GRAND CANYON UNIVERSITY®

2020 ANNUAL SECURITY REPORT

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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 25 sworn Police Officers, 169 full time security personnel, 47 part time event security personnel, and 48 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

Grand Canyon University does not have any officially recognized student organizations that own or control housing facilities outside the University's core campus or within the campus that meet the definition of non-campus locations.

REPORTING CRIMES AND OTHER EMERGENCIES

The University has several 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 all crimes accurately and promptly, participate in and support crime prevention efforts and report all 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

The university encourages the accurate and prompt reporting of all crimes to campus law enforcement and to the appropriate police agencies, when the victim of a crime elects to, or is unable to, make such a report. 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 – 5:00pm 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."[1]

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:

[1] U.S. Department of Education – The Handbook for Campus Safety and Security Reporting, 2016 Edition, pg. 4-2

Official Campus Location and Phone Number
Department of Public Safety
The Grove Garage, Building 80
602-639-8100

For Title IX concerns, contact:
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 athletics:
Jamie Boggs, Director of Athletics
Building 26
602-639-6611

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[2] 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

[2] U.S. Department of Education – The Handbook for Campus Safety and Security Reporting, 2016 Edition, pg. 4-7

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).

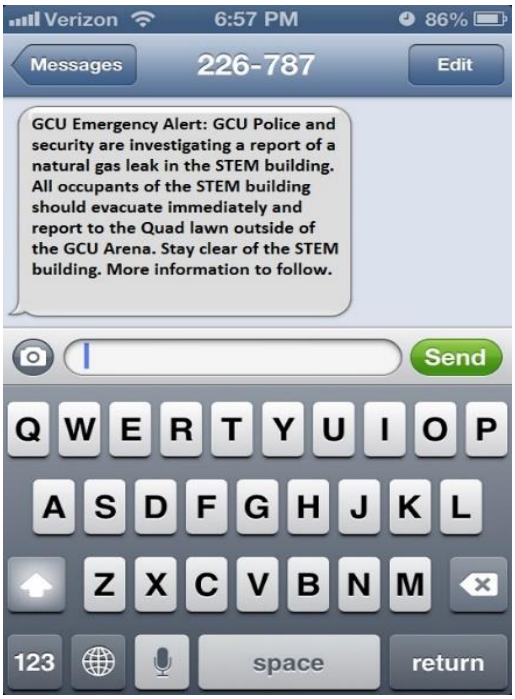
The Environmental Health and Safety Department develops and distributes emergency response procedures to students and employees. These procedures are maintained and distributed during various training sessions conducted throughout the year.

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-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/

For more information about timely warnings and emergency notifications please visit 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 first. 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 it's 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 6:00am until 10:00pm 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 a.m. - 5 p.m. 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:

Active Threats Response Training: Active threats are often unpredictable and evolve quickly. Grand Canyon University takes the safety and security of our students, staff, and visitors very seriously. The best way to keep safe is to know what to do in these unfortunate situations. The Active Threats Response Training is mandatory for all GCU employees on an annual basis.

Bystander Intervention Training: The voluntary training assists learners in identifying mental health and emotional struggles in others and is specifically for populations that do not have advanced training in human psychology. This course is offered in an online training module and is available at any time.

Bicycle Theft Reduction/Registration Program: GCU Police Officers offer a bicycle registration program for all GCU students. Identification numbers are assigned to students bicycles in order to prevent theft and assist in the recovery of stolen bicycles on campus. Students are provided theft prevention strategies when registering their bicycles. This service is available year-round at any time.

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. Certification is available on an as needed basis.

CPR/First Aid: This class is mandatory upon hire for all Public Safety, Environmental Health and Safety and select Residence Life and Athletics Department members. Annual recertification is also mandatory.

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 sexual harassment, which is the umbrella category including the offenses of sexual harassment, sexual assault, stalking, and dating and domestic violence. Grand Canyon University utilizes the standards and definitions mandated through the revised Title IX regulations, codified in 34 C.F.R. Part 106. Although the standards and definitions are different 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:

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 a specific form of discriminatory harassment and an unlawful discriminatory practice. Acts of sexual harassment may be committed by any person upon any other person, regardless of the sex of those involved. Sexual Harassment, as an umbrella category, includes the offenses of sexual harassment, sexual assault, domestic violence, dating violence, and stalking, and is defined as:

Conduct on the basis of sex that satisfies one or more of the following:

1) Quid Pro Quo:
   An employee of the University conditions the provision of an aid, benefit, or service of the University on an individual's participation in unwelcome sexual conduct; and/or

2) Sexual Harassment:
   Unwelcome conduct, determined by a reasonable person, to be so severe, and pervasive, and, objectively offensive, that it effectively denies a person equal access to the University's education program or activity. Unwelcomeness is subjective and determined by the Complainant (except when the Complainant is below the age of consent). Severity, pervasiveness, and objective offensiveness are evaluated based on the totality of the circumstances from the perspective of a reasonable person in the same or similar circumstances.

3) Sexual assault, defined as:
   a) Sex Offenses, Forcible: Any sexual act directed against another person, without the consent of the Complainant, including instances in which the Complainant is incapable of giving consent.
   b) Forcible Rape: Penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the Complainant.

c) Forcible Sodomy: Oral or anal sexual intercourse with another person that is forcibly committed, and/or against that person's will (non-consensually), or not forcibly or against the person's will in instances in which the Complainant is incapable of giving consent because of age or because of temporary or permanent mental or physical incapacity.
d) Sexual Assault with an Object: The use of an object or instrument to penetrate, however slightly, the genital or anal opening of the body of another person, forcibly, and/or against that person's will (non-consensually), or not forcibly or against the person's will in instances in which the Complainant is incapable of giving consent because of age or because of temporary or permanent mental or physical incapacity.
e) Forcible Fondling: The touching of the private body parts of another person (buttocks, groin, breasts), for the purpose of sexual gratification, forcibly, and/or against that person's will (non-consensually), or not forcibly or against the person's will in instances in which the Complainant is incapable of giving consent because of age or because of temporary or permanent mental or physical incapacity.
f) Sex Offenses, Non-forcible:
    i) Incest: Non-forcible sexual intercourse, between persons who are related to each other, within the degrees wherein marriage is prohibited by Arizona law.
    ii) Statutory Rape: Non-forcible sexual intercourse, with a person who is under the statutory age of consent of Arizona.

