South University, Richmond

Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Report

Revised September 8, 2026

South University, Richmond (South University) is providing the following information to all of its employees and students as part of South University's commitment to safety and security pursuant to the requirements of the federal Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act. If you should have any questions about any of the information provided in this material, please contact the Campus President at (804) 727-6864.

CAMPUS SECURITY AND CRIME PREVENTION POLICY

South University's Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Report is distributed to every student and employee on an annual basis and is available to prospective employees and students at their request. Employees receive a copy distributed via e-mail. The report is distributed to all students' e-mail. The Report may also be found on the institution's public website, located at:
https://www.southuniversity.edu/-/media/files/richmond/crime-report-richmond.pdf

REPORTING CRIMINAL ACTIONS OR OTHER EMERGENCIES

A safe environment is everyone's responsibility. Students, faculty and staff are encouraged to report all criminal acts, suspicious activities or emergencies promptly and have the right to report these matters confidentially. Victims or witnesses to a crime are encouraged to file a report of the incident. Reports can be filed on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics by contacting the Campus President or any campus security authority. Reports are kept in a secure location in the security office. Names of victims or witnesses are not disclosed in the crime report. It is the policy of South University that all criminal acts or other emergencies be properly documented and reported to local authorities as required by law.

Students and employees should promptly report all criminal actions and emergencies occurring on or around South University facilities to the Campus President either in person or by calling (804) 727-6864. If the Campus President is not available, you may contact the Dean of Students, and Henrico County Police Department by dialing 911 or South University's Campus Security Officer at (804) 727-6874. For a complete listing of all Campus Security Authorities, please see page 2, under Campus Law Enforcement.

In the event of fire or medical emergencies, staff and employees should contact Henrico County Police Department by dialing 911 and then notify Dean of Student Affairs and South University Security.

VICTIM NOTIFICATION

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

POLICIES FOR PREPARING THE ANNUAL DISCLOSURE OF CRIME STATISTICS

All incidents are reported and documented on the Incident Report, which is sent to the Campus President. Reports are kept in a secure location in the security office. The statistics included in the annual crime

report are prepared by compiling campus crime statistics and data from campus security authorities, local police departments, and other relevant information by the Campus President.

SECURITY AND ACCESS TO CAMPUS FACILITIES

It is the policy of South University that access to all campus facilities, be limited to authorized personnel, students, and invited visitors. Visitors are at all times subject to college policies and conduct codes. Students and employees are responsible for the conduct of their guests at all times. Students, staff, and faculty are required to show a valid South University identification card to gain access to campus facilities or services and may be subject to search.

ACCESS TO THE ACADEMIC BUILDINGS

Security Desks are located on the first floor, back entrance. After hours, the building is protected with electronically locked security doors and devices including cameras and proper procedures are followed to ensure limited access to secured areas. Exterior lighting is provided around the building and parking areas, and shrubs and hedges are kept low for safety reasons. Suspicious persons may be questioned or asked to leave by security personnel.

CAMPUS LAW ENFORCEMENT

Persons employed as security personnel on the main campus 2151 Old Brick Road, Glen Allen, VA are provided by security officers furnished by Admiral Security. Security personnel are instructed in security, security problems, specific college rules and regulations, and the proper procedures of how to enforce them. These procedures and rules and regulations are reviewed periodically to ensure that security needs are being met. Security personnel on campus report directly to the Campus President.

Unarmed security personnel at the college are there at the direction of the college, and are to assist students, faculty and staff of South University. Someone is on duty during the hours the building is occupied. They are responsible for ensuring that persons entering the building are employees, students, and their families or invited guests. They are authorized to request identification from those individuals, who are unfamiliar to them, and identification is required of all individuals arriving or leaving after the building is secured. They have the authority to evict unauthorized persons from the premises. Students are advised to carry their South University Photo ID card at all times and to present them upon request. Security personnel may not make arrests, but are instructed to promptly contact Henrico County Police Department and the Campus President if any illegal activity occurs.

Campus Security Authorities at South University include police officers who can make arrests, security officers and any official of the institution who has significant responsibility for student and campus activities, including student discipline, student judicial affairs and student life. The president or his designee may identify other officials as it is deemed necessary. South University Campus Security Authorities are:

Title	Phone
Campus President	(804) 727-6864
Dean of Student Affairs	(804) 727-6858

All members of the campus community are encouraged to report crimes or criminal activity to any of the campus security authorities listed above. This list of Campus Security Authorities is subject to modification, and is not intended to be all inclusive due to changes in responsibilities within the institution.

