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PREPARATION OF THE ANNUAL SECURITY REPORT AND DISCLOSURE OF CRIME STATISTICS

The Grand Canyon University Public Safety Department publishes this report to inform the Grand Canyon University community about campus security policies, initiatives to prevent and respond to crime and emergencies, and the occurrence of crime on campus. This report complies with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act and uses information maintained by the Grand Canyon University Public Safety Department and information provided by other University offices such as Student Affairs, Residence Life, Office of Student Conduct, Title IX as well as information provided by Campus Security Authorities, and local law enforcement agencies surrounding the Grand Canyon University campus. Each of these entities provides updated policy information and/or crime data.

This report provides statistics for the previous three years concerning reported crimes that occurred on campus, in certain off-campus buildings and property owned, leased, or controlled by Grand Canyon University. This report also includes institutional policies concerning campus security, sexual assault, alcohol, and other drugs.

The University distributes a notice of the availability of this Annual Security Report and Fire Safety Report by October 1 of each year to every member of the University community. The Annual Fire Safety Report may be accessed on the Consumer Information page of the Grand Canyon University internet site at https://www.gcu.edu/academics/academic-policies.php#h-consumer-information Anyone, including prospective students and employees, may obtain a paper copy of this report by visiting the Public Safety Department in the Grove Garage Building 80 on main campus.

Daily Crime and Fire Logs

The Public Safety Department maintains a Daily Crime and Fire Log of all criminal and fire incidents reported. This log is updated and published within 48 business hours. Anyone may view the log during normal business hours by visiting the Public Safety Department lobby located in the Grove Garage Building 80. This log identifies all campus crimes and on-campus student housing fires by including the date and time of occurrence, date and time the incident was reported and general location and disposition of each criminal incident reported to a Campus Safety Authority (CSA). Upon request, a paper copy of any maintained Daily Crime Log will be made available, within forty-eight hours of notice.

ABOUT THE PUBLIC SAFETY DEPARTMENT AND GRAND CANYON UNIVERSITY POLICE

Role, Authority, and Training

The Grand Canyon University Public Safety Department consists of one Director who oversees, over 20 sworn Police Officers, 140 full time security personnel, 40 part time event security personnel, and 60 student workers who provide service 24 hours a day, 365 days a year. Grand Canyon University is the first, and currently only, private university in Arizona to invest in its own fully sworn and state certified police department.

Grand Canyon University Police Officers:

- Are sworn, full-authority peace officers with powers of arrest as defined in A.R.S. 41-1822;
- Meet all Arizona Peace Officer Standards and Training Board (AZPOST) qualifications;
- Complete at minimum 585 hours of full-authority peace officer basic training;
- Complete a minimum of 8 hours of continuing training annually and 8 hours of proficiency training every 3 years;
- Investigate criminal matters that occurred or are occurring on any Grand Canyon University owned or controlled property;
- Receive yearly in-service training each year specializing in crime prevention, emergency first aid, CPR/AED, weapons, and tactics;
- Maintain firearms proficiency and qualify annually using a service handgun and ammunition, and an AZPOST Board-prescribed target identification and judgment course.

Security Personnel:

- Meet all requirements defined in A.R.S. 32-2402 for security guard certification;
- Complete a minimum of 40 hours of pre-assignment training and 8 hours of annual continuing training;
- Armed security personnel receive 16 hours of initial firearms training and 8 hours of continuing annual firearms training;
- Receive CPR, First Aid and AED training;
- Have the authority to make a citizen’s arrest for crimes occurring in their presence.
Working Relationship with Local, State, and Federal Law Enforcement Agencies

The Grand Canyon University Public Safety Department maintains a cooperative relationship with the Phoenix Police and Fire Departments, Arizona Department of Public Safety, Arizona Peace Officer Standards and Training Board, Maricopa County Sheriff’s Office, FBI, and other surrounding first responder agencies. Since 2012, Grand Canyon University has entered into a written agreement with the Phoenix Police Department. The Grand Canyon University Neighborhood Safety Initiative includes a generous $100,000 annual donation to allow Phoenix Police Officers and Sergeants to conduct additional enforcement efforts and crime suppression programs in the neighborhood surrounding our main campus. The Grand Canyon University Police Department has also entered into a Memorandum of Understanding with the Phoenix Police Department that coordinates and defines criminal matters that each agency will investigate. Grand Canyon University Police investigate misdemeanor and certain lower class felony crimes occurring on campus or GCU owned properties. The Phoenix Police Department investigates all crimes surrounding GCU property and higher class felony crimes that occur on campus.

Emergency response training drills are conducted on campus throughout the year to simulate and coordinate joint responses by Grand Canyon University Police, Campus Safety, Phoenix Police and Phoenix Fire Department.

The Phoenix Fire Department conducts regular training on and around campus. Joint training between Grand Canyon Public Safety and Phoenix Fire Department personnel is conducted during routine fire/evacuation drills in residence halls. Members of Public Safety, Residence Life and Facilities Management host meetings with the Phoenix Fire Department to streamline emergency response procedures.

Grand Canyon University Public Safety Department personnel have benefitted from Active Shooter Threat Training and Tactical Medical Training provided by the Federal Bureau of Investigation and the Federal Law Enforcement Training Center (FLETC). FBI training consists of two 8 hour sessions. FLETC training consists of 40 total hours during the course of one week. Both are designed to equip Public Safety personnel with the knowledge and skills required to successfully end an active threat incident and treat life threatening injuries.

Crimes Involving Student Organizations at Off-Campus Locations

There are no Grand Canyon University recognized student organizations located off-campus. All student organizations recognized by the University are located on-campus.

REPORTING CRIMES AND OTHER EMERGENCIES

The University has a number of ways for campus community members and visitors to report crimes, serious incidents, and other emergencies to law enforcement and to appropriate University officials. Regardless of how and where it is decided to report these incidents, it is critical for the safety of the entire Grand Canyon University community that the crime is immediately and accurately reported. When the victim of a crime elects to make a report, the Public Safety Department will investigate the situation and determine if follow-up actions are required, including issuing a Timely Warning, Emergency Notification or contacting the Phoenix Police Department.

Voluntary, Confidential Reporting

If crimes are never reported, little can be done to help members of the community from being victims. We encourage University community members to report crimes accurately and promptly, participate in and support crime prevention efforts and report crimes when the victim is unable to make the report. The University is much safer when all community members participate in safety and security initiatives.

The victim of a crime, or someone wanting to report a crime but not wanting to pursue action within the University or criminal justice system may file a voluntary, confidential report by either calling the Public Safety Department and asking to remain anonymous or using the online TIPS reporting tool. The TIPS reporting tool can be found on the Public Safety page of the gcu.edu website. Parents, students, faculty and staff may use this system to report a range of incidents such as: bullying, vandalism, suspicious activity, academic cheating, possession of an illegal substance, or sexual assault cases. The appropriate university department will investigate all reports. Depending upon the circumstances of the crime being reported, victims and witnesses may be able file a report while maintaining confidentiality. The purpose of a confidential report is to comply with a person’s wish to keep their personally identifying information confidential, while taking steps to ensure their safety and the safety of others. The confidential reports allow the University to compile accurate records on the number and types of incidents occurring on campus. Reports filed in this manner are counted and disclosed in the Annual Security Report. Confidential reports may also be analyzed to determine if a Timely
Warning to the GCU community is necessary. In limited circumstances, the department may not be able to assure confidentiality and will inform the reporting person in those cases.

Anyone may call the Public Safety Department at 602-639-8100 to report crimes, suspicious persons/activity or a need for assistance of any kind. Callers may remain anonymous.

**Reporting to Police and Public Safety**

We encourage all members of the University community to report all crimes and other emergencies to the Public Safety Department in a timely manner. The Public Safety Department is available by phone 24 hours a day at 602-639-8100 or in person between the hours of 8:00 am – 5:00 pm in the Grove Garage Building 80. Although many resources are available, the Public Safety Department should be notified of any crime, whether or not an investigation ensues, to assure the University can assess any and all security concerns and inform the campus community of potential threats against which they can take preventive measures. Members of the community may also report crimes to the Phoenix Police Department by dialing 911 from a cellular phone or 602-262-6151 for non-emergencies.

**Emergency Phones**

The University has installed Emergency Blue Light Phones throughout campus and on every floor of every parking garage. Emergency call stations are also installed in all student housing halls and stairwells. Public Safety dispatchers continuously monitor all emergency phones and elevator emergency telephones 24 hours a day. Each phone is a direct-dial, one button push-to-talk system. When activated, the “blue light” phones also display a flashing light. Public Safety employees respond to all activations of phones in this system without exception. Emergency Blue Light phones should be used to report safety concerns such as suspicious incidents, persons or emergency situations only.

**Reporting to Other Campus Security Authorities (CSA)**

While the University encourages all campus community members to promptly report all crimes and other emergencies directly to Public Safety at 602-639-8100 or 911, we also recognize that some may prefer to report to other individuals or University offices. The Clery Act recognizes certain University officials and offices as “Campus Security Authorities (CSA).” The act defines these individuals as, “Officials of an institution who has significant responsibility for student and campus activities, including, but not limited to, student housing, student discipline, and campus judicial proceedings. An official is defined as any person who has the authority and the duty to take action or respond to particular issues on behalf of the institution.”

While the University has identified a number of CSA’s at the University, we officially designate the following offices as places where campus community members should report crimes:

**Official Campus Location and Phone Number**

- **Department of Public Safety**
  The Grove Garage, Building 80
  602-639-8100

- **For Title IX concerns:**
  Shanna Milonas, MBA
  Assistant Vice President of Academic Compliance Title IX & Section 504 Coordinator
  Building 23
  602-639-5900
  titleix@gcu.edu

- **For students:**
  Tim Griffin
  Dean of Students
  Building 26
  602-639-6647

- **For faculty and staff:**
  Patti Stoner
  Director of Human Resources
  Building 71
  602-639-6744

- **For athletics:**
  Jamie Boggs
  Director of Athletics
  Building 26
  602-639-6611

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Pastoral and Professional Counselors

According to the Clery Act, pastoral and professional counselors who are appropriately credentialed and hired by Grand Canyon University in a counseling role are not considered Campus Security Authorities when they are acting in their role as a counselor. As a matter of policy, the University encourages pastoral and professional counselors to notify those whom they are counseling of the voluntary, confidential reporting options available to them.

