources (i.e., ATIXA, KICA, NASPA, Husch Blackwell, and Heartland Campus Safety Summit).
 3. The same opportunities to have others present during any institutional disciplinary proceeding, including the opportunity to be accompanied to any related meeting or proceeding by the advisor of their choice. The institution may not limit the choice of advisor but may establish limits regarding the extent to which that advisor may participate in the proceeding, as long as those limits apply equally to both parties.
 4. Have the outcome determined using the preponderance of the evidence standard.
 5. Simultaneous, written notification of the results of the proceeding, any procedures for either party to appeal the result, any change to the result, and when the result becomes final. For this purpose, "result" means "any initial, interim and final decision by an official or entity authorized to resolve disciplinary matters" and must include the rationale for reaching the result and any sanctions imposed.

Possible Sanctions or Protective Measures that the College May Impose for Dating Violence, Domestic Violence, Sexual Assault or Stalking Offenses:

Following a final determination in the institution's disciplinary proceeding that domestic violence, dating violence, sexual assault, or stalking has been committed, the institution may impose a sanction depending on the mitigating and aggravating circumstances involved. The possible sanctions for a student include verbal reprimand; written reprimand; mandatory training, coaching, or counseling; mandatory monitoring; partial or full probation; partial or full suspension; fines; permanent separation from the institution (i.e., termination or dismissal); physical restriction from college property; cancellation of contracts; and any

combination of the same. In addition to the above sanctions, an employee may be permanently terminated or suspended for any length of time determined appropriate by the Director of Human Resources. Following a suspension, the individual will be required to meet with the Vice President of Student Life (student) to determine reentry status on a case-by-case basis or Director of Human Resources (employee) to discuss re-entry and expectations going forward.

In addition, Benedictine- FC can make available to the victim a range of protective measures. They include forbidding the accused from entering the victim's residence hall and from communicating with the victim, other institutional no-contact orders, security escorts, modifications to academic requirements or class schedules, changes in working situations, etc.

Publicly Available Recordkeeping:

The College will complete any publicly available recordkeeping, including Clery Act reporting and disclosures, without the inclusion of personally identifiable information about victims of dating violence, domestic violence, sexual assault, and stalking who make reports of such to the College to the extent permitted by law.

Victims to Receive Written Notification of Rights:

When a student or employee reports to the College that he or she has been a victim of dating violence, domestic violence, sexual assault, or stalking, whether the offense occurred on or off campus, the College will provide the student or employee a written explanation of his or her rights and options as described in the paragraphs above.

Sex Offender Registration Program:

The Campus Sex Crimes Prevention Act of 2000 requires institutions of higher education to advise members of the campus community where they can obtain information provided by the state concerning registered sex offenders. It also requires sex offenders to notify the state of each institution of higher education in the state at which they are employed or enrolled or carrying on a vocation. The state is then required to notify the College of any such information it receives. Anyone interested in determining whether such persons are on this campus may do so by contacting the Program Director at Program Director. Italy has no sex offender registries that are accessible to the public.

Timely Warnings and Emergency Response

Timely Warnings

In the event of criminal activity occurring either on campus or off campus that in the judgment of the Dean of the College, Study Abroad Director or Program Director/Faculty Leader constitutes a serious or continuing threat to members of the campus community, a campus-wide "timely warning" will be issued. Examples of such situations may include a sexual assault or a series of motor vehicle thefts in the area that merit a warning because they present a continuing threat to the campus community. Warnings will be communicated to students and employees via one or more of the methods discussed later in this section. Updates to the warnings will be provided as appropriate.

Anyone with information warranting a timely warning should immediately report the circumstances to:

- Program Director/Faculty Leader, +39-345-241-1244
- Study Abroad Director, +39 347-190-7603

The College has communicated with local law enforcement asking them to notify the College if it receives reports or information warranting a timely warning.

Emergency Response

The College has an emergency management plan designed to ensure there is a timely and effective response in the event of a significant emergency or dangerous situation occurring on campus involving an immediate threat to the health or safety of members of the campus community. Such situations include, but are not limited to: tornadoes, bomb threats, chemical spills, disease outbreaks, fires, active shooters, etc. The College has communicated with local police requesting their cooperation in informing the College about situations reported to them that may warrant an emergency response.