4) Dating Violence, defined as: Violence, on the basis of sex, committed by a person, who is in or has been in a social relationship of a romantic or intimate nature with the Complainant.
    a. The existence of such a relationship shall be determined based on the Complainant's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.

    For the purposes of this definition, dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. Dating violence does not include acts covered under the definition of domestic violence.

5) Domestic Violence, defined as: Violence, on the basis of sex, committed by a current or former spouse or intimate partner of the Complainant, by a person with whom the Complainant shares a child in common, or by a person who is cohabitating with, or has cohabitated with, the Complainant as a spouse or intimate partner, or by a person similarly situated to a spouse of the Complainant under the domestic or family violence laws of Arizona, or by any other person against an adult or youth Complainant who is protected from that person's acts under the domestic or family violence laws of Arizona.
    To categorize an incident as Domestic Violence, the relationship between the Respondent and the Complainant must be more than just two people living together as roommates. The people cohabitating must be current or former spouses or have an intimate relationship.

6) Stalking, defined as: Engaging in a course of conduct, on the basis of sex, directed at a specific person, that would cause a reasonable person to fear for the person's safety, or the safety of others; or suffer substantial emotional distress.

For the purposes of this definition, course of conduct means two or more acts, including, but not limited to, acts in which the Respondent directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property. Reasonable person means a reasonable person under similar circumstances and

with similar identities to the Complainant. Substantial emotional distress means significant mental suffering or anguish that may but does not necessarily require medical or other professional treatment or counseling.

Consent-

Knowing, voluntary, clear permission, either by affirmative words or actions, to engage in sexual activity.

- Silence does not necessarily constitute consent.
- Valid consent requires clear words or actions that the other individual consented to that specific sexual conduct. Reasonable reciprocation can be implied.
- Clear communication from the outset is strongly encouraged. If consent is not clearly provided prior to engaging in the activity, consent may be ratified by word or action at some point during the interaction or thereafter.
- Since individuals may experience the same interaction in different ways, it is the responsibility of each party to determine that the other has consented before engaging in the activity.
- Consent can also be withdrawn once given, as long as the withdrawal is reasonably and clearly communicated. If consent is withdrawn, that sexual activity should cease.
- Consent to some sexual contact (such as kissing or fondling) cannot imply consent for other sexual activity (such as intercourse). A current or previous intimate relationship does not sufficiently constitute consent.

Proof of consent or non-consent is not a burden placed on either party involved in an incident. Instead, the burden remains on the University to determine whether its policy has been violated. The existence of consent is based on the totality of the circumstances evaluated from the perspective of a reasonable person in the same or similar circumstances, including the context in which the alleged incident occurred and any similar, previous patterns that may be evidenced.

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 IX and Non-Discrimination Policy, 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

- **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 harassment, sexual misconduct, or the crimes of sexual assault, stalking, dating violence, or domestic violence do occur, the University takes the matter very seriously. In cases where an individualized safety and risk analysis has determined an immediate threat to the physical health or safety of any student, individual, or the community exists, Grand Canyon University may impose the emergency removal of a Respondent. Additionally, the Institutional Access and Compliance 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, Institutional Access and Compliance 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 and Non-Discrimination Policy is 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

Shanna Milonas, MBA
Title IX Coordinator
602-639-5900
titleix@gcu.edu

Kelsey Cross
Deputy Title IX Coordinator
602-639-5900
titleix@gcu.edu

Tim Griffin
Assistant Deputy Title IX Coordinator for Students
602-639-6647
Tim.Griffin@gcu.edu

Jamie Boggs
Assistant Deputy Title IX Coordinator for Athletics
602-639-6611
Jamie.Boggs@gcu.edu

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 -based discrimination or harassment.

Anyone with knowledge about sexual misconduct, sex 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, sex 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.

    - 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.

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 or http://nsopw.gov/Core/Portal.aspx. You may search by city, county of 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 PROCEDURES 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 sex 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 and Non-Discrimination Policy 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.

Upon determination of a finding of responsibility in either the Title IX Hearing Process or Discriminatory Harassment Administrative Resolution Process, the following factors are considered when determining a sanction/responsive action, which may include, but are not limited to:

- The nature, severity of, and circumstances surrounding the violation(s)
- The Respondent's disciplinary history

- Previous allegations or allegations involving similar conduct
- The need for sanctions/responsive actions to bring an end to the discrimination, harassment, and/or retaliation
- The need for sanctions/responsive actions to prevent the future recurrence of discrimination, harassment, and/or retaliation
- The need to remedy the effects of the discrimination, harassment, and/or retaliation on the Complainant and the community
- The impact on the parties
- Any other information deemed relevant by the Decision-maker(s)

The sanctions will be implemented as soon as is feasible, either upon the outcome of any appeal or the expiration of the window to appeal without an appeal being requested. The sanctions described in this policy are not exclusive of, and may be in addition to, other actions taken, or sanctions imposed by external authorities.

a. Student Sanctions

The following are the usual sanctions that may be imposed upon students or organizations singly or in combination:

- *Warning:* A formal statement that the conduct was unacceptable and a warning that further violation of any University policy, procedure, or directive will result in more severe sanctions/responsive actions.
- *Required Counseling:* A mandate to meet with and engage in either University-sponsored or external counseling to better comprehend the misconduct and its effects.
- *Probation:* A written reprimand for violation of institutional policy, providing for more severe disciplinary sanctions if the student or organization is found in violation of any institutional policy, procedure, or directive within a specified period of time. Terms of the probation will be articulated and may include denial of specified social privileges, exclusion from co-curricular activities, exclusion from designated areas of campus, no-contact orders, and/or other measures deemed appropriate.
- *Suspension:* Termination of student status for a defined period and/or until specific criteria are met. After the suspension period is observed, a student is eligible to apply for reinstatement, although reinstatement is not guaranteed.
- *Expulsion:* Termination of student status and revocation of rights to be on campus for any reason or to attend University-sponsored events, for a period of two years. After the expulsion period is observed, a student is eligible to apply for reinstatement, although reinstatement is not guaranteed.
- *Denial of Commencement Participation*: The University may deny or restrict a student participation in commencement activities.
- *Organizational Sanctions*: Deactivation, loss of recognition, loss of some or all privileges for a specified period.
- *Other Actions:* In addition to or in place of the above sanctions, the University may assign any other sanctions as deemed appropriate.

b. Employee Sanctions

Responsive actions for an employee who has engaged in harassment, discrimination, and/or retaliation include disciplinary action, up to and including termination. The University reserves the right to impose

any level of sanction, ranging from a reprimand up to and including suspension or expulsion/termination, for any offense under this policy.

Deliberately false and/or malicious accusations under this policy, as opposed to allegations which, even if erroneous, are made in good faith, are a serious offense and will be subject to appropriate disciplinary action. Additionally, witnesses and parties knowingly providing false evidence, tampering with or destroying evidence after being directed to preserve such evidence, or deliberately misleading an official conducting an investigation can be subject to discipline.

Procedurally, when the University receives a report of sexual misconduct, sex-based violence, or other sex or 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 and Non-Discrimination Policy, 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

All allegations are acted upon promptly upon receipt of notice or a formal complaint. Complaint can take 60-90 business days to resolve, typically. Exceptions and extenuating circumstances can cause a resolution to take longer, but the University will avoid all undue delays within its control. Any time the general timeframes for resolution will be delayed, the University will provide written notice to the parties of the delay, the cause of the delay, and an estimate of the anticipated time that will be needed as a result of the delay.

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.

Notice or complaints of discrimination, harassment, and/or retaliation may be made by filing a complaint with, or giving verbal notice to, the Title IX Coordinator. A report may be made at any time (including during non-business hours) via telephone, email, or mail. Reports may also be made to any mandatory reporter, which will ultimately be referred to the Title IX Coordinator for further processing. Upon receipt of a complaint or notice of an alleged policy violation, the Title IX Coordinator initiates a prompt initial assessment, resulting in at least one of the following responses:

1. Offering supportive measures because the Complainant does not want to proceed formally; and/or
2. An informal resolution; and/or
3. A Formal Grievance Process including an investigation resulting in a hearing or administrative resolution (requires a formal complaint to be filed with the Title IX Coordinator).

A Formal Complaint refers to a document filed/signed by the Complainant or signed by the Title IX Coordinator alleging a policy violation by a Respondent and requesting that the University investigate the allegation(s).

The investigation and grievance process will determine whether the Policy has been violated. If so, the University will promptly implement effective remedies designed to ensure that it is not deliberately indifferent to harassment or discrimination, their potential recurrence, or their effects.

Following intake, receipt of notice, or a complaint of an alleged violation of the Title IX and Non-Discrimination Policy, the Title IX Coordinator engages in an initial assessment, which is typically completed in one to five business days. The steps in an initial assessment can include, but are not limited to:

- The Title IX Coordinator reaches out to the Complainant to offer supportive measures.
- The Title IX Coordinator works with the Complainant to ensure they are aware of the right to have an Advisor.
- The Title IX Coordinator works with the Complainant to determine whether the Complainant prefers a supportive response or an Administrative Resolution.
    - If a supportive and remedial response is preferred, the Title IX Coordinator works with the Complainant to identify their wishes and then seeks to facilitate implementation. A formal grievance process is not initiated, though the Complainant can elect to initiate it later, if desired.
    - If an Informal Resolution option is preferred, the Title IX Coordinator assesses whether the complaint is suitable for informal resolution and may seek to determine if the Respondent is also willing to engage in Informal Resolution.
    - If a formal grievance process is preferred, the Title IX Coordinator first determines if the misconduct alleged falls within the scope of Title IX:
        - If the alleged misconduct falls within the scope of Title IX, the Title IX Coordinator will initiate a formal investigation and the Title IX Hearing Process.
        - If the alleged misconduct does not fall within the scope of Title IX, the Title IX Coordinator will "dismiss" that aspect of the complaint, if any, and refer the matter to a formal investigation and the Discriminatory Harassment Administrative Resolution Process.
        - For both formal resolution processes, the Title IX Coordinator will direct the investigation to address an incident, and/or a pattern of alleged misconduct, and/or a culture/climate issue, based on the nature of the complaint.
- In many cases, the Title IX Coordinator may determine that a Violence Risk Assessment should be conducted by the Threat Assessment Team as part of the initial assessment.

Dismissal (Mandatory and Discretionary)

The University must dismiss a formal complaint or any allegations therein if, at any time during the investigation or hearing, it is determined that:

- The conduct alleged in the formal complaint would not constitute sexual harassment as defined in the Policy, even if proved; and/or
- The conduct did not occur in an educational program or activity controlled by the University, and/or the University does not have control of the Respondent; and/or
- The conduct did not occur against a person in the United States; and/or
- At the time of filing a formal complaint, a Complainant is not participating in or attempting to participate in the education program or activity of the University.