Fire Incident Reporting

Students, faculty and staff are instructed to call 911 to report a fire emergency. Non-emergency notifications (e.g., evidence that something burned) are made to:

Police and Public Safety Department: 602-639-8100

TIMELY WARNING REPORTS

The University will issue a Timely Warning to the University community when a Clery reportable crime occurs on campus or near the University population when the Director of Public Safety (or designee) determines that the situation represents a serious or continuing threat to the campus community. The decision to issue a Timely Warning will be made on a case-by-case basis. Persons authorized to initiate and send Timely Warnings will do so in a timely manner. The persons authorized to send Timely Warning Notifications are also authorized to send Emergency Notifications.

In the Director of Public Safety’s absence, any on-duty member of the Public Safety Department Management or Command Staff Team may issue a Timely Warning or Emergency Notification. Content included in the Timely Warning or Emergency Notification will be crafted by the issuing person. All members of the Public Safety Department Command Staff and Management Teams have access to, and permission to use the emergency notifications systems to send the information themselves. They may also direct any Public Safety Dispatcher to send the warning or notification for them.

The level of detail included in a Timely Warning will vary depending on the type of crime. The name(s) of a victim(s) will not be published in the Timely Warning. Information that might identify the victim will also be excluded, where possible. Timely Warnings may be distributed a number of ways, including but not limited to flyers, posters, emails and other media outlets.

The purpose of a Timely Warning is to notify the campus community of the incident and to provide information that may enable the community to take steps to protect themselves from similar incidents. The University will issue Timely Warnings whenever the following criteria are met: (1) a crime is reported; (2) the perpetrator has not been apprehended; and (3) there is a substantial risk to the safety of other members of the campus community because of this crime.

Additionally, the Police and Public Safety Department may, in some circumstances, issue Timely Warnings when there is a pattern of crimes against persons or property. The Director of Public Safety or designee, in consultation with other University offices, will make the determination if a Timely Warning is required. For incidents involving off-campus crimes, the University may issue a Timely Warning if the crime occurred in a location used and frequented by the University community.

EMERGENCY RESPONSE AND EVACUATION PROCEDURES

Emergency Management at Grand Canyon University

The Environmental Health and Safety Department assists all University departments, including off campus locations by developing, maintaining, and implementing emergency evacuation plans, conducting drills and exercises, hazard and risk education, and building partnerships with external response agencies. The Environmental Health and Safety Department is responsible for assisting with and coordinating the University’s overarching Campus Emergency Management Plan (CEMP).

The Environmental Health and Safety Department develops and distributes emergency response procedures to students and employees. These procedures are maintained and distributed during various training sessions conducted throughout the year.

Drills, Exercises, and Training

To ensure the Campus's Emergency Management Plans remain current and actionable, the Environmental Health and Safety Department conducts at least one exercise annually. These exercises include, but are not limited to: tabletop exercises, drills, functional, or full-scale. After-

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action reviews of all emergency management exercises are completed, distributed to key stakeholders and retained for historical perspective. The Public Safety Department, along with representatives within the Environmental Health and Safety Department work with local, state, and federal response agencies and conduct joint training and exercises.

**Emergency Notification**

Grand Canyon University is committed to ensuring the campus community receives timely, accurate, and useful information in the event of a significant emergency or dangerous situation on campus or in the local area that poses an immediate threat to the health and safety of campus community members. The University will immediately create and issue an Emergency Notification to the University community upon confirmation of any significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus. The Director of Public Safety or designee, in conjunction with the national weather service, local first responders, health service departments, College administrators, etc., will be responsible for confirming the existence of a significant emergency or dangerous situation. Multiple methods may be used to send an Emergency Notification or follow-up messages and the means may change as the situation progresses:

- RAVE Text Message Notification System sends messages via SMS text message. Students are automatically entered into the system during enrollment. Faculty and staff are required to opt in and register using the Workday System.
- Alertus Emergency Notification System sends alerts to all student and campus email addresses, all LCD display screens on campus and all open desktop network computer screens.
- We may also use verbal announcements within buildings, public address systems, fire alarms, and posting to the AlertGCU webpage at [http://emergency.gcu.edu/](http://emergency.gcu.edu/)

For more information about timely warnings and emergency notifications please visit [http://emergency.gcu.edu/](http://emergency.gcu.edu/)

**Initiating the Emergency Notification System:**

When an emergency occurs on campus, Grand Canyon University will, without delay and taking into account the safety of the community, determine the content of the notification and initiate the appropriate notification system. Exceptions may be made if, in the professional judgment of responsible authorities, the notification will compromise efforts to assist victims or to contain, respond to, or otherwise mitigate the emergency. The initial notification and follow-up reports will be executed by the Public Safety Department. All communications to local and regional media will be managed by the Marketing Department. The emergency notification process involves the receipt of information, the verification of this information, and the evaluation of the information. These steps then set into motion the following actions:

- Determination if the entire campus community, or just an affected portion, will receive the emergency alert notification.
- Composition of the content of the emergency alert message.
- Activation of the RAVE Alert Notification System.

The following individuals may be involved in making these determinations/decisions:

- Director of Public Safety/Chief of Police or designee
- Assistant Director of Public Safety/Assistant Police Chief
- Public Safety/Police Commander
- Police Sergeant
- Campus Safety Manager
- Communications Supervisor

Other departments on campus may be in a position to confirm certain types of emergencies, such as pandemic flu outbreak, etc.

**Distribution of Emergency Notifications:**

Campus and/or local first responders on the scene of a critical incident or dangerous situation may determine that only a particular segment or segments of the campus community should receive the notification. In these types of incidents, generally campus community members in the immediate area of the dangerous situation (i.e., the building, adjacent buildings, or surrounding area) will receive the emergency notification
The Responsible Campus Authorities will continually evaluate the situation and assess the need to notify additional segments of the campus population if the notification has been segmented.

**Determining Content of the Emergency Notification:**

Speed and accuracy of the information are of utmost importance in issuing emergency notifications. To expedite this process and ensure each message contains essential information, the mass notification system contains pre-scripted templates for emergencies our campus could encounter. These messages identify the situation, allow for input of the location, and identify the immediate protective action that should be taken. In cases where no predetermined templates exist, the individual may use the “custom” template to craft a specific message. The goal is to ensure people are aware of what the situation is, where it is occurring and steps to take to stay safe.

**Procedures for Disseminating Emergency Information to the Larger Community (i.e., individuals and organizations outside the campus community):**

If the campus activates its Emergency Notification Systems in response to a situation that poses an immediate threat to members of the campus community and the surrounding community, the appropriate offices will notify the larger community about the situation and steps the campus has taken to address the emergency. Primarily, the Grand Canyon University Marketing Department is responsible for maintaining communications with news outlets, distribution of press releases, and scheduling of press conferences.

**Enrolling in the University’s RAVE Emergency Notification System:**

The RAVE emergency notification system is programmed to send alerts to all registered students, faculty, and staff. Contact information is removed from the RAVE system when University affiliation changes.

**Students:**

Students should be automatically enrolled into the system. If however during a scheduled and advertised test of the system a student discovers they did not receive the message, students can update their contact information through the Student Portal at https://myportal.gcu.edu/ or by contacting their Student Services Advisor.

**Faculty/Staff:**

Faculty and staff must opt-in and enter their contact information to receive RAVE alerts. To opt-in and update contact information, visit Workday at https://www.myworkday.com/gcu/d/home.htmld.

Members of the larger community are encouraged to follow us on Twitter, Facebook, or our websites.

**SECURITY AND ACCESS TO CAMPUS FACILITIES**

Grand Canyon University is a gated community and Public Safety security personnel are posted at guard stations at each entry to campus. Access to the campus is controlled by Public Safety Department personnel 24 hours a day.

On-campus student housing facilities are always secured and require an electronic key fob for entrance into the main lobby and halls. Electronic access to lobbies and halls is limited to only those living in the building. A unique key is required to enter each room from the electronically accessed hall. Public Safety security personnel are specifically assigned to patrol and monitor activity in each student housing building.

Other campus buildings (academic, administrative, social and athletic) are open from 6:00 am until 10:00 pm daily. Buildings are secured daily by Public Safety employees during non-business hours. Routine patrols of all buildings are conducted both during business hours and non-business hours. Access to individual classrooms and laboratories during business hours is limited to those enrolled in the courses meeting there. After-hours access is not authorized.

Facilities are maintained to ensure safety and security. Building design, landscaping and outdoor lighting are designed for safety and security. Sidewalks are designed to provide well-traveled, lighted routes from parking areas to buildings and from building to building. Grounds keeping personnel trim shrubs from sidewalks, walkways, and building entrances to provide a well-lit route to buildings. Students and employees are encouraged to report any security or maintenance needs to Public Safety at 602-639-8100. During regular business hours, the Facilities
Department will be notified to ensure that all maintenance requests are resolved in a timely manner. If after hours, Public Safety will immediately address any security needs and report maintenance issues to Facilities on a daily basis.

ID Cards

All Grand Canyon University students and staff are responsible for obtaining a Grand Canyon University ID card. ID cards are required to be carried at all times when on campus and will grant access to campus facilities. The Grand Canyon University Department of Public Safety has the right to request ID at any time.

Visitor Access

Anyone who brings a guest to Grand Canyon University is responsible for making relevant university policies and regulations known to them and must accept the responsibility for their conduct during their visit.

Lost and Found

Lost and Found is located in The Grove Garage (in the Public Safety Office, Building 80).

Open Monday-Friday from 8 am - 5 pm. To inquire about or report any lost, found or stolen items, please call 602-639-6367.