Students, staff and visitors are encouraged to notify the Study Abroad Director at Study Abroad Director, Daniel Musso at 913-360-7975 of any emergency or potentially dangerous situations.

The Program Director/Faculty Leader will access available sources of information from Benedictine-FC staff and local authorities to confirm the existence of the danger and will be responsible for initiating the institution's response and for marshaling the appropriate local emergency response authorities for assistance. Depending on the nature of the emergency, other College departments may be involved in the confirmation process.

Once the emergency is confirmed and based on its nature, the Study Abroad Director, or his designee, will consult with other appropriate College officials to determine the appropriate segment or segments of the College community to be notified.

The Study Abroad Director and the Program Director/Faculty Leader, along with other appropriate personnel, will determine who should be notified, and will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to or otherwise mitigate the emergency.

Depending on the segments of the campus the notification will target, the content of the notification may differ. When appropriate, the content of the notification will be determined in consultation with local authorities. Also, as appropriate, the notification will give guidance as to whether its recipients should shelter in place or evacuate their location.

The Study Abroad Director or his designee will direct the issuance of emergency notifications, which will be accomplished using one or more of methods discussed later in this section, depending on the nature of the threat and the segment of the campus community being threatened.

At the direction of the Study Abroad Director, the Program Director/Faculty Leader will notify local law enforcement of the emergency if they are not already aware of it and local media outlets in order that the larger community outside the campus will be aware of the emergency.

Methods for Issuing Timely Warnings and Emergency Notifications

The method(s) listed below may be utilized when the College issues a timely warning or emergency notification to the campus community.

Method	Sign Up Instructions
Sending a system wide e-mail	Automatically, upon approval of student's study abroad participation
Posting Notices in Common Areas	No sign up required
Holding a mandatory meeting with the Program Director/Faculty Leader	No sign up required
Study Abroad Communication Tree	Set up individually for each study abroad group, by semester

Testing & Documentation

Benedictine-FC plans tests of its emergency response and evacuation procedures at least once a year. The tests may be announced or unannounced. Also, at various times the Study Abroad Director will meet to train and test and evaluate Benedictine-FC's emergency response plan.

The Study Abroad Director maintains a record of these tests and training exercises, including a description of them, the dates and times they were held and an indication of whether they were announced or unannounced. In connection with at least one such test, the College will distribute to its students and employees information to remind them of the College's emergency response and evacuation procedures.

Missing Student Policy

If a member of the Benedictine- FC community has reason to believe that a student who resides in on-campus housing is missing, that information should be reported immediately to one of the following designated campus security authorities:

1. Daniel Musso, Study Abroad Director: Cell phone in Italy: +39 347-190-7603 or US cell phone +1 913-360-2790.
2. Program Program/Faculty Leader (faculty specific to each semester): +39-345-241-1244
3. Pietro Grillo, Residence Director: +39 346-416-3349

Any College employee receiving a missing student report must immediately refer it to the local police.

When a student is reported missing, the Program Director/Faculty Leader in coordination with the Study Abroad Director will initiate an investigation into the welfare of the student if

Note that a student may also be a “missing person” at any time prior to the expiration of 24 hours the person’s absence is contrary to his/her usual pattern of behavior and unusual circumstances may have caused the absence. Such circumstances could include, but not be limited to, a report or suspicion that the missing person may be the victim of foul play, has expressed suicidal thoughts, is in a life-threatening situation, or has been with persons who may endanger the student’s welfare.

To register this information, students can complete the online screen during the registration process or go to emergency contact information registration on the College website and follow the directions indicated. This information will remain in effect until changed or revoked by the student, will be kept confidential, will be accessible only to authorized campus officials, and may not be disclosed except to law enforcement personnel in furtherance of a missing person investigation.