The University may dismiss a formal complaint or any allegations therein if, at any time during the investigation or hearing:

- A Complainant notifies the Title IX Coordinator in writing that the Complainant would like to withdraw the formal complaint or any allegations therein; or
- The Respondent is no longer enrolled in or employed by the University; or
- Specific circumstances prevent the University from gathering evidence sufficient to reach a determination as to the formal complaint or allegations therein.

Upon any dismissal, the University will promptly send written notice of the dismissal and the rationale for doing so simultaneously to the parties. This dismissal decision is appealable by any party under the procedures for appeal below. A Complainant who decides to withdraw a complaint may later request to reinstate it.

Informal Resolution

If either party wishes to initiate an Informal Resolution, they must notify the Title IX Coordinator. If the alleged misconduct falls within the scope of Title IX, a Complainant will be required to submit a formal complaint prior to proceeding with an Informal Resolution. Informal Resolution can include three different approaches:

- When the parties agree to resolve the matter informally, in a manner agreeable to all parties;
- When the Respondent accepts responsibility for violating policy, and desires to accept a sanction and end the resolution process; or
- When the Title IX Coordinator can resolve the matter informally by providing supportive measures to remedy the situation.

It is not necessary to pursue Informal Resolution first in order to pursue a Formal Grievance Process, and any party participating in Informal Resolution can stop the process at any time and begin or resume the Formal Grievance Process. The University will obtain voluntary, written confirmation that all parties wish to resolve the matter through Informal Resolution before proceeding and will not pressure the parties to participate in Informal Resolution.

The Title IX Coordinator may look to the following factors to assess whether Informal Resolution is appropriate:

- The parties' amenability to Informal Resolution;
- Likelihood of potential resolution, taking into account any power dynamics between the parties;
- The parties' motivation to participate;

- Civility of the parties;
- Cleared violence risk assessment/ongoing risk analysis;
- Disciplinary history;
- Whether an emergency removal is needed;
- Complaint complexity;
- Rationality of the parties;

The ultimate determination of whether Informal Resolution is available or successful is to be made by the Title IX Coordinator. The Title IX Coordinator maintains records of any resolution that is reached, and failure to abide by the resolution agreement may result in an appropriate response, including disciplinary actions. Results of complaints resolved by Informal Resolution are not appealable.

Responding Party Admits to Violation

The Respondent may accept responsibility for all or part of the alleged policy violations at any point during the investigation or resolution process. If the Respondent indicates an intent to accept responsibility for all the alleged misconduct, the process will be paused, and the Title IX Coordinator will determine whether Informal Resolution can be used according to the criteria outlined in this policy. If Informal Resolution is applicable, the Title IX Coordinator will determine whether all parties and the University are able to agree on responsibility, sanctions, and/or remedies. If so, the Title IX Coordinator implements the accepted finding that the Respondent is in violation of University policy and implements agreed-upon sanctions and/or remedies, in coordination with other appropriate administrator(s), as necessary.

This result is not subject to appeal once all parties indicate their written assent to all agreed upon terms of resolution. When the parties cannot agree on all terms of resolution, the process will resume at the same point where it was paused.

Resolution Process Pool

The resolution process relies on a pool of administrators ("the Pool") to carry out the process. The Pool members receive annual training; the materials used to train members of the Pool are publicly posted here: www.gcu.edu/titleix.

Pool Member Roles

Members of the Pool can serve in the following roles, at the direction of the Title IX Coordinator:

- To act as an Advisor to the parties
- To serve in a facilitation role in informal resolution
- To serve as a hearing Chair or facilitator (process administrator, no decision-making role)
- To serve as a Decision-maker regarding the complaint
- To serve as an Appeal Decision-maker

Pool Member Appointment

The Title IX Coordinator appoints the Pool, which acts with independence and impartiality. While members of the Pool are typically trained in a variety of skill sets and can rotate amongst the different roles listed above in different cases, the University can also designate permanent roles for individuals in the Pool, using others as substitutes or to provide greater depth of experience when necessary. This process of role

assignment may be the result of particular skills, aptitudes, or talents identified in members of the Pool that make them best suited to particular roles.

Title IX Hearing Process

The Title IX Hearing Process, as described below, applies **only** to qualifying allegations of sexual harassment (including sexual assault, dating violence, domestic violence, and stalking, as defined above) involving students, staff, administrator, or faculty members which fall within the scope of Title IX and do not meet the criteria for dismissal. If any component of the allegation meets these criteria, the Title IX Hearing Process will be utilized in lieu of the Discriminatory Harassment Administrative Resolution Process.

Notice of Investigation and Allegations

The Title IX Coordinator will provide written notice of the investigation and allegations (the "NOIA") to the Respondent upon commencement of the Formal Grievance Process.

The NOIA will include:

- A meaningful summary of all of allegations,
- The identity of the involved parties (if known),
- The precise misconduct being alleged,
- The date and location of the alleged incident(s) (if known),
- The specific policies implicated,
- Information on the ability for each party to have an Advisor of their choosing,
- Details on how the party may request disability accommodations during the interview process,
- The name(s) of the Investigator(s), along with a process to identify, in advance of the interview process, to the Title IX Coordinator any conflict of interest that the Investigator(s) may have,

Amendments and updates to the NOIA may be made as the investigation progresses and more information becomes available regarding the addition or dismissal of various charges.