Parking Privileges and Vehicle Decals

Grand Canyon University students, faculty and staff are required to have a parking permit to park on campus. Parking permits can be purchased online at https://gcu.thepermitstore.com/ or by visiting the Campus Operations Office located in the Colter Office Complex. Students who have registered for handicapped parking permits online must provide acceptable medical documentation supporting a request for accommodations through the Student Disability Office.

All parking permits must be displayed in the lower portion of the driver's side windshield when parking on campus. Failure to display a permit could result in your vehicle being cited, wheel-locked or impounded.

Vehicle Problems

Public Safety may assist by jump starting or providing air or water for your vehicle and other reasonable assistance required to aid the temporarily stranded motorist.

Safety Escort Program

Public Safety will provide an officer safety escort by request. We will also make available mobile transports for those who have medical emergencies/injuries or disabilities. To schedule a safety escort, please call 602-639-8100 and be sure to give your name, location and destination.

Wellness Check

As part of Grand Canyon University's goal to keep students safe and ensure their well-being, there is a process that staff and faculty can utilize to report concerns about a specific student. If any staff or faculty member identifies that a student has expressed thoughts or threats to harm themselves or others, we encourage you to contact wellnesscheck@gcu.edu. The Department of Public Safety will attempt to intervene and work with Student Disability Services to provide appropriate guidance to ensure the student's well-being.

CRIME PREVENTION AND SAFETY AWARENESS PROGRAMS

Grand Canyon University is committed to providing a safe environment to the campus community. The Environmental Health and Safety and Public Safety Departments offer a variety of primary crime prevention programs to inform students and employees about campus security procedures and practices. These programs encourage students and employees to be responsible for their own safety and security and the safety and security of others (increase awareness to personal threats and be aware of one's surroundings). Some of the programs include:

Sexual Assault Prevention Class: This voluntary safety course is designed and implemented to teach each participant how to defend oneself against sexual assault. It also provides safety awareness and legal understanding. The class includes: hands-on defensive techniques, lecture, and scenario based learning. The class is offered to both females and males. It may be instructed to single sex groups only or to coed groups, depending upon request. Students, student workers, or staff members are welcome to attend at no charge. (Approx. 1.5 hours in duration).

Active Threats Response Class: This voluntary course is designed and implemented to teach each participant “fight” defenses against violent attacks that may occur in an educational setting. It also provides personal safety awareness and legal understanding. The class includes: hands-on
defensive techniques, lecture, and scenario based learning. The class is offered to both females and males. It may be full/partially included with the Rape Prevention class upon request from the participants. Students, student workers, or staff are welcome to attend at no charge. (Approx. 1.5 hours in duration).

**Emergency Management Procedures:** This class is offered for Grand Canyon University staff and student workers who are directly involved with providing or assisting with building, campus, off-campus, or event safety procedures. Each participant will learn about emergency and major incident protocols, responses, and best safety practices. Attendees will participate in a question and answer session. They may also be expected to voice concerns and provide best safety practices for their particular work location/job function. (Approx. 30-45 minutes).

**Building Evacuation:** This class is offered for Grand Canyon University staff and student workers who are directly involved with providing or assisting with building, campus, off-campus, or event safety. It is generally joined with the Emergency Management Procedures class. Each participant will learn about emergency evacuation protocols, responses, and best safety practices. Attendees will participate in reviewing evacuation maps and identifying exit doors, stairwells, and evacuation meeting places.

**Fire Safety/Extinguisher Certification:** This class is offered for designated Grand Canyon University staff and student workers who are directly involved with providing or assisting with fire safety. It is generally joined with the “Extinguisher Designated User” certification. Each participant will learn about fire safety/extinguisher use protocols, responses, and best safety practices. Attendees will perform the “PASS” technique upon completion.

To attend any of the above training programs contact Environmental Health and Safety at 602-639-7279 or email at EHS@gcu.edu.

**Safety Awareness Week:** A week long presentation where Public Safety Department and outside first responding agencies provide safety awareness information to students during the first week of the fall semester. Students are made aware of the above listed, hands on training and can sign up during this event or any time throughout the school year. Classes are held continuously throughout the year and are scheduled as often as needed to meet demand.

**MISSING STUDENT POLICY**

The Higher Education Opportunity Act of 2008 requires any institution participating in a Title IV federal student financial aid program that maintains on-campus housing facilities to establish a missing student notification policy and related procedures. The following policy and related procedures is Grand Canyon University’s official Missing Student Policy.

When it is determined that a student is apparently missing from the University, staff at Grand Canyon University, in collaboration with campus and local law enforcement, will be guided by this Missing Student Policy and standard operating procedures, to locate the student.

**Notifications**

The Missing Student Policy requires anyone who believes a Grand Canyon University student is missing to immediately notify the Public Safety Department. Specifically, staff in the Office of Residence Life, Student Affairs, and Public Safety should be contacted so that they can coordinate efforts to locate the student.

Grand Canyon University has developed a list of titles of persons and offices to which students, employees, or others can contact if they have reason to believe a student who lives in on-campus student housing has been missing for 24 hours. The list of positions, offices, and contact information to be utilized if a student is reported missing from campus is included below.

In addition to contacting these specific offices, anyone who has a concern that a student is missing should alert any Grand Canyon University employee who they think will aid in the investigation of a student disappearance. Beyond notifications made by campus employees to University staff, or campus security, in the absence of a campus police or campus security department, the University must refer immediately any missing student report to the local law enforcement agency that has jurisdiction in the geographical areas around the specific campus location.

**Registering and Notifying Missing Student Contacts**

In accordance with this policy, students residing in on-campus housing have the option to identify confidentially an individual to be contacted by Public Safety in the event the student is determined to be missing for more than 24 hours. If a student has identified such an individual, Public Safety will notify that individual no later than 24 hours after the student is determined to be missing. A student who wishes to identify a confidential contact can do so by contacting the Residence Life Department at 602-639-6244. A student’s confidential contact information will be accessible only by authorized campus officials and law enforcement in the course of the investigation.
Missing student contact information is registered confidentially. This information is private and only accessible to Grand Canyon University employees who are authorized campus officials. This information will not be disclosed to others with the exceptions to law enforcement personnel in the furtherance of a missing student investigation.

After investigating a missing person report, should Public Safety determine that the student has been missing for 24 hours, they will notify the Phoenix Police Department and the student’s emergency contact no later than 24 hours after the student is determined to be missing. If the missing student is under the age of 18 and is not an emancipated individual, Public Safety will immediately notify the student’s parent or legal guardian.

**Notifying Law Enforcement**

Grand Canyon University will also notify the appropriate local law enforcement agency of the missing student unless the local law enforcement agency was the entity that made the determination that the student was missing. This notification will include any missing student who lives in on-campus housing regardless of age or status, and regardless of whether he or she has registered a confidential missing student or general emergency contact person. This notification will be made no later than 24 hours after the time that the student is determined missing.

**University Contacts for Missing Students**

Residence Life: 602-639-6244  
Public Safety: 602-639-8100

**GRAND CANYON UNIVERSITY’S COMMITMENT TO TITLE IX**

**Sexual Misconduct**

Grand Canyon University prohibits sexually violent acts, termed “Sexual Misconduct” by the University, which can be crimes as well. Sexual misconduct includes non-consensual sexual intercourse, non-consensual sexual contact, sexual exploitation, interpersonal/relationship violence, sex/gender-based stalking, and sexual harassment. While Grand Canyon University utilizes different standards and definitions than the Arizona Revised Statues, sexual misconduct often overlaps with the crimes of sexual assault, sexual harassment, stalking, dating violence, domestic violence, and consent. Victims of these behaviors are protected by federal laws, specifically Title IX, and the Clery Act, which mandates the contents of this report.

**Arizona Code Definitions:**

**Dating Violence** – no definition of the term provided in the Arizona Revised Statues

**Domestic Violence** –

A.R.S. 13-3601. Domestic violence; definition; classification; sentencing option; arrest and procedure for violation; weapon seizure

A. “Domestic violence” means any act that is a dangerous crime against children as defined in section 13-705 or an offense prescribed in section 13-1102, 13-1103, 13-1104, 13-1105, 13-1201, 13-1202, 13-1203, 13-1204, 13-1302, 13-1303, 13-1304, 13-1406, 13-1425, 13-1502, 13-1503, 13-1504, 13-1602 or 13-2810, section 13-2904, subsection A, paragraph 1, 2, 3 or 6, section 13-2910, subsection A, paragraph 8 or 9, section 13-2915, subsection A, paragraph 3 or section 13-2916, 13-2921, 13-2921.01, 13-2923, 13-3019, 13-3601.02 or 13-3623, if any of the following applies:

1. The relationship between the victim and the defendant is one of marriage or former marriage or of persons residing or having resided in the same household.
2. The victim and the defendant have a child in common.
3. The victim or the defendant is pregnant by the other party.
4. The victim is related to the defendant or the defendant’s spouse by blood or court order as a parent, grandparent, child, grandchild, brother or sister or by marriage as a parent-in-law, grandparent-in-law, stepparent, step-grandparent, stepchild, step-grandchild, brother-in-law or sister-in-law.
5. The victim is a child who resides or has resided in the same household as the defendant and is related by blood to a former spouse of the defendant or to a person who resides or who has resided in the same household as the defendant.
6. The relationship between the victim and the defendant is currently or was previously a romantic or sexual relationship. The following factors may be considered in determining whether the relationship between the victim and the defendant is currently or was previously a romantic or sexual relationship:
   a. The type of relationship.
   b. The length of the relationship.
   c. The frequency of the interaction between the victim and the defendant.
   d. If the relationship has terminated, the length of time since the termination.

**Sexual Assault**

13-1406. Sexual assault; classification; increased punishment

A. A person commits sexual assault by intentionally or knowingly engaging in sexual intercourse or oral sexual contact with any person without consent of such person.