In accordance with the Clery Act regulations, Campus “Pastoral Counselors” and Campus “Professional Counselors”, when acting as such, are not considered to be a campus security authority and are not required to report crimes for inclusion into the annual disclosure of crime statistics. Students of South University have access to our student assistance program, Be Well at South University, for counseling

needs 24 hours a day, 7 days per week. You can access the service by calling 833-434-1217 or via application, Telehealth, or in-person counseling sessions with a local provider. These are available to you regardless of location, and no insurance is necessary.

The Wellness Hub includes articles and videos on mental health and wellness topics, including mental and emotional health, fitness and nutrition, academic performance, stress management, healthy relationships, and more. To access the Wellness Hub, go to bewellatsouth.com or download the CampusWell app at campuswell.com/get-the-app; the program is easy and confidential.

Be Well at South University Program licensed counselors are available to assist you with balancing school with work and other responsibilities, short-term counseling services, life, and career coaching, medical advocacy, and personal concierge services. Please contact the Dean of Student Affairs with any questions about this service. As a matter of policy, the counselors are encouraged; if and when they deem it appropriate, to inform persons being counseled of the procedures to report crimes on a voluntary, confidential basis for inclusion into the annual crime statistics. To confidentially report a crime, please contact the Dean of Student Affairs at (804) 727-6858 to confidentiality report a crime.

If a student is a victim of a crime and does not want to pursue action with South University's system or the criminal justice system, the student still may want to consider making a confidential report. With the student's permission, the Campus President can file a report on the details of the incident without revealing the student's identity. The purpose of the confidential report is to comply with the student's wish to keep the matter confidential, while taking steps to ensure the safety of the student and that of others. Reports filed in this manner are counted and disclosed in the annual crime statistics for South University. Reports are kept in a secure location in the office of the Campus President.

The Student Affairs office conducts quarterly outreach and individual well-being workshops for you that are designed to increase awareness in areas such as diversity, safety, health and wellness.

For additional information on Student Support Services, please contact the Dean of Students at (804) 727-6858.

South University maintains a Daily Crime Log of all criminal incidents reported to the institution. The *Daily Crime Log* includes the date and time the incident occurred, the nature of the offense, the location of the offense, the offense allegedly committed and the disposition of the complaint if known. The Daily Crime Log is available for public inspection in the Student Affairs office during normal business hours.

RELATIONSHIPS WITH LOCAL AND STATE POLICE

South University is located in Glen Allen, VA. South University maintains close working relationships with the Henrico County Police Department with periodic contact initiated by South University campus security authorities to ensure that the college is aware of criminal offenses and arrests occurring on or near the campus so that they can be properly reported, and if necessary, provide for timely warning reports on crimes that represent a continuing threat. The institution does not have any agreements or memoranda of understanding with law enforcement. The data received from the Henrico County Police Department is maintain in the Student Affairs office.

TIMELY WARNINGS

Timely warnings are provided to give students, faculty, and staff notification of crimes that have occurred on the institution's geographic area and have been reported to campus security authorities or to local police agencies and are considered by the institution to represent a serious or continuing threat to students and employees. Timely warnings are not limited to violent crimes or crimes against person, but may be threats to persons or to property. For example, there may be a rash of burglaries or motor vehicle thefts

that merit a warning because they represent a continuing threat to the campus community.

The decision to issue a timely warning is based on the nature of the crime, the continuing danger to the campus community, and the possible risk of compromising law enforcement efforts. The timely warning should allow the members of the campus community protect themselves. Timely warning reports are provided to the campus community in a variety of ways so that the warning will be able to reach the entire campus community. The timely warning includes information about the crime that triggered the timely warning and all information that will promote safety and that would aid in the prevention of similar crimes. Once South University determines the content of the warning, timely warning reports are provided through a variety of mechanisms, including the emergency notification tool 'My Campus Alert', the student portal site, the school website, email, posters, letters and flyers and digital signage.