Crime Statistics

[illegible]

Crime	On Campus			On Campus Housing			Non Campus			Public Property		
	2023	2022	2021	2023	2022	2021	2023	2022	2021	2023	2022	2021
Manslaughter by Negligence	0	0	0	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0
Arrest - Liquor Law Violation	0	0	0	0	0	0	0	0	0	0	0	0
Arrest - Drug Abuse Violation	0	0	0	0	0	0	0	0	0	0	0	0
Arrest - Weapon Violation	0	0	0	0	0	0	0	0	0	0	0	0
Disciplinary Referral - Liquor Law Violation	0	0	0	0	0	0	0	0	0	0	0	0
Disciplinary Referral - Drug Abuse Violation	0	0	0	0	0	0	0	0	0	0	0	0
Disciplinary Referral - Weapon Violation	0	0	0	0	0	0	0	0	0	0	0	0
Domestic Violence	0	0	0	0	0	0	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0	0	0	0	0	0	0
Stalking	0	0	0	0	0	0	0	0	0	0	0	0

Hate crimes:

2023: No hate crimes reported.

2022: No hate crimes reported.

2021: No hate crimes reported.

Crimes unfounded by the College:

2023: 0 unfounded crimes.

2022: 0 unfounded crimes.

2021: 0 unfounded crimes.

Statistics for unfounded crimes provided by law enforcement agencies:

2023: 0 unfounded crimes.

2022: 0 unfounded crimes.

2021: 0 unfounded crimes.

The data above reflects statistics provided from law enforcement agencies related to crimes that occurred on the University's Clery Geography.

Annual Fire Safety Report

Housing Facilities and Fire Safety Systems

The College maintains on-campus housing for its students. Below is a description of fire safety systems and the number of fire drills conducted during the previous calendar year.

Campus: Benedictine College - Florence, Italy, Florence, Italy, IC

Facility	Fire Alarm Monitoring Done on Site	Partial Sprinkler System	Full Sprinkler System	Smoke Detection	Fire Extinguishers	Evacuation Plans & Placards	Number of evacuation (fire) drills in previous calendar year
Villa Morghen, Via Feliceto 8 50135 Settignano, FLORENCE	X			X	X	X	1

Policies on Portable Appliances, Smoking and Open Flames

The use of open flames, such as candles, and the burning of such things as incense, and smoking are prohibited in campus housing. No portable electrical appliances are permitted in student bedrooms. In addition, tampering with fire safety systems is prohibited and any such tampering may lead to appropriate disciplinary action.

Benedictine-FC reserves the right to make periodic inspections of campus housing to ensure fire safety systems are operational and that the policy on prohibited items is being complied with. Prohibited items, if found, will be confiscated and donated or discarded without reimbursement.

Fire Evacuation Procedures

In the event of a fire, Benedictine-FC expects that all campus community members will evacuate by the nearest exit, closing doors and activating the fire alarm system (if one is nearby) as they leave. If circumstances permit at the time of the alarm, additional instructions will be given regarding where students and/or staff are to relocate.

Fire Education and Training Programs

Fire safety education programs for all residents of on-campus student housing and all employees with responsibilities related to that housing are held at the beginning of each semester. Their purpose is to: familiarize everyone with the fire safety system, train them on

procedures to follow if there is a fire and inform them of Benedictine-FC's fire safety policies. Information distributed includes maps of the facility's evacuation route and any fire alarms and fire suppression equipment available in the facility.

Reporting Fires

The College is required to disclose each year statistical data on all fires that occurred in on-campus student housing. When a fire alarm is pulled and/or the fire department responds to a fire, these incidents are captured. If you encounter a fire that presents an emergency situation, ensure your own safety and then please call 113.

There may also be instances when a fire is extinguished quickly, and an alarm is not pulled or a response by the fire department was not necessary. It is important that these incidents be recorded as well. Therefore, if you are aware of such a fire, see evidence of one or hear about one, you should contact the Daniel Musso, Study Abroad Director at Daniel Musso, Study Abroad Director at 913-360-7975. When providing notification of a fire, give as much information as possible about the location, date, time and cause of the fire.

Plans for Future Improvements

The College periodically reviews its fire safety protections and procedures. At this time, it has no plans for future improvements.

Fire Statistics

Benedictine College - Florence, Italy

2023

No fires were reported in 2023.

2022

No fires were reported in 2022.

2021

No fires were reported in 2021.