Evidentiary Considerations

The formal resolution process does not consider: 1) incidents not directly related to the possible violation, unless they evidence a pattern; 2) the character of the parties; or 3) questions and evidence about the Complainant's sexual predisposition or prior sexual behavior, unless such questions and evidence about the Complainant's prior sexual behavior are offered to prove that someone other than the Respondent committed the conduct alleged by the Complainant, or if the questions and evidence concern specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent.

Referral for Hearing

Once the final investigation report is shared with the parties, the Title IX Coordinator will refer the matter for a hearing. The hearing cannot be less than ten (10) business days from the conclusion of the investigation – when the final investigation report is transmitted to the parties and the Decision-maker–unless all parties and the Decision-maker agree to an expedited timeline. The Title IX Coordinator will select an appropriate Chair, and Decision-makers from the Pool.

Hearing Board Composition

The Title IX Coordinator designates a three-member panel from the Pool. One of the three members will be appointed as Chair by the Title IX Coordinator. The Chair serves to facilitate the hearing and decision-making process. The Hearing Board will not have had any previous involvement with the investigation.

Notice of Hearing

Notice of the hearing will be provided to the parties (at least 10 days in advance). The notice will contain:

- A description of the alleged violation(s), a list of all policies allegedly violated, a description of the applicable procedures, and a statement of the potential sanctions/responsive actions that could result.
- The time, date, and location of the hearing and a reminder that attendance is mandatory, superseding all other campus activities.
- Any technology that will be used to facilitate the hearing.
- Information about the option for the live hearing to occur with the parties located in separate rooms using technology that enables the Decision-maker(s) and parties to see and hear a party or witness answering questions. Such a request must be raised with the Title IX Coordinator at least five (5) business days prior to the hearing.
- A list of all those who will attend the hearing, along with an invitation to object to any Decision-maker based on demonstrated bias. This must be raised with the Title IX Coordinator at least two (2) business days prior to the hearing.
- A statement that if any party or witness does not appear at the scheduled hearing, the hearing may be held in their absence, and the party's or witness's testimony and any statements given prior to the hearing will not be considered by the Decision-maker(s). For compelling reasons, hearing may be rescheduled.
- Notification that the parties may have the assistance of an Advisor of their choosing at the hearing and will be required to have one present for any questions they may desire to ask. The party must notify the Title IX Coordinator if they do not have an Advisor, and the University will appoint one. Each party must have an Advisor present. There are no exceptions.
- A copy of all the materials provided to the Decision-maker(s) about the matter, unless they have been provided already.
- An invitation to each party to submit to the Chair an impact statement pre-hearing that the Decision-maker will review during any sanction determination.
- An invitation to contact the Title IX Coordinator to arrange any disability accommodations, language assistance, and/or interpretation services that may be needed at the hearing, at least seven (7) business days prior to the hearing.

Alternative Hearing Participation Options

If a party or parties prefer not to attend or cannot attend the hearing in person, the party should request alternative arrangements from the Title IX Coordinator at least five (5) business days prior to the hearing.

The Title IX Coordinator can arrange to use technology to allow remote testimony without compromising the fairness of the hearing. Remote options may also be needed for witnesses who cannot appear in person. Any witness who cannot attend in person should let the Title IX

know at least five (5) business days prior to the hearing so that appropriate arrangements can be made.

Pre-Hearing Preparation

Any witness scheduled to participate in the hearing must have been first interviewed by the Investigator(s) or have proffered a written statement or answered written questions, unless all parties and the Chair assent to the witness's participation in the hearing. The same holds for any evidence that is first offered at the hearing. If the parties and Chair do not assent to the admission of evidence newly offered at the hearing, the Chair will delay the hearing and instruct that the investigation needs to be re-opened to consider that evidence.

The parties will be given a list of the names of the Decision-maker(s) at least five (5) business days in advance of the hearing. All objections to any Decision-maker must be raised in writing, detailing the rationale for the objection, and must be submitted to the Title IX Coordinator as soon as possible and no later than three days prior to the hearing. Decision-makers will only be removed if the Title IX Coordinator concludes that their bias or conflict of interest precludes an impartial hearing of the allegation(s).

The Decision-maker(s) will receive the investigative materials at least five (5) business days in advance of the hearing. Any Decision-maker who cannot make an objective determination must recuse themselves from the proceedings. If a Decision-maker is unsure of whether a bias or conflict of interest exists, they must raise the concern to the Title IX Coordinator as soon as possible.

Hearing Procedures

Participants at the hearing will include the Chair, the Board members, the Investigator(s) who conducted the investigation, the parties, Advisors to the parties, any called witnesses, the Title IX Coordinator and anyone providing authorized accommodations or assistive services.

The Chair will answer all questions of procedure. Anyone appearing at the hearing to provide information will respond to questions on their own behalf. The Chair will allow witnesses who have relevant information to appear at a portion of the hearing in order to respond to specific questions from the Decision-maker(s) and the parties and will then be excused.

Joint Hearings

In hearings involving more than one Respondent or in which two (2) or more Complainants have accused the same individual of substantially similar conduct, the default procedure will be to hear the allegations jointly. However, the Title IX Coordinator may permit the investigation and/or hearings pertinent to each Respondent to be conducted separately if there is a compelling reason to do so. In joint hearings, separate determinations of responsibility will be made for each Respondent with respect to each alleged policy violation.

The Order of the Hearing – Introductions and Explanation of Procedure

The Chair explains the procedures and introduces the participants. The Chair then conducts the hearing according to the hearing script. At the hearing, recording, witness logistics, party logistics, curation of documents, separation of the parties, and other administrative elements of the hearing process are managed by the Title IX Coordinator.

Investigator Presents the Final Investigation Report

The Investigator(s) will then present a summary of the final investigation report, including items that are contested and those that are not, and will be subject to questioning by the Decision-maker(s) and the parties

(through their Advisors). The Investigator(s) will be present during the entire hearing process, but not during deliberations.