Information regarding registration for the My Campus Alert System is available under the section of the Clery Report titled "Emergency Notification" and in the Student Affairs office. Every student can update their My Campus Alert System contact preference via the student portal homepage. Students can do this via the button entitled 'Update Profile / My Campus Alert'.

PROGRAMS TO INFORM STUDENTS ABOUT CAMPUS SECURITY

All new South University employees and students are instructed on crime awareness, prevention and campus security during orientation, and are encouraged to take responsibility for their own security, as well as the security of their fellow classmates. The orientation program, which takes place eight times per year, includes a description of campus security policies and procedures, suggestions on how to avoid becoming a crime victim, evacuation plans at the main campus and procedures for reporting any criminal activity or emergency. Students and employees are also given a safety brochure which gives safety tips for the home, while driving a car, while walking and while on campus. The safety brochure also includes a list of emergency telephone numbers.

In addition South University provides presentations on campus safety and security quarterly. These presentations are open to all students, staff and faculty. The Dean of Students is available quarterly for classroom presentations on campus and work place safety. Student Affairs also coordinates guest speakers upon request from faculty. Local police department presents to student annually.

South University Campus President, as well as Dean of Students, encourage victims or witnesses to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics. However, the names of victims or witnesses who provide information on criminal offenses are not disclosed in the annual disclosure of crime statistics and are maintained by South University in a secure location in the Student Affairs office.

PROGRAMS TO INFORM STUDENTS AND EMPLOYEES ABOUT THE PREVENTION OF CRIMES

South University also provides educational safety programs to the student body. These programs are designed to heighten awareness of crime and its prevention. These educational safety programs are conducted by local law enforcement officials at least two times per year. Topics included in these informational programs are personal safety, living in a city, crime prevention, basic safety, and neighborhood watch programs.

Students are requested to review South University's *Student Handbook* where sections discussing Crime Awareness and Campus Security and Student Conduct Policy can be found. Employees are requested to review South University's *Employee Handbook* where information regarding Standards of Conduct and Safety can be found.

OFF-CAMPUS STUDENT ORGANIZATIONS
At the present time, South University does not have any off-campus student organizations.

DRUG AND ALCOHOL POLICIES
In keeping with section 120(a) through (d) of The Higher Education Act of 1965, as amended, including the Drug-Free Schools and Communities Amendments of 1989 (Public Law 101-226), a "Drug Free Schools and Campuses" publication, the Drug Prevention Policy, is provided to all South University students and employees annually.

Pursuant to federal and state drug laws, employees and students are prohibited from the unlawful manufacture, distribution, possession, sale or use of illicit/illegal drugs. South University also enforces state laws regarding underage drinking. This prohibition applies while on the property of South University or when participating in any institutional activity. Students or employees who violate this policy will be subject to disciplinary action up to, and including, expulsion from South University or termination of employment.

For more information please refer to the Drug and Alcohol Prevention Program and the Drug-Free Workplace and Campus Program.
https://www.southuniversity.edu/-/media/files/richmond/drug-alcohol-policy-richmond.pdf

WEAPONS POLICY
Possession or use of firearms, fireworks, ammunition, or other dangerous weapons or materials is prohibited on South University owned or controlled property, at college-sponsored activities.

PROGRAMS AND PROCEDURES REGARDING SEXUAL VIOLENCE
South University values civility, dignity, education, honesty, and safety and is firmly committed to maintaining a campus environment free from all forms of sex discrimination, sexual harassment, and sexual assault. Sexual Misconduct and Relationship Violence, defined more specifically below, are inconsistent with these values, violate institutional policy, and will not be tolerated at South University and are expressly prohibited. Similarly, retaliation for having brought forward a concern or allegation or for participating in an investigation of a report of Sexual Misconduct or Relationship Violence is also expressly prohibited and is grounds for disciplinary action.

This Policy provides information regarding how an individual - whether a student, faculty member, or staff member - can make a report of Sexual Misconduct or Relationship Violence impacting a student and how South University will proceed once it is made aware of any such report.

For faculty and staff members who believe they are the victim of sexual misconduct, please follow our No Harassment policy in the Employee Handbook.