**Stalking**

13-2923. Stalking; classification; exceptions; definitions

A. A person commits stalking if the person intentionally or knowingly engages in a course of conduct that is directed toward another person and if that conduct causes the victim to:
   1. Suffer emotional distress or reasonably fear that either:
      a. The victim’s property will be damaged or destroyed.
      b. Any of the following will be physically injured:
         i. The victim.
         ii. The victim’s family member, domestic animal or livestock.
         iii. A person with whom the victim has or has previously had a romantic or sexual relationship.
         iv. A person who regularly resides in the victim’s household or has resided in the victim’s household within the six months before the last conduct occurred.
   2. Reasonably fear death or the death of any of the following:
      a. The victim’s family member, domestic animal or livestock.
      b. A person with whom the victim has or has previously had a romantic or sexual relationship.
      c. A person who regularly resides in the victim’s household or has resided in the victim’s household within the six months before the last conduct occurred.

B. This section does not apply to an interactive computer service, as defined in 47 United States Code section 230(f)(2), or to an information service or telecommunications service, as defined in 47 United States Code section 153, for content that is provided by another person.

C. Stalking under subsection A, paragraph 1 of this section is a class 5 felony. Stalking under subsection A, paragraph 2 of this section is a class 3 felony.

D. For the purposes of this section:
   1. “Course of conduct”:
      a. Means directly or indirectly, in person or through one or more third persons or by any other means, to do any of the following:
         i. Maintain visual or physical proximity to a specific person or direct verbal, written or other threats, whether express or implied, to a specific person on two or more occasions over a period of time, however short.
         ii. Use any electronic, digital or global positioning system device to surveil a specific person or a specific person’s internet or wireless activity continuously for twelve hours or more or on two or more occasions over a period of time, however short, without authorization.
iii. Communicate, or cause to be communicated, on more than one occasion words, images or language by or through the use of electronic mail or an electronic communication that is directed at a specific person without authorization and without a legitimate purpose.

b. Does not include constitutionally protected activity or other activity authorized by law, the other person, the other person’s authorized representative or if the other person is a minor, the minor’s parent or guardian.

2. “Emotional distress” means significant mental suffering or distress that may, but does not have to, require medical or other professional treatment or counseling.

Consent

13-1401. Definitions; factors

1. “Without consent” includes any of the following:

   a. The victim is coerced by the immediate use or threatened use of force against a person or property.

   b. The victim is incapable of consent by reason of mental disorder, mental defect, drugs, alcohol, sleep or any other similar impairment of cognition and such condition is known or should have reasonably been known to the defendant. For the purposes of this subdivision, “mental defect” means the victim is unable to comprehend the distinctively sexual nature of the conduct or is incapable of understanding or exercising the right to refuse to engage in the conduct with another.

   c. The victim is intentionally deceived as to the nature of the act.

   d. The victim is intentionally deceived to erroneously believe that the person is the victim’s spouse.

While providing the applicable definitions are important to the Grand Canyon University for educational and awareness purposes, GCU uses its institutional definitions in cases where dating violence, domestic violence, sexual assault, or stalking are alleged:

Institutional Definitions:

Dating Violence/Domestic Violence – Defined as Intimate Partner Violence

Intimate Partner Violence:

Any act of abuse, violence or threatened act of violence that occurs between individuals who are involved or have been involved in a sexual, dating, spousal, domestic, or other intimate relationship. Psychological abuse is a form of Intimate Partner Violence.

Sexual Assault – Defined as Non-Consensual Sexual Contact and/or Non-Consensual Sexual Intercourse

Non-Consensual Sexual Contact is:

- any intentional sexual touching,
- however slight,
- with any object,
- by one person upon another,
- that is without consent and/or by force.

Sexual Contact includes:

Intentional contact with the breasts, buttock, groin, or genitals, or touching another with any of these body parts, or making another touch you or themselves with or on any of these body parts; any intentional bodily contact in a sexual manner, though not involving contact with/of/by breasts, buttocks, groin, genitals, mouth or other orifice.

Non-Consensual Sexual Intercourse is:

- any sexual intercourse
- however slight,
- with any object,
- by one person upon another,
- that is without consent and/or by force.
Intercourse includes:
Vaginal penetration by a penis, object, tongue or finger, anal penetration by a penis, object, tongue, or finger, and oral copulation (mouth to genital contact or genital to mouth contact), no matter how slight the penetration or contact.

Stalking
Engaging in a course of conduct directed at a specific person, on the basis of sex/gender, that is unwelcome, and would cause a reasonable person to fear bodily injury or to experience substantial emotional distress.

- Stalking includes, but is not limited to acts in which a person directly, indirectly, or through third Parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about another person, or interferes with another person’s property.
- Stalking includes “cyber-stalking,” a particular form of stalking in which a person uses electronic media, such as the internet, social networks, blogs, cell phones, texts, or other similar devices or forms of contact.

Consent
An understandable exchange of affirmative words or actions, as long as those words or actions create mutually understandable clear permission regarding willingness to engage in (and the conditions of) sexual activity.

- Silence does not necessarily constitute consent.
- In the absence of mutually understandable words or actions, it is the responsibility of the initiator, or the person who wants to engage in the specific sexual activity, to make sure that he/she has the consent from his/her partner(s).
- Consent to any one form of sexual activity cannot automatically imply consent to any other forms of sexual activity.
- Previous relationships or prior consent cannot imply consent to future sexual acts.
- Effective consent may not be given by minors less than 18 years old.

Generally, Grand Canyon University will not notify local/campus law enforcement when sexual misconduct occurs, unless a victim wishes, there is an emergency threat to health or safety, or where legally required by law. Victims are provided written documentation, including a printed copy of the institution’s Title IX Policy and Procedures, and the Information, Policy, and Resources Regarding Sexual Misconduct booklet, which outlines their right to notify law enforcement directly, to be assisted in doing so by campus authorities, and to decline to notify such authorities. If requested, campus officials can facilitate reporting to campus or local law enforcement, but also respect a victim's request not to do so.

In an effort to reduce the risk of sexual misconduct as well as the crimes of sexual assault, sexual harassment, stalking, dating violence, and domestic violence occurring among its students, the University utilizes a range of campaigns, strategies, and initiatives to promote awareness, educational, risk reduction, and prevention programming.

The University offers programming to identify and prevent domestic violence, dating violence, sexual assault (including stranger and known offender assaults), and stalking each year. Educational programs are offered to raise awareness for all incoming students and employees, and are often conducted during new student and new employee orientation and throughout an incoming student’s first semester. Programs and other campaigns offered throughout the year to all students and employees include strong messages regarding not just awareness, but also primary prevention (including normative messaging, environmental management, and bystander intervention), and discuss institutional policies on sexual misconduct as well as domestic violence, dating violence, sexual assault, stalking, and consent in reference to sexual activity. Programs also offer information on risk reduction that strives to empower victims, how to recognize warning signals and how to avoid potential attacks, and do so without victim-blaming approaches. Programs are informed by evidence-based research and/or are assessed for their effectiveness.

Programming includes:

**Awareness Programs**

- Safety Awareness Week- A week long presentation where the Public Safety Department and outside first responding agencies provide safety awareness information to students, faculty, and staff during the first week of the fall semester. Participants are made aware of the above listed, hands on training and can sign up during this event or any time throughout the school year.
- Domestic and Intimate Partner Violence Awareness Month- In the month of October, GCU provides information to students, faculty and staff on promoting respectful, non-violent relationships. Focus is placed on outlining safe and healthy relationship behaviors, and identifying early warning signs of unsafe coercive behavior.
• Halloween Safety- In the days leading up to Halloween, information is distributed for student, faculty, and staff regarding personal safety, accident prevention, and general safety precautions.

• Stalking Awareness Month- In the month of January, GCU provides information to educate students, faculty, and staff to raise awareness about stalking behaviors. Focus is placed on learning the signs of stalking, indicators of healthy and unhealthy relationship dynamics, and resources available on campus and in the community.

• Valentine’s Day- In the days leading up to Valentine’s Day, information is distributed which focuses on the aspects of good relationships, mutual respect, consent and personal safety.

• Spring Break Safety Week- In the days leading up to Spring Break, students receive information on ways to make safe choices while on break.

• Sexual Assault Awareness Month- In the month of April, GCU provides information to raise awareness and educate the Grand Canyon University community on how to prevent sexual assault by promoting safety, respect, and equality.

Bystander Intervention
• Step UP!- Step UP! Is a prosocial behavior and bystander intervention program that educates participants to be proactive in helping others.
• It’s On Us- A national movement on campuses to end sexual assault, It’s On Us asks students, faculty, staff, University leaders, parents, and campus organizations to step up and be part of the solution to end sexual assault.

Ongoing Prevention and Awareness Campaigns
• Weekly Mental Health Vitamin- A weekly in-depth focus on topics related to mental health awareness and tips for managing mental strength and emotional wellness. Information is posted for the GCU community through the news.gcu.edu website.
• Office of Student Care Groups- Group counseling sessions are conducted by licensed professional counselors to discuss common struggles and focus on support, personal growth and skills development.
• Diversity Speaks- Diversity Speaks, presented by the Associated Students of Grand Canyon University (ASGCU) aims to educate the GCU Community around pertinent issues of diversity. Diversity Speaks will feature interactive lectures from diversity leaders from near and far. All students, faculty, and staff are encouraged to engage in this exciting time of exploration and learning.