Neither the parties nor the Decision-maker(s) should ask the Investigator(s) their opinions on credibility, recommended findings, or determinations, and the Investigators, Advisors, and parties will refrain from discussion of or questions about these assessments. If such information is introduced, the Chair will direct that it be disregarded.

Testimony and Questioning

Once the Investigator(s) present their report and are questioned, the parties and witnesses may provide relevant information in turn, beginning with the Complainant, and then in the order determined by the Chair. The parties/witnesses will submit to questioning by the Decision-maker(s) and then by the parties through their Advisors ("cross-examination").

All questions are subject to a relevance determination by the Chair. The Advisor will pose the proposed question orally, electronically, or in writing, the proceeding will pause to allow the Chair to consider it, and the Chair will determine whether the question will be permitted, disallowed, or rephrased.

The Chair will then state their decision on the question for the record and advise the party/witness to whom the question was directed, accordingly. The Chair will explain any decision to exclude a question as not relevant, or to reframe it for relevance.

The Chair will limit or disallow questions on the basis that they are irrelevant, unduly repetitious (and thus irrelevant), or abusive. The Chair has final say on all questions and determinations of relevance, subject to any appeal. The Chair may ask advisors to frame why a question is or is not relevant from their perspective but will not entertain argument from the advisors on relevance once the Chair has ruled on a question.

Refusal to Submit to Cross-Examination and Inferences

Cross-examination is an all or nothing proposition, meaning that if any question is refused, no statements of that party or witness are admissible. Only if a party or witness is willing to submit to cross-examination, and answers all questions, will their statements prior to or at the hearing be fully admissible. If a party or witness chooses not to submit to cross-examination at the hearing, either because they do not attend the meeting, or they attend but refuse to participate in questioning, then the Decision-maker(s) may not rely on any prior statement made by that party or witness at the hearing (including those contained in the investigation report) in the ultimate determination of responsibility. The Decision-maker(s) must disregard all statements. Evidence provided that is something other than a statement by the party or witness may be considered.

Whether a party or witness does or does not answer questions from the Decision-maker, their statements will be admissible as long as they are willing to submit to cross-examination questions, even if they are not asked such questions. The Decision-maker(s) may not draw any inference solely from a party's or witness's absence from the hearing or refusal to answer cross-examination or other questions.

If a party's Advisor of choice refuses to comply with the University's established rules of decorum for the hearing, the University may require the party to use a different Advisor. If a University-provided Advisor refuses to comply with the rules of decorum, the University may provide that party with a different Advisor to conduct cross-examination on behalf of that party.

Recording Hearings

Hearings (but not deliberations) are recorded by the University for purposes of review in the event of an appeal. The parties may not record the proceedings and no other unauthorized recordings are permitted. The Decision-maker(s), the parties, their Advisors, and appropriate administrators of the University will be permitted to listen to the recording in a controlled environment determined by the Title IX Coordinator. No person will be given or be allowed to make a copy of the recording without permission of the Title IX Coordinator.

Deliberation, Decision-making, and Standard of Proof

The Decision-maker(s) will deliberate in closed session to determine whether the Respondent is responsible or not responsible for the policy violation(s) in question. A majority vote is required to determine the finding. The preponderance of the evidence standard of proof is used.

The parties may each submit a written impact statement prior to the hearing for the consideration of the Decision-maker(s) at the sanction stage of the process when a determination of responsibility is reached. When there is a finding of responsibility on one or more of the allegations, the Decision-maker(s) may then consider the submitted party impact statements and any pertinent conduct history in determining appropriate sanction(s).

The Chair will then prepare a written deliberation statement and deliver it to the Title IX Coordinator, detailing the determination, rationale, the evidence used in support of its determination, the evidence disregarded, credibility assessments, and any sanctions. This report must be submitted to the Title IX Coordinator within two (2) business days of the end of deliberations.

Discriminatory Harassment Administrative Resolution Process

The Discriminatory Harassment Administrative Resolution Process, as described below, applies to all allegations of harassment or discrimination based on protected class status, involving students, staff, faculty members, or third-parties, that are not eligible for resolution under the Title IX Hearing Process. At any point during the initial assessment or formal investigation, if the Title IX Coordinator determines that reasonable cause does not support the conclusion that policy has been violated, the process will end, and the parties will be notified.

Notice of Investigation

If the Administrative Resolution Process is initiated, the Title IX Coordinator will provide written notification of the investigation to the parties, as applicable, at an appropriate time during the investigation. Notification will include a meaningful summary of the allegations made in writing. The notification will include the policies allegedly violated, if known at the time. The policies allegedly violated can be modified, in writing, as the investigation progresses, and details become clearer.

Investigation and Resolution

The investigation will commence in accordance with the process described in the preceding “Steps in the Investigation Process.” Upon conclusion of the investigation, the Title IX Coordinator appoints a three-member decision-maker panel from the Pool members to review the investigative materials and all responses. The appointed decision-makers will conduct a thorough review and evaluate the totality of circumstances based on the preponderance of the evidence within 10 business days.

Right to an Advisor

The parties may each have an Advisor of their choice present with them for all meetings and interviews within the resolution process, if they so choose. The Advisor may be a friend, mentor, family member, attorney, or any other individual a party chooses to advise, support, and/or consult with them throughout the resolution process. The parties may select whomever they wish to serve as their Advisor, from inside or outside of the University community, as long as the Advisor is eligible and available.

Choosing an Advisor who is also a witness in the process creates potential for bias and conflict-of-interest. A party who chooses an Advisor who is also a witness can anticipate that issues of potential bias will be explored by the hearing Decision-maker(s).