I. PRELIMINARY ISSUES & IMPORTANT DEFINITIONS
This Policy prohibits "Sexual Misconduct" and "Relationship Violence," broad categories encompassing the conduct defined below. Sexual Misconduct and Relationship Violence can be committed by anyone, including third parties, and can occur between people of the same sex or different sexes and regardless of one's biological sex or transgendered sex. This policy applies to Sexual Misconduct and Relationship Violence that is committed against a student when that Sexual Misconduct or Relationship Violence occurs: (i) on campus; (ii) off-campus if in connection with a University-sponsored program or activity or in student housing; or (iii) off-campus, including at internship/externship/practicum sites if allegedly perpetrated by a fellow student, faculty member, staff member, or third party when the victim/reporting student reasonably believes that the off-campus conduct has created a hostile educational environment.

A. What is "Sexual Misconduct"?
Sexual Misconduct includes:

- Sexual Assault: Having or attempting to have sexual intercourse, cunnilingus, or fellatio without Consent (as defined below). Sexual intercourse is defined as anal or vaginal penetration by a penis, tongue, finger, or inanimate object.
- Non-Consensual Sexual Contact: Any intentional sexual touching with any body part or object by any person upon any person without Consent.
- Sexual Exploitation: An act attempted or committed through the abuse or exploitation of another person's sexuality. Examples include, but are not limited to, prostituting another student; inducing a student into sexual intercourse, sexual contact, or other sexual activity by implicit or explicit threat of exposure of personal information or academic consequences; non-consensual video or audio-taping of sexual activity; allowing others to observe a personal consensual sexual act without the knowledge or Consent of all involved parties; and knowingly transmitting or exposing another person to a sexually transmitted infection without the person's knowledge.
- Indecent Exposure: the exposure of the private or intimate parts of the body in a lewd manner in public or in private premises when the accused may be readily observed.
- Sexual Harassment: unwelcome sexual advances, requests for sexual favors, and other physical or verbal conduct of a sexual nature when it meets any of the following: (a) Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's academic status; or (b) Submission to or rejection of such conduct by an individual is used as the basis for academic decisions affecting such individual; or (c) Such conduct has the purpose or effect of unreasonably interfering with an individual's work or academic performance or creating an intimidating, hostile, or offensive environment for working, learning, or living on campus.

B. What is "Relationship Violence"?
Relationship Violence includes:

- Domestic Violence: Violence, including but not limited to sexual or physical abuse or the threat of such abuse, committed by a current or former spouse or intimate partner or any other person from whom the student is protected under federal or applicable state law.
- Dating Violence: Violence, including but not limited to sexual or physical abuse or the threat of such abuse, committed by a person who is or has been in a social relationship of a romantic or intimate nature with the alleged victim. The existence of such a relationship is generally determined based on a consideration of the length and type of relationship and the frequency of interaction.
- Stalking: A course of conduct directed at a specific person that would cause a reasonable person to fear for their own safety or the safety of others or suffer substantial emotional distress. A course of conduct means two or more acts in which a person directly, indirectly or through third parties, by any action, method, device or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person or interferes with a person's property.

The following also constitute violations of this Policy:

- Complicity: Assisting, facilitating, or encouraging the commission of a violation of this Policy.
- Retaliation: Acts or attempted acts for the purpose of interfering with any report, investigation, or proceeding under this Policy, or as retribution or revenge against anyone who has reported Sexual Misconduct or Relationship Violence or who has participated (or is expected to participate) in any manner in an investigation, or proceeding under this Policy. Prohibited retaliatory acts include, but are not limited to, intimidation, threats, coercion, or discrimination. To be clear, retaliation against a Complainant for reporting an incident or against any witness who participates in an investigation is strictly prohibited.

C. Who are "Complainants" and "Respondents"?

South University is not a court of law. We also do not engage in victim-blaming or rushes to judgment. Therefore, without judgment, we refer to anyone who reports that they have experienced Sexual Misconduct as a "Complainant" and to anyone who reportedly has engaged in Sexual Misconduct as a
"Respondent."

D. Defining Consent
In many cases of Sexual Misconduct, the central issue is consent or the ability to give consent. Consent is a voluntary agreement to engage in sexual activity. Consent to engage in sexual activity must exist from beginning to end of each instance of sexual activity. Past Consent does not imply future Consent, and Consent to engage in one form of sexual activity does not imply Consent to engage in a different form of sexual activity. Consent is demonstrated through mutually understandable words and/or actions that clearly indicate a willingness to engage in a specific sexual activity. Consent must be knowing and voluntary. To give Consent, a person must be awake, of legal age, and have the capacity to reasonably understand the nature of her/his actions. Individuals who are physically or mentally incapacitated cannot give Consent.