Primary Prevention Programs
• Title IX Curriculum Module- A comprehensive module regarding the applicability of Title IX, University policies regarding sexual harassment and sexual misconduct, reporting options, and resources. The module is required for undergraduate students in University Success courses, as well as graduate students in the introduction to Graduate Studies courses.
• Annual Employee Training- A comprehensive training module, outlining the University policies regarding sexual harassment and sexual misconduct. The purpose of the module is to help employees and full-time faculty identify behaviors that may be in violation of University policy, understand their reporting obligations, and know how to support the University’s efforts to prevent behaviors that may contribute to a hostile environment.
• Adjunct Onboarding Training- A training module targeted towards issues that adjunct instructors may encounter. It informs them of University policies regarding sexual harassment and sexual misconduct, as well as their duty to report potential violations of the policy. The training aims to help adjuncts understand how to respond to disclosures of sexual misconduct, and where to direct students for assistance.
• Health and Wellness Fair- Canyon Health and Wellness Center collaborates with local and GCU community resources to promote health and wellness activities to GCU students, faculty and staff.
• Lopes Living Well- Lopes Living Well is a resources hub where students can find information and resources related to common feelings experienced by college students, such as relationship problems, substance abuse and dependence, and stress. Faculty and staff are provided training on identifying warning signs and intervening with appropriate resources.

Risk Reduction
• Sexual Assault Prevention Class- This voluntary safety course is designed and implemented to teach each participant how to defend oneself against sexual assault. It also provides safety awareness and legal understanding. The class includes: hands-on defensive techniques, lecture, and scenario based learning. The class is offered to both females and males. It may be instructed to sign sex groups only or to coed groups, depending upon request. Students, faculty, and staff members are welcome to attend at no charge.
Bystander Intervention

Bystander engagement is encouraged through safe and positive intervention techniques and by empowering third-party intervention and prevention such as calling for help, using intervention-based apps, identifying allies, and/or creating distractions. Bystander empowerment training highlights the need for those who intervene to ensure their own safety in the intervention techniques they choose, and motivates them to intervene as stakeholders in the safety of the community when others might choose to be bystanders.

Protection Measures

In the event that sexual misconduct, gender-based violence, or the crimes of sexual assault, stalking, dating violence, or domestic violence do occur, the University takes the matter very seriously. Grand Canyon University employs interim protection measures such as interim suspensions and/or no contact orders in any case where a student’s behavior represents a risk of violence, threat, pattern, or predation. The Title IX Office can issue a No-Contact Order, which prohibits in-person, electronic, and third-party contact between the parties.

To ensure students, faculty, and staff are aware of how and to whom an alleged offense should be reported, the Title IX office contact information is provided broadly across campus in the form of posters, business cards, informational sheets, and the Information, Policy and Resources Regarding Sexual Misconduct booklet. Additionally, the institutional Title IX Policy and Procedures are outlined in the University Policy Handbook, as well as www.gcu.edu/titleix. A student wishing to officially report such an incident may do so by contacting:

Title IX Coordinator, Deputy Coordinator, and Assistant Deputy Coordinators

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<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Contact Information</th>
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<tr>
<td>Shanna Milonas, MBA</td>
<td>Title IX Coordinator</td>
<td>602-639-5900</td>
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<td></td>
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<td><a href="mailto:titleix@gcu.edu">titleix@gcu.edu</a></td>
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<tr>
<td>Kelsey Cross</td>
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<tr>
<td>Tim Griffin</td>
<td>Assistant Deputy Title IX Coordinator for Students</td>
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<td>Jamie Boggs</td>
<td>Assistant Deputy Title IX Coordinator for Athletics</td>
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<td><a href="mailto:Jamie.Boggs@gcu.edu">Jamie.Boggs@gcu.edu</a></td>
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Grand Canyon University Department of Public Safety

602-639-8100 or in-person at the Public Safety Office

 Residence Life

602-639-6244 or in-person to any Resident Director (RD), Resident Assistant (RA), or any member of the Student Affairs staff

 Any Grand Canyon University staff or faculty member

All GCU faculty and staff are considered mandatory reporters and are required to report any incident of possible sexual harassment, sexual misconduct, or sex/gender-based discrimination or harassment.

Anyone with knowledge about sexual misconduct, gender-based violence, or the crimes of sexual assault, sexual harassment, stalking, dating violence, or domestic violence is encouraged to report it immediately. Protective measures for victims are available from the campus whether a victim chooses to report to local and/or campus law enforcement, and irrespective of whether a victim pursues a formal complaint through the University resolution process.

For victims of sexual misconduct, gender-based violence, or the crimes of sexual assault, acquaintance rape, sexual harassment, stalking, dating violence, or domestic violence, some or all of these safety suggestions may guide you after an incident has occurred:

1. Go to a safe place and speak with someone you trust. Tell this person what happened. If there is any immediate danger, contact Public Safety if you are on campus or call 911 if you are off campus.
2. Consider securing immediate professional support (e.g., counseling, victim advocacy, medical services, etc.) to assist you in the crisis.
3. While on campus during regular business hours, students may see the licensed therapists in the Office of Student Care. Additionally, students, faculty, and staff can receive medical assistance, support, and guidance at Canyon Health and Wellness Clinic. These are both confidential resources.
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- Office of Student Care: 602-639-7007
- Canyon Health and Wellness Clinic: 602-639-6215

After regular business hours, or in any situation where a victim wishes, external resources are also available and may be able to provide confidential assistance:

- EMPACT Sexual Assault Hotline: 480-736-4949
- National Domestic Violence Hotline: 1-800-799-SAFE, or chat online at thehotline.org
- National Sexual Assault Hotline: 1-800-656-HOPE or chat online at online.rainn.org

4. For safety and well-being, immediate medical attention is encouraged. Further, being examined as soon as possible, ideally within 120 hours, is important in the case of sexual assault. The hospital will arrange for a specific medical examination at no charge or can work with you to arrange state reimbursement. Preserving evidence is important in cases of both sex-based discrimination and sexual misconduct. Electronic evidence can be extremely important for the outcome of an investigation. Save and/or screenshot any relevant text messages, social media posts, photos, snapchats, voicemails or emails. These can be provided to Public Safety or the Title IX investigator for use in a University investigation.

The following information may be helpful as proof of a crime, to obtain an order of protection, or to offer proof of a campus policy violation:

- To preserve evidence, it is recommended not to bathe, shower, douche, eat, drink, smoke, brush your teeth, urinate, defecate, or change clothes before receiving medical attention. Even if any of these actions have already taken place, victims are still encouraged to have prompt medical care, and evidence may still be recoverable.
- Typically, if police are involved or will be involved, they will obtain evidence from the scene, and it is best to leave things undisturbed until their arrival. They will gather bedding, linens or unlaundered clothing, and any other pertinent articles that may be used for evidence. It is best to allow police to secure items in evidence containers, but if you are involved in transmission of items of evidence, such as to the hospital, secure them in a clean paper bag or clean sheet to avoid contamination.
- If physical injuries are present, photograph or have them photographed, with a date stamp on the photo.
- Record the names of any witnesses and their contact information.
- Try to memorize details (e.g., physical description, names, license plate number, car description, etc.), or even better, write notes to remind you of details, if you have time and the ability to do so.
- If an external order of protection is obtained (e.g., restraining orders, injunctions, protection from abuse), please notify Public Safety and the campus Title IX Coordinator so that those orders can be observed on campus.

5. Even after the immediate crisis has passed, consider seeking support from the Office of Student Care, the Canyon Health and Wellness Clinic, and/or external organizations.

6. Contact the Title IX Coordinator at 602-639-5900 or titleix@gcu.edu if you need assistance with University-related processes, such as no-contact orders or other institutional protective measures. The Title IX Coordinator and/or Public Safety Department will also assist in any needed advocacy for students who wish to obtain protective or restraining orders from local authorities. The University is able to offer reasonable academic supports, changes to living arrangements, transportation resources or modifications, escorts, no contact orders, counseling services access, and other supports and resources as needed by a victim. The University is able to offer information about legal assistance, visa/immigration assistance, and student financial aid considerations for victims.

Sexual Harassment

Sexual harassment is a form of misconduct that undermines the integrity of the academic environment. It is the policy of Grand Canyon University that sexual harassment is prohibited. All members of the University community, especially officers, faculty, and other individuals who exercise supervisory authority, have an obligation to promote an environment that is free of sexual harassment. Sexual harassment is defined as:

Sexual Harassment is unwelcome, gender-based verbal or physical conduct that is sufficiently severe, persistent or pervasive that it:

- Unreasonably interferes with, denies or limits someone's ability to participate in or benefit from the university's educational program and/or activities, and is based on power differentials (quid pro quo), the creation of a hostile environment, or retaliation.
Any complaints or inquiries regarding sexual harassment of a student by a University official, faculty member, or staff member should be brought to the immediate attention of the Title IX Coordinator. Any complaints or inquiries regarding sexual harassment of a student by another student should be brought to the immediate attention of the Title IX Coordinator. The University will investigate such claims promptly and thoroughly. If, for any reason, a student wishes to complain or inquire regarding sexual harassment, but feels it would not be appropriate to raise such issues with the Title IX Coordinator directly, the student may inquire or complain to the Deputy Title IX Coordinator, any Assistant Deputy Title IX Coordinator, Public Safety Officer, Resident Director, Resident Assistant, or other staff/faculty member. All such inquiries or complaints will receive a prompt and thorough investigation by a trained Title IX Investigator. If harassment is established, the University will discipline the offender. Disciplinary action for violations of this policy can range from verbal or written warnings, up to and including immediate termination from employment or dismissal from the University for serious or repeated violations.

**Sex Offenders**

In accordance to the Campus Sex Crimes Prevention Act of 2000, which amends the Jacob Wetterling Crimes Against Children and Sexually Violent Offender Registration Act, the Jeanne Clery Act and the Family Educational Rights and Privacy Act of 1974, the Grand Canyon University Public Safety Department is providing URL links to identify sex offenders on or near campus, or anywhere in the United States.

Visit [https://www.azdps.gov/services/public/offender](https://www.azdps.gov/services/public/offender) or [http://nsopw.gov/Core/Portal.aspx](http://nsopw.gov/Core/Portal.aspx) You may search by city, county or zip code. All sex offenders are required to register in the state of Arizona and to provide notice of each institution of higher education in Arizona at which the person is employed, carries out a vocation, or is a student.