Advisor's Role

The parties may be accompanied by their Advisor in all meetings and interviews. Advisors should help the parties prepare for each meeting and are expected to advise ethically, with integrity, and in good faith. The parties are expected to ask and respond to questions on their own behalf throughout the investigation phase of the resolution process. Advisors may consult with their advisee, either privately as needed, or by conferring or passing notes during any resolution process meeting or interview. For longer or more involved discussions, the parties and their Advisors should ask for breaks to allow for private consultation.

Sharing Information with the Advisor

The University expects that the Parties will wish to share documentation and evidence 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 will not comply with requests that all communication be made through a Party's Advisor.

Expectations of an Advisor

The University generally expects an Advisor to adjust their schedule to allow them to attend investigation meetings when planned, but may change scheduled meetings to accommodate an Advisor's inability to attend, if doing so does not cause an unreasonable delay. The University may also make reasonable provisions to allow an Advisor who cannot attend in person to attend a meeting by telephone, video conferencing, or other similar technologies as may be convenient and available.

Expectations of the Parties with Respect to Advisors

A party may elect to change Advisors during the process and is not obligated to use the same Advisor throughout. The parties are expected to inform the Investigator(s) of the identity of their Advisor at least two (2) business days before the date of any meeting or hearing (or as soon as possible if a more expeditious meeting is necessary or desired). The parties are expected to provide timely notice to the Title IX Coordinator if they change Advisors at any time. It is assumed that if a party changes Advisors, consent to share information with the previous Advisor is terminated, and a release for the new Advisor must be secured.

Advisors in Title IX Hearings/University-Appointed Advisor

Title IX regulations require cross-examination during a hearing to be conducted by the parties' Advisors. The parties are not permitted to directly cross-examine each other or any witnesses. If a party does not have an Advisor for a hearing, the University will appoint a trained Advisor for the limited purpose of conducting any cross-examination. 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 an attorney.

A party may reject this appointment and choose their own Advisor, but they may not proceed without an Advisor. If the party's Advisor will not conduct cross-examination, the University will appoint an Advisor who will do so, regardless of the participation or non-participation of the advised party in the hearing itself. Extensive questioning of the parties and witnesses may also be conducted by the Decision-maker(s) during the hearing.

An Advisor may not be called as a witness at a hearing to testify to what their advisee has told them during their role as an Advisor unless the party being advised consents to that information being shared. It is otherwise considered off-limits, and an Advisor who is an institutional employee is temporarily alleviated from mandated reporter responsibilities related to their interaction with their advisee during the resolution process.

Advisor Violations of University Policy

Any Advisor who oversteps their role as defined by this policy will be warned only once. If the Advisor continues to disrupt or otherwise fails to respect the limits of the Advisor role, the meeting will be ended, or other appropriate measures implemented. Subsequently, the Title IX Coordinator will determine how to address the Advisor's non-compliance and future role.

All Advisors are subject to the same University policies and procedures, whether they are attorneys or not. Advisors are expected to advise their advisees without disrupting proceedings. The Advisor may not make a presentation or represent their advisee during any meeting or proceeding and may not speak on behalf of the advisee to the Investigator(s) or other Decision-maker(s) except during cross-examination in a Title IX hearing proceeding

Appeals

All requests for appeal consideration must be submitted in writing to the Title IX Coordinator within 5 business days of the delivery of the Notice of Outcome. Any party may appeal the findings only under the grounds described below.

- A procedural error or omission occurred that significantly impacted the outcome of the hearing (e.g., substantiated bias, material deviation from established procedures, etc).
- To consider new evidence, unknown or unavailable during the investigation, that could substantially impact the original finding or sanction. A summary of this new evidence and its potential impact must be included.
- The sanctions imposed fall outside the range of sanctions the University has designated for this offense.

Upon receipt of an appeal, the appropriate decision-maker(s) will review the request to determine if it meets the grounds for appeal. If the appeal does not meet the established criteria, the request will be denied and

the parties will be notified in writing of the denial and the rationale. If the request does meet the established appeal criteria, the decision-maker(s) will be provided all the documentation and materials used to make the initial determination. Appeals are not intended to be full re-hearings of the allegation(s). In most cases, appeals are confined to a review of documentation or record of the investigation pertinent to the grounds for appeal.

The appeal decision-maker(s) will typically issue the determination within 5 business days of receipt of the accepted appeal. A Notice of Appeal Outcome will be sent to all parties simultaneously including the decision on each ground for appeal and rationale for each decision.

Appeal Considerations

- Any sanctions imposed as a result of the hearing are postponed during the appeal process. Supportive measures may be reinstated.
- Decisions on appeal are to be deferential to the original decision, making changes to the finding only when there is clear error and to the sanction(s)/responsive action(s) only if there is a compelling justification to do so.
- Appeal decision-makers have the authority to apply any administrative resolution necessary based on the merits of an approved appeal, up to and including overturning a decision or sanction, fully or in part.
- In cases where new evidence is presented which warrants further review, the appeal timeframe may be extended. The parties will be notified of any such delays.
- An appeal decision is the final determination of the University.

NOTICE OF NON-DISCRIMINATION

Grand Canyon University, while reserving its lawful rights where appropriate to take actions designed to ensure and promote the Christian principles that sustain its mission and heritage, prohibits unlawful discrimination, including any form of harassment and/or retaliation, on the basis of age, disability, national origin, race, color, religion, sex, pregnancy, veteran status, or any other classification protected by applicable law, in its employment, admissions policies, educational programs, or activities. It is the purpose of the University to pursue the very highest and academic standards within a context that celebrates and extends the spiritual and ethical ideals of the Christian faith. This policy also complies with the Title IX requirements related to non-discrimination.