Silence, without actions evidencing permission, does not demonstrate Consent. Where force, threats, or coercion is alleged, the absence of resistance does not demonstrate Consent. Force, threats, or coercion invalidates Consent. The responsibility of obtaining Consent rests with the person initiating sexual activity. Use of alcohol or drugs does not diminish one's responsibility to obtain Consent or negate one's intent.

Consent to engage in sexual activity may be withdrawn by either person at any time. Once withdrawal of Consent has been clearly expressed, the sexual activity must cease.

Incapacitation is the inability, temporarily or permanently, to give Consent, because the individual is mentally and/or physically helpless due to drug or alcohol consumption, either voluntarily or involuntarily, due to an intellectual or other disability that prevents the student from having the capacity to give Consent, or the individual is unconscious, asleep or otherwise unaware that the sexual activity is occurring. In addition, an individual is incapacitated if they demonstrate that they are unaware of where they are, how they got there, or why or how they became engaged in a sexual interaction. Where alcohol is involved, incapacitation is a state beyond drunkenness or intoxication. Some indicators that an individual is incapacitated may include, but are not limited to, vomiting, unresponsiveness, inability to communicate coherently, inability to dress/undress without assistance, inability to walk without assistance, slurred speech, loss of coordination, lack of awareness of circumstances or surroundings, or inability to perform other physical or cognitive tasks without assistance.

E. Title IX Coordinator & Deputy Coordinators
The Title IX Coordinator for South University is: Alisa Krouse, Vice Chancellor for Student Success and Administration. The Title IX Coordinator is responsible for, among other things, coordinating the campus's efforts to comply with and carry out the campus's responsibilities under Title IX of the Education Amendments of 1972, including compliance with this policy. The Title IX Coordinator will help to coordinate any investigations under this Policy.

In addition, the University Deans of Student Affairs serve as Deputy Title IX Coordinators to help oversee investigations and determination proceedings under this Policy.

F. Advisor
The parties may select an advisor of their choice who may be, but isn’t required to be, an attorney. The advisor may provide support to a party. In a hearing, cross-examination must be done by an advisor, and

not by a party. For a hearing, if a party does not have an advisor present, South University must provide one without fee to the party. The advisor provided by South University to conduct cross-examination at a hearing (if the party does not have an advisor of choice) does not have to be an attorney even if the other party has hired an attorney as their advisor of choice. Advisors conducting cross-examination that are not professionals (attorneys or experienced advocates) must at least be adults capable of understanding the purpose and scope of cross-examination.

Any opportunity provided by South University to have an advisor of choice present during any phase of the Title IX process must be given to both parties. South University may limit the extent that an advisor may participate in the proceedings, but the restrictions must apply equally to both parties. The choice of advisor will not be limited with the exception of decorum issues explained in the Hearings section below.

G. Witness
A person who has knowledge related to specific aspects of a case and may have reported such aspects to the institution.

H. Supportive Measures
Non-disciplinary, non-punitive individualized service offered as appropriate and reasonably available without fee to the Complainant or Respondent before or after the filing of a formal complaint or where no formal complaint is filed. Supportive measures are designed to restore or preserve equal access to the education program or activity without unreasonably burdening the other party. The measures are designed to protect the safety of all parties or the educational environment or to deter sexual harassment. They may include counseling, extensions of deadlines or other course-related adjustments, modifications of work or class schedules, campus escort services, mutual restrictions on contact between the parties, changes in work or housing locations, leaves of absence, increased security and monitoring of certain areas of the campus, and other similar measures.