**CAMPUS PROCEEDURES FOR ADDRESSING SEXUAL MISCONDUCT, DATING VIOLENCE, DOMESTIC VIOLENCE, STALKING, SEXUAL HARASSMENT, AND OTHER ACTS OF SEX AND GENDER DISCRIMINATION**

For offenses including sexual misconduct or other gender based violence, which typically include the crimes of domestic violence, dating violence, sexual harassment, sexual misconduct, and stalking, sanctions range from warning to expulsion. Consequences for violating the Title IX Policy and Procedures will depend upon the facts and circumstances of each particular situation. In determining the severity of sanctions or corrective actions, factors such as the frequency and severity of the offense and any history of past discriminatory, harassing or retaliatory conduct are relevant. The sanctions may include, but are not limited to:

- Any student found responsible for violating the policy on Non-Consensual or Forced Sexual Contact (where no intercourse has occurred) will receive a sanction ranging from warning, which may include, but is not limited to, community service, educational sanctions, organizational sanctions, loss of privileges, up through and including suspension or expulsion, depending on the severity of the incident, and taking into account any previous violations.
- Any student found responsible for violating the policy on Non-Consensual or Forced Sexual Intercourse will face a recommended sanction of suspension or expulsion.
- Any student found responsible for violating the policy on sexual harassment, sexual exploitation, or other misconduct or harassment offenses will likely receive a sanction ranging from warning, which may include, but is not limited to, community service, educational sanction, organizational sanctions, loss of privileges, up through and including suspension or expulsion, depending on the severity of the incident, and taking into account any previous violations.
- For employees, any finding that a policy violation occurred may be cause for disciplinary action starting with an initial Corrective Action Plan, up to and including termination.

Any member of the University community who knowingly files a false complaint of sexual harassment, or who knowingly provides false information to or intentionally misleads university officials who are investigating or reviewing a complaint of alleged sexual harassment, is subject to disciplinary action up to and including discharge for employees and dismissal for students.

Procedurally, when the University receives a report of sexual misconduct, gender-based violence, or other sex or gender discrimination, the campus Title IX Coordinator is notified. If a party involved in the complaint wishes to access local community agencies and/or law enforcement for support, the Title IX Coordinator will assist in making these contacts. The Title IX Coordinator will offer assistance to parties in the form of interim or long-terms measures such as opportunities for academic accommodations; changes in housing; visa and immigration assistance; changes in working situations; and other assistance as may be appropriate and available on campus or in the community (such as no contact orders,
campus escorts, transportation assistance, targeted interventions, etc.). If a party desires, that individual will be connected with a counselor on-or off-campus. The parties are not required to take advantage of these services and resources, but the University provides them to offer help and support without condition or qualification.

Written materials are provided to all victims, whether they are students, employees, guests, or visitors, and outline rights, options, interim or long-term measures and resources, as well as investigative and resolution procedures. The written materials include the Information, Policy, and Resources Regarding Sexual Misconduct booklet, a printed copy of the institution’s Title IX Policy and Procedures, and as well as other documents which provide detailed information on other resources that are available.

When appropriate upon receipt of notice, the Title IX Coordinator will cause a prompt, fair, and impartial process to be initiated, commencing with an investigation, which may lead to the imposition of sanctions based upon a preponderance of evidence (what is more likely than not), upon a responsible student or other accused individual.

**Timeframes for Resolution of Complaints**

A Title IX Investigation will normally be completed within 60 calendar days after the University has notice of an allegation of prohibited conduct. The Title IX Coordinator or designee may extend this timeframe for good cause, including but not limited to, law enforcement involvement, number of witnesses to be interviewed, and University breaks. The University will take all reasonable efforts to apprise the Parties of the progress of the investigation. Anyone with a perceived conflict of interest may not be a part of the fact finding or decision making process.

**Investigation and Resolution Procedures:**

There are multiple options for investigation and resolution of complaints, which determines the type of disciplinary proceeding will be used by the institution.

**Informal Resolution**

Some complaints may allow for a voluntary informal resolution. After the Responding Party has the opportunity to review the written complaint, if informal resolution is appropriate, a resolution of the conflict that is agreeable to all Parties will be pursued. Under the informal process, GCU is required to only conduct such fact-finding as is useful to resolve the complaint, and to protect the interests of the Parties, the University, and the community. A formal investigation can be requested at any time by the Parties during the informal resolution process, or as initiated by GCU.

If a satisfactory resolution is reached, the matter will be considered closed, and both Parties will be provided simultaneous written notification of the outcome. Should any change in outcome occur prior to finalization, all parties will be timely informed simultaneously in writing, and will be notified when the results of the resolution process become final.

**Responding Party Admits to Violation**

If at any point during the investigative process the Responding Party admits to the Title IX policy violation, the investigation will conclude and be submitted for adjudication. The Title IX Coordinator will review the prepared investigative materials, along with the Responding Party’s admission, and will determine sanctions accordingly. Both Parties will be provided simultaneous written notification of the outcome. Should any change in outcome occur prior to finalization, all parties will be timely informed simultaneously in writing, and will be notified when the results of the resolution process become final.

**Formal Investigation and Adjudication Where the Responding Party is an Individual**

If investigation is to commence, the Responding Party will receive a Notice of Investigation as notification that a report has been filed, and will have the opportunity to review the written compliant or otherwise be informed of the substance of the allegation. If the Responding Party cannot be located, attempts at notification will be documented and additional University actions may take place to ensure a documented response to the notification.

A trained Investigator will interview the Reporting Party, Responding Party, and, as applicable, any witnesses. The Reporting Party and Responding Party may each have an advisor of their choice present at all interviews in which they participate. The Investigator will also gather any pertinent evidentiary materials (this may include, but is not limited to, emails, written documents, or photographs). During the investigation process, both the Reporting Party and the Responding Party will have opportunity to provide the Investigator with evidence and/or specify witness information. The Investigator will then prepare a report detailing the relevant content of the interviews and the documentation materials gathered, which is submitted to the Title IX Coordinator for review. Directly following the submission of the investigative report, the Title IX
Coordinator will determine sanctions if a policy violation has been found, or determine that no policy violation has occurred.

At any point during the investigation, if it is determined there is no reasonable cause to believe that University policy has been violated, the Title IX Coordinator has authority to terminate the investigation and end resolution proceedings.

During the course of an investigation, should the Responding Party withdraw from the University, official transcripts will not be released until the conclusion and adjudication of the investigation.

For all levels of adjudication, the rules of evidence, process and procedure used in civil or criminal court do not apply and will be based on the preponderance of the evidence standard (i.e. it is more likely than not that a policy violation occurred).

**Adjudication Where the Responding Party is an Individual**

**Administrative Adjudication – No Policy Violation**

Prior to submission to the Title IX Coordinator, or designee, both Parties will have the opportunity to review the investigative report and the documentation material. If no violation is found to have occurred, the Reporting Party will be given the opportunity to accept the finding of no violation. If the Reporting Party accepts, the decision of no violation will be simultaneously communicated to both Parties in writing, and the decision is not appealable by the Reporting Party. The Reporting Party will have 3 days to decide to accept or reject the finding. If the Reporting Party does not submit a decision within the 3 days, the decision of no violation will be finalized. If the Reporting Party rejects the finding of no violation, the Parties will be simultaneously notified that the case will be forwarded to the Title IX Hearing Board. GCU will continue to assist the Parties with resources as applicable.

**Administrative Adjudication – Policy Violation Established**

Prior to submission to the Title IX Coordinator, or designee, both Parties will have the opportunity to review the investigative report and the documentation material. If a violation is found to have occurred, the Responding Party will be given the opportunity to accept the findings and sanctions as issued by the Title IX Coordinator, or designee. If the Responding Party accepts, the decision and sanctions will be simultaneously communicated to both Parties in writing, and the decision is not appealable by the Responding Party. The Responding Party will have 3 days to decide to accept or reject the finding. If the Responding Party does not submit a decision within the 3 days, the sanctions will be imposed as outlined in the decision letter. If the Responding Party rejects the findings and sanctions, the Parties will be simultaneously notified that the case will be forwarded to the Title IX Hearing Board. GCU will continue to assist the Parties with resources as applicable. Should any change in outcome occur prior to finalization, all parties will be timely informed simultaneously in writing, and will be notified when the results of the resolution process become final.

**Title IX Hearing Board Adjudication – Policy Violation Established**

If the decision rendered through the Administrative Adjudication is rejected, the issue is forwarded to the University’s Title IX Hearing Board for a formal hearing, which will be convened within 10 business days of the Reporting or Responding Party’s rejection of the finding. The Parties will be notified of the date, time, and location of the hearing. One member of the Board will be designated as the Chair and responsible for administering the hearing and recording the decision. The Board members will be given timely and equal access to the information that will be used at the hearing.

A Title IX Hearing Board meeting regarding a violation under this policy will consist of the following components:

- Introduction of members and procedural rules
  - Reporting Party, Responding Party, and Advisors are to address the Board only.
  - Reporting Party, Responding Party, and Advisors cannot interact with and are not permitted to speak to or question opposing party.
  - Reporting Party, Responding Party, and Advisors cannot interject or correct the Investigator or opposing party during the presentation of the case.
- Presentation of the information and investigative report by the Investigator
- Questions asked by Board (directed toward Investigator, or the Parties as necessary)
- Closed deliberation, as determined by a majority vote, by Title IX Hearing Board
The Reporting Party has the option to not be in the same room with the Responding Party during the hearing, and the University will accommodate and facilitate such requests to the extent practicable. It is not required that either Party attend the scheduled hearing; however, the hearing will proceed in their absence, and a determination will be made by the Title IX Hearing Board.

Where the preponderance of the evidence supports the findings against the Responding Party, the Title IX Hearing Board will institute penalties for the infractions in accordance with the sanction statement listed above. Notification of the decision will be provided simultaneously in writing to both Parties within three (3) business days after the hearing has been completed. GCU will continue to assist the Reporting Party with resources as applicable. Should any change in outcome occur prior to finalization, all parties will be timely informed simultaneously in writing, and will be notified when the results of the resolution process become final.