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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
- Al-Anon and Ala-teen Information: 602-249-1257
- Alcohol and Drug Abuse Hotline: 800-444-9999
- Alcohol and Drug Recovery Center: 888-978-3685
- Drug Addiction Treatment Center: 602-535-6468
- Crossroads (Drug and Alcohol Recovery): 602-249-8002
- Teen Challenge: 602-271-4081
- Terros, Inc.: 602-685-6000

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 performed 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.

Year	Number of Unfounded Crime Reports
2019	3
2018	0
2017	0

Criminal Offenses		On-Campus Property		Public Property	Non-Campus	Unfounded
		Student Housing	Total On-Campus			
Murder / Non-Negligent Manslaughter	2019	0	0	0	0	0
	2018	0	0	0	0	0
	2017	0	0	0	0	0
Manslaughter by Negligence	2019	0	0	0	0	0
	2018	0	0	0	0	0
	2017	0	0	0	0	0
Rape	2019	12	12	0	0	0
	2018	6	9	0	0	0
	2017	12	13	0	0	0
Fondling	2019	2	4	0	0	2
	2018	14	18	0	0	0
	2017	4	5	0	0	0
Incest	2018	0	0	0	0	0
	2017	0	0	0	0	0
	2016	0	0	0	0	0
Statutory Rape	2019	0	0	0	0	0
	2018	0	0	0	0	0
	2017	0	0	0	0	0
Robbery	2019	1	1	0	0	0
	2018	0	0	0	0	0
	2017	0	0	0	0	0
Aggravated Assault	2019	0	1	0	0	0
	2018	1	2	0	0	0
	2017	0	1	0	0	0
Burglary	2019	9	12	0	0	0
	2018	8	10	0	0	0
	2017	17	19	0	3	0
Motor Vehicle Theft	2019	0	4	0	2	0
	2018	0	7	0	0	0
	2017	0	9	0	7	0
Arson	2019	0	0	0	0	0
	2018	1	1	0	0	0
	2017	1	1	0	0	0

VAWA Offenses		On-Campus Property		Public Property	Non-Campus	Unfounded
		Student Housing	Total On-Campus			
Domestic Violence	2019	3	5	0	0	0
	2018	2	4	0	0	0
	2017	1	1	0	3	0
Dating Violence	2019	2	2	0	0	0
	2018	1	1	0	0	0
	2017	0	3	0	0	0
Stalking	2019	2	5	0	0	1
	2018	3	9	0	0	0
	2017	0	3	0	0	0

Arrests		On-Campus Property		Public Property	Non-Campus	Unfounded
		Student Housing	Total On-Campus			
Weapons: Carrying, Possessing, etc.	2019	0	0	0	0	0
	2018	0	0	0	0	0
	2017	0	0	0	0	0
Drug Abuse Violations	2019	100	134	1	0	0
	2018	99	113	0	1	0
	2017	43	84	0	2	0
Liquor Law Violations	2019	0	1	0	0	0
	2018	0	0	0	0	0
	2017	3	10	0	1	0

Disciplinary Actions		On-Campus Property		Public Property	Non-Campus	Unfounded
		Student Housing	Total On-Campus			
Weapons: Carrying, Possessing, etc.	2019	0	0	0	0	0
	2018	0	0	0	0	0
	2017	0	0	0	0	0
Drug Abuse Violations	2019	60	75	0	0	0
	2018	100	113	0	0	0
	2017	68	125	0	0	0
Liquor Law Violations	2019	464	493	0	0	0
	2018	363	389	0	0	0
	2017	416	462	0	0	0

Hate Crimes		On-Campus Property		Public Property	Non-Campus	Unfounded
		Student Housing	Total On-Campus			
Murder / Non-Negligent Manslaughter	2019	0	0	0	0	0
	2018	0	0	0	0	0
	2017	0	0	0	0	0
Manslaughter by Negligence	2019	0	0	0	0	0
	2018	0	0	0	0	0
	2017	0	0	0	0	0
Rape	2019	0	0	0	0	0
	2018	0	0	0	0	0
	2017	0	0	0	0	0
Fondling	2019	0	0	0	0	0
	2018	0	0	0	0	0
	2017	0	0	0	0	0
Incest	2019	0	0	0	0	0
	2018	0	0	0	0	0
	2017	0	0	0	0	0
Statutory Rape	2019	0	0	0	0	0
	2018	0	0	0	0	0
	2017	0	0	0	0	0
Robbery	2019	0	0	0	0	0
	2018	0	0	0	0	0
	2017	0	0	0	0	0
Aggravated Assault	2019	0	0	0	0	0
	2018	0	0	0	0	0
	2017	0	0	0	0	0
Burglary	2019	0	0	0	0	0
	2018	0	0	0	0	0
	2017	0	0	0	0	0
Motor Vehicle Theft	2019	0	0	0	0	0
	2018	0	0	0	0	0
	2017	0	0	0	0	0
Arson	2019	0	0	0	0	0
	2018	0	0	0	0	0
	2017	0	0	0	0	0
Simple Assault	2019	0	0	0	0	0
	2018	0	0	0	0	0
	2017	0	0	0	0	0
Larceny - Theft	2019	0	0	0	0	0
	2018	0	0	0	0	0
	2017	0	0	0	0	0
Intimidation	2019	0	0	0	0	0
	2018	0	0	0	0	0
	2017	0	0	0	0	0
Destruction/Damage Vandalism of Property	2019	0	0	0	0	0
	2018	0	1-S*	0	0	0
	2017	0	0	0	0	0

***Hate Crime Key:** (D) Disability (E) Ethnicity (Ra) Race (Re) Religion (S) Sexual Orientation (G) Gender (N) National Origin (GI) Gender Identity