Appeal Process

Either party will have three (3) business days to appeal the decision made during the hearing. All appeals must be made in writing, providing additional documentation for consideration. Appeals are not intended to be full re-hearings of the complaint, and as such, appeals will only be accepted based on one of the following factors:

- Procedural error or omission
- New evidence that was unknown or not available during the original hearing
- Substantially disproportionate sanctions

Disagreement with the findings or sanctions is not, by itself, grounds for an appeal. The request for an appeal, including the grounds upon which the request is based and the documentation thereof should be submitted in writing to the Title IX Coordinator:

Shanna Milonas, MBA  
Assistant Vice President of Academic Compliance  
3300 W. Camelback Road  
Phoenix, AZ 85017  
602-639-5900  
titleix@gcu.edu

Both Parties will be notified simultaneously in writing if an appeal is submitted. The appeal will be submitted for an initial review to the Title IX Appeal Committee, who will be given timely and equal access to the complaint, investigative report, appeal, and any other relevant documentation. One member of the Committee will be designated as the Chair and responsible for administering the hearing and recording the decision. The Title IX Appeal Committee will review the appeal and new documentation to determine if the appeal meets the limited grounds described above. If the Title IX Appeal Committee determines that grounds are met, it will review the appeal in light of the new information. Appeals are confined to a review of the written documentation or record of the original hearing, and pertinent documentation regarding the grounds for appeal. Appeal decisions are to be differential to the original hearing body, making changes to the finding only where this is clear error, and only to the sanction if there is a compelling justification to do so. A decision will be issued simultaneously to the Parties within 15 business days of the appeal being accepted. Any sanctions will remain in place during the appeal process. Should any change in outcome occur prior to finalization, all parties will be timely informed simultaneously in writing, and will be notified when the results of the resolution process become final. The Title IX Appeal Committee’s decision to deny an appeal request, or an appeal decision is considered the final decision of the University.

The Title IX Coordinator is ultimately responsible for assuring in all cases that the behavior is brought to an end, the University acts to reasonably prevent its recurrence, and the effects on the victim and the community are remedied. The Title IX Coordinator is also responsible for assuring that training is conducted annually for all investigators, hearing officers, panelists, and appeals officers that encompass a hearing process that protects the safety of victims and promotes accountability. Training will focus on sexual misconduct, domestic violence, dating violence, sexual assault, stalking, sexual harassment, retaliation, and other behaviors that can be forms of sex or gender discrimination covered by Title IX and Clery Act. Training will help those decision-makers in the process of protecting the safety of victims and promoting accountability for those who commit offenses. Training is updated and revised as necessary to address the latest issues, techniques, best practices, and regulatory requirements for conducting proceedings, and may be conducted in-person, by electronic means, or through continuing education resources (i.e. case law or peer-reviewed educational materials). Training addresses, but is not limited to:

- Relevant evidence and how it should be used during a proceeding;
- Proper techniques for questioning witnesses;
• Basic procedural rules for conducting a proceeding;
• Avoiding actual and perceived conflicts of interest;
• Consent and incapacity; and
• Assessing credibility.

The investigation and records of the resolution conducted by the University are maintained confidentially. Information is shared internally between administrators who need to know, but a tight circle is kept. Where information must be shared to permit the investigation to move forward, the person bringing the accusation will be informed. Privacy of the records specific to the investigation is maintained in accordance with Arizona law and the federal FERPA statute. Any public release of information needed to comply with the open crime logs or timely warning provisions of the Clery Act will not include the names of victim or information that could easily lead to a victim’s identification. Additionally, the University maintains privacy in relation to any accommodations or protective measures afforded to a victim, except to the extent necessary to provide the accommodations and/or protective measures. Typically, if faculty members or administrators are asked to provide accommodations for a specific student, they are told that such accommodations are necessary under Title IX or the Clery Act, but they are not given any details of the incident, or what kind of incident it is. Irrespective of state law or public records access provisions, information about victims is maintained privately in accordance with Title IX and FERPA. In addition to simultaneous written notification of the results of disciplinary proceedings arising from allegations of dating violence, domestic violence, sexual assault, or stalking, the institution will, upon written request, disclose to the alleged victim of a crime of violence or non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by such institution against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased as a result of such crime or offense, the information may be released to the next of kin.

The Role of Advisors/Support Persons

All Parties are entitled to an advisor of their choosing to guide and accompany them throughout the campus resolution process. The advisor may be a friend, mentor, family member, attorney or any other supporter. However, a witness may not also serve as advisor/support person.

The Parties are entitled to be accompanied by their advisor in all meetings and interviews at which the party is entitled to be present, including intake, interviews, and hearings. Advisors should help their advisees prepare for each meeting, and are expected to advise ethically, with integrity and in good faith. The University cannot guarantee equal advisory rights, meaning that if one party selects an advisor who is an attorney, but the other party does not, or cannot afford an attorney, the University is not obligated to provide one.

All advisors are subject to the same rules, whether they are attorneys or not. Advisors may not address campus officials in a meeting, interview or hearing unless invited to. Advisors may confer quietly with their advisees as necessary, as long as they do not disrupt the process. For longer or more involved discussions, the Parties and their advisors should ask for breaks or step out of meetings to allow for private conversation. Advisors are expected to refrain from interference with the University investigation and resolution. Any advisor who steps out of their role in any meeting under the campus resolution process will be warned once and only once. If the advisor continues to disrupt or otherwise fails to respect the limits of the advisor role, the advisor will be asked to leave the meeting. When an advisor is removed from a meeting, that meeting will typically continue without the advisor present. Subsequently, the Title IX Coordinator or a Deputy will determine whether the advisor may be reinstated, may be replaced by a different advisor, or whether the party will forfeit the right to an advisor for the remainder of the process.

The University expects that the Parties will wish to share documentation related to the allegations with their advisors. The University provides a consent form that authorizes such sharing. The Parties must complete this form before the University is able to share records with an advisor. Advisors are expected to maintain the privacy of the records shared with them. These records may not be shared with 3rd Parties, disclosed publicly, or used for purposes not explicitly authorized by the University. The University will restrict the role of any advisor who does not respect the sensitive nature of the process or who fails to abide by the University’s privacy expectations.

The University expects an advisor to adjust their schedule to allow them to attend University meetings when scheduled. The University does not typically change scheduled meetings to accommodate an advisor’s inability to attend. The University will, however make provisions to allow an advisor who cannot attend in person to attend a meeting by telephone, video and/or virtual meeting technologies as may be convenient and available. A party may elect to change advisors during the process, and is not locked into using the same advisor throughout.

Both Title IX and the Clery Act provide protections for whistleblowers who bring allegations of non-compliance with the Clery Act and/or Title IX to the attention of appropriate campus administrators. Grand Canyon University does not retaliate against those who raise concerns of non-compliance. Any concerns should be brought to the immediate attention of the campus Title IX Coordinator and/or to officials of the U.S. Department of Education.
NOTICE OF NON-DISCRIMINATION

Grand Canyon University does not discriminate on the basis of race, color, national or ethnic origin, sex, disability, age, sexual orientation, gender identity or any legally protected status. Title IX regulations require non-discrimination on the basis of sex or gender, which includes unlawful discrimination based on pregnancy and/or disability discrimination based upon complications related to pregnancy. As a religious institution, Grand Canyon University expressly reserves its rights, its understandings of, and its commitments to Christian principles, and reserves the legal right to hire and employ individuals who support the values of the University.

Title IX Coordinator

Shanna Milonas, MBA
Assistant Vice President of Academic Compliance
Title IX and 504 Coordinator
3300 W. Camelback Road
Phoenix, AZ 85017
602-639-5900
TitleIX@gcu.edu

U.S. Department of Education Office for Civil Rights

Lyndon Baines Johnson, Department of Education Building
400 Maryland Avenue, SW
Washington, DC 20202-1100
Telephone: 800-421-3481
FAX: 202-453-6012; TDD: 800-877-8339
OCR@ed.gov

GRAND CANYON UNIVERSITY POLICIES GOVERNING ALCOHOL AND DRUGS

Grand Canyon University is committed to providing a drug-free campus and workplace environment. As an institution of higher education, the university recognizes the need to establish a drug and alcohol awareness program to educate faculty, staff and students about the dangers of drug and alcohol abuse. This policy is established as required by the Drug-Free Workplace Act of 1988 and the Drug-Free Schools and Communities Act of 1989.

The sale, offer to sell, purchase, use, transfer, possession and/or manufacture of illegal drugs, including marijuana (medical or otherwise) and alcohol, are strictly prohibited on University property where residence halls are located. This also includes parking lots, cafeterias, and other non-work related areas. Except as specifically authorized by senior management, employees may not unlawfully possess, consume or be under the influence of alcohol while working, participating in Grand Canyon University events, or present on University Premises. (Alcohol may be available for purchase at Grand Canyon University Golf Course and Grand Canyon University’s Canyon 49 Restaurant located off of main campus)

Local, state, and federal laws make illegal use of drugs and alcohol serious crimes. Conviction can lead to imprisonment, fines and assigned community service. Grand Canyon University Police investigate all cases of drug possession and underage alcohol possession/consumption. Where probable cause exists, cases are forwarded to the Maricopa County Attorney’s Office for prosecution. Additionally, sanctions will be imposed on students or employees who violate the University drug and/or alcohol policies. Sanctions for students may include suspension or expulsion, community service hours, mandated alcohol and drug awareness training and for employees, disciplinary action up to and including immediate termination of employment and referral for criminal prosecution. Grand Canyon University’s Drug-Free Campus and Workplace Policy can be viewed at the following link: https://www.gcu.edu/sites/default/files/media/Documents/University-Handbooks/2019-20/-University-Policy-Handbook-.pdf

More information about alcohol and drugs and the risks they pose to health is available in the Campus Health & Wellness Center. Outside counseling services and support groups are available. The following is a partial list of these resources:

- Alcoholics Anonymous: 602-264-1341
ANNUAL DISCLOSURE OF CRIME STATISTICS

Clery Act Crimes

Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (20 USC § 1092(f)) requires colleges and universities to disclose information about crime on and around their campuses. The University Public Safety Department discloses the Clery crime statistics in the following charts through a number of methods.

In addition to the crime data the University Public Safety department maintains, the University collects Clery crimes statistics of reports made to various campus security authorities, as defined in this report. The statistics reported in the following charts generally reflect the number of criminal incidents reported to the various campus security authorities. The statistics reported for the subcategories on liquor law, drug laws, and weapons offenses represent the number of people arrested or referred to campus authorities for respective violations, not the number of offenses documented.

Definitions of Reportable Crimes

- Murder/Non-negligent Manslaughter – defined as the willful (non-negligent) killing of one human being by another.
- Manslaughter by Negligence – defined as the killing of another person through gross negligence.
- Robbery – defined as taking or attempting to take anything of value from the car, custody, or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.
- Aggravated Assault – defined as an unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm.
- Burglary – unlawful entry of a structure to commit a felony or a theft.
- Motor Vehicle Theft – theft or attempted theft of a motor vehicle. (Classify as motor vehicle theft all cases where automobiles are taken by persons not having lawful access even though the vehicles are later abandoned- including joyriding.)
- Arson – any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property of another, etc.
- Sexual Offenses – any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent.
  - Rape – the penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.
  - Fondling – the touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.
  - Incest – Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
  - Statutory Rape – sexual intercourse with a person who is under the statutory age of consent.
- Domestic Violence – a felony or misdemeanor crime of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of jurisdiction in which the crime of violence occurred, by any person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.
• **Dating Violence** – violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; where the existence of such a relationship is determined based on a consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.

• **Stalking** – Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for his or her safety or the safety of other; or suffer substantial emotional distress.

• **Hate Crimes** – is a criminal offense that manifest evidence that the victim was intentionally selected because of the perpetrator’s bias against the victim. For Clery purposes, Hate Crimes include the following classifications: murder and non-negligent manslaughter, sexual assault, robbery, aggravated assault, burglary, motor vehicle theft, and arson (previously defined) and larceny-theft, simple assault, intimidation, destruction/damage/vandalism of property (defined below).

• **Larceny/Theft** – unlawful taking, carrying, leading or riding away of property from the possession or constructive possession of another.

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

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

• **Destruction/Damage/Vandalism to Property** – to willfully or maliciously destroy, damage, deface, or otherwise injure real or personal property without the consent of the owner or the person having custody or control of it.

**Categories of Prejudice**

• **Race** – A preformed negative attitude toward a group of persons who possess common physical characteristics genetically transmitted by descent and heredity that distinguish them as a distinct division of humankind.

• **Religion** – A preformed negative opinion or attitude toward a group of persons who share the same religious beliefs regarding the origin and purpose of the universe and the existence or nonexistence of a supreme being.

• **Sexual Orientation** – A preformed negative opinion or attitude toward a group of persons based on their actual or perceived sexual orientation.

• **Gender** – A preformed negative opinion or attitude toward a group of persons based on their actual or perceived gender.

• **Gender Identity** – A preformed negative opinion or attitude toward a group of persons based on their actual or perceived gender identity.

• **Ethnicity** – A preformed negative opinion or attitude toward a group of people whose members identify with each other, through common heritage, often consisting of a common language, common culture (often including a shared religion) and/or ideology that stresses common ancestry.

• **National Origin** – A preformed negative opinion or attitude toward a group of people based on their actual or perceived country of birth.

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

**Additional Definitions**

• **Awareness programs** – Community-wide or audience specific programming, initiatives, and strategies that increase audience knowledge and share information and resources to prevent violence, promote safety, and reduce perpetration.

• **Bystander intervention** – safe and positive options that may be carried out by an individual or individuals to prevent harm or intervene when there is a risk of dating violence, domestic violence, sexual assault, or stalking.

• **Consent** – an understandable exchange of affirmative words or actions, as long as those words or actions create mutually understandable clear permission regarding willingness to engage in (and the conditions of) sexual activity.

• **Ongoing prevention and awareness campaigns** – programming, initiative, and strategies that are sustained over time and focus on increasing understanding of topics relevant to and skills for addressing dating violence, domestic violence, sexual assault, and stalking, using a range of strategies with audiences throughout the institution.

• **Primary prevention programs** – programming, initiatives and strategies informed by research or assessed for value, effectiveness, or outcome that are intended to stop dating violence, domestic violence, sexual assault, and stalking before they occur through the promotion of positive and healthy behaviors that foster healthy, mutually respectful relationships and sexuality, encourage safe bystander intervention, and seek to change behavior and social norms in healthy and safe direction.
• **Risk reduction** – options designed to decrease perpetration and bystander inaction, and to increase empowerment for victims in order to promote safety and to help individuals and communities address conditions that facilitate violence.

• **Proceeding** – all activities related to a non-criminal resolution of an institution disciplinary complaint, including, but not limited to, fact finding investigations, formal or informal meetings, and hearings.

• **Result** – any initial, interim, and final decision by any official or entity authorized to resolve disciplinary matters within the institution.

### Unfounded Crimes

Pursuant to the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act) regulations, an institution may withhold, or subsequently remove, a reported crime from its crime statistics in the rare situation where sworn or commissioned law enforcement personnel have fully investigated the reported crime and, based on the results of this full investigation and evidence, have made a formal determination that the crime report is false or baseless and therefore “unfounded.” Only sworn or commissioned law enforcement personnel may “unfound” a crime report. The recovery of stolen property, the low value of stolen property, refusal of the victim to cooperate with the prosecution, and the failure to make an arrest do not “unfound” a crime report.

<table>
<thead>
<tr>
<th>Year</th>
<th>Number of Unfounded Crime Reports</th>
<th>Unfounded Crime Reports Withheld From Statistics</th>
</tr>
</thead>
<tbody>
<tr>
<td>2018</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>2017</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>2016</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Criminal Offenses</td>
<td>On-Campus Property</td>
<td>Public Property</td>
</tr>
<tr>
<td>-----------------------------------</td>
<td>--------------------</td>
<td>-----------------</td>
</tr>
<tr>
<td></td>
<td>Student Housing</td>
<td>Total On-Campus</td>
</tr>
</tbody>
</table>

*Non Campus statistics include crimes reported at locations away from main campus. These locations may include hotels used for school sponsored trips and other “away” trips and activities. Statistics may include Clery reportable crimes that occurred anywhere in or on the locations physical address and may or may not have had any involvement with GCU students.
### VAWA Offenses

<table>
<thead>
<tr>
<th>VAWA Offenses</th>
<th>On-Campus Property</th>
<th>Public Property</th>
<th>Non-Campus</th>
<th>Unfounded</th>
</tr>
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<tr>
<td></td>
<td>Student Housing</td>
<td>Total On-Campus</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Domestic Violence</td>
<td>2018</td>
<td>4</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>2017</td>
<td>1</td>
<td>0</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>2016</td>
<td>2</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Dating Violence</td>
<td>2018</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>2017</td>
<td>0</td>
<td>3</td>
<td>0</td>
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<tr>
<td></td>
<td>2016</td>
<td>1</td>
<td>3</td>
<td>0</td>
</tr>
<tr>
<td>Stalking</td>
<td>2018</td>
<td>3</td>
<td>9</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>2017</td>
<td>0</td>
<td>3</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>2016</td>
<td>2</td>
<td>5</td>
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### Arrests

<table>
<thead>
<tr>
<th>Arrests</th>
<th>On-Campus Property</th>
<th>Public Property</th>
<th>Non-Campus</th>
<th>Unfounded</th>
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<td></td>
<td>Student Housing</td>
<td>Total On-Campus</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Weapons: Carrying, Possessing, etc.</td>
<td>2018</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>2017</td>
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<td>0</td>
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<tr>
<td></td>
<td>2016</td>
<td>0</td>
<td>0</td>
<td>0</td>
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<tr>
<td>Drug Abuse Violations</td>
<td>2018</td>
<td>92</td>
<td>105</td>
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<tr>
<td></td>
<td>2017</td>
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<td></td>
<td>2016</td>
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<tr>
<td>Liquor Law Violations</td>
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<td>0</td>
<td>0</td>
<td>0</td>
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<tr>
<td></td>
<td>2017</td>
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<tr>
<td></td>
<td>2016</td>
<td>7</td>
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### Disciplinary Actions

<table>
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<th>Disciplinary Actions</th>
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<th>Public Property</th>
<th>Non-Campus</th>
<th>Unfounded</th>
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<tr>
<td></td>
<td>Student Housing</td>
<td>Total On-Campus</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Weapons: Carrying, Possessing, etc.</td>
<td>2018</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>2017</td>
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<td>0</td>
<td>0</td>
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<tr>
<td></td>
<td>2016</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Drug Abuse Violations</td>
<td>2018</td>
<td>106</td>
<td>120</td>
<td>0</td>
</tr>
<tr>
<td></td>
<td>2017</td>
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<td></td>
<td>2016</td>
<td>11</td>
<td>45</td>
<td>0</td>
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<tr>
<td>Liquor Law Violations</td>
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<td>390</td>
<td>0</td>
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<td></td>
<td>2017</td>
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<td></td>
<td>2016</td>
<td>200</td>
<td>231</td>
<td>0</td>
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<tr>
<td>Hate Crimes</td>
<td>On-Campus Property</td>
<td></td>
<td>Public Property</td>
<td>Non-Campus</td>
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<tr>
<td>-----------------------------------</td>
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</tr>
<tr>
<td></td>
<td></td>
<td>Student Housing</td>
<td>Total On-Campus</td>
<td></td>
</tr>
<tr>
<td>Murder / Non-Negligent Manslaughter</td>
<td>2018</td>
<td>0</td>
<td>0</td>
<td>0</td>
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† Hate Crime Key: (D) Disability (E) Ethnicity (Ra) Race (Re) Religion (S) Sexual Orientation (G) Gender (N) National Origin (GI) Gender Identity