II. REPORTING & CONFIDENTIALITY
We encourage victims of Sexual Misconduct & Relationship Violence to talk to somebody about what happened - so they can get the support they need, and so the University can respond appropriately. Different employees on campus have different abilities to maintain confidentiality:

- CONFIDENTIAL REPORTING: Some individuals are required to maintain near complete confidentiality. These include professional counselors such as those provided by the Student Assistance Program counselling services. These individuals can provide resources and generally talk to a victim without revealing any personally identifying information about an incident to the University. A victim can seek assistance and support from these individuals without the University's involvement in the matter.
- NON-CONFIDENTIAL REPORTING. Other than professional counselors defined above, most other employees and contractors are required to report all the details of an incident to the Title IX Deputy or Coordinator. A report to these employees (called "responsible employees") constitutes a report to the University and generally obligates the University to take appropriate steps to address the situation. The following campus employees (or categories of employees) are examples of responsible employees: the Title IX Coordinator, all Deputy Title IX Coordinators, Assistant Vice Chancellor for Student Services, Dean of Student Affairs, other Student Affairs staff, Academic Advisors, the Security Team (including contract security personnel), all full-time and adjunct Faculty, Human Resources, and Employee Relations.
- Electronic and Anonymous Reporting. You may also file a complaint about sexual misconduct using the appropriate links below. While anonymous complaints are accepted, South University's ability to address misconduct reported anonymously is significantly limited. Individuals may use this link on the South University portal to electronically file a report of sexual misconduct with South University by clicking here: sutitleIX@southuniversity.edu

- Local Law Enforcement. At all South University locations, call 9-1-1 to contact local law enforcement, fire, or EMS to report an emergency or crime. Call 9-9-1-1 from a South University phone.
- Prohibition of False Accusations. Deliberately false and/or malicious accusations of sexual misconduct, relationship violence, stalking or other conduct prohibited by this policy, as opposed to complaints which, even if erroneous, are made in good faith, are serious and will subject the perpetrator of those accusations to appropriate disciplinary action. Good faith means that a report is made based on fact or reasonable beliefs and not solely on personal animus against the person accused.

The University will seek to protect the privacy and confidentiality of the individuals involved in any report of alleged Sexual Misconduct or Relationship Violence to the extent possible and allowed by law. The Title IX Coordinator will evaluate any request for confidentiality in the context of the University's responsibility to provide a safe and nondiscriminatory environment to all members of its community.

The University will complete any publicly available record-keeping, including Clery Act reporting and disclosure, without the inclusion of identifying information about the alleged victim. It will also maintain as confidential any interim measures or remedies provided to the alleged victim to the extent that maintaining confidentiality will not impair its ability to provide the interim measures or remedies.

In addition to internal reporting, the University strongly encourages anyone who believes they have experienced a sexual assault (or any other crime) to make a report to local law enforcement. Collection and preservation of evidence relating to the reported sexual assault is essential for law enforcement investigations, so prompt reporting of the incident to law enforcement is especially critical. Designated staff will, upon request, assist an individual in making a report to law enforcement as necessary and appropriate.

Although we strongly encourage complainants to report to local law enforcement, such a report is not a prerequisite to the University's review and investigation of any complaint covered by this Policy. The University will honor a Complainant's request not to report the matter to local law enforcement unless we have a reasonable basis to believe that the safety and security of the campus community is at risk. In this event, the University will endeavor to notify a Complainant or Reporter of the institution's intent to report the matter to law enforcement in advance of any such report.

The University does not limit the time frame for reporting under this Policy, although a delay in reporting may impact the University's ability to take certain actions.

Please Note: The Title IX Coordinator and Deputy Coordinators are not confidential sources of support. While they will address your complaint with sensitivity and will keep your information as private as possible, confidentiality cannot be guaranteed. See the list below of outside services which may provide confidential counseling.
Please Also Note: Making a report is different from filing a complaint. A report is defined as notification of an incident of sexual misconduct to the Title IX Coordinator/designee. A report may be accompanied by a request for (1) supportive or interim measures; (2) no further action; and/or (3) the filing of a formal complaint. See Process After Report of Sexual Misconduct section below for subsequent steps.

Other Code of Conduct Violations: The University encourages students who have been the victim of Sexual Misconduct or Relationship Violence to come forward. Students should not be discouraged from reporting such incidents because they fear discipline for their own violations of the Student Code of Conduct, such as use of alcohol in University housing. Therefore, the University has discretion not to

pursue other violations of the Student Code of Conduct that occurred in the context of the reported incident of Sexual Misconduct or Relationship Violence.

III. RIGHTS AND RESPONSIBILITIES

A. Reports and complaints have different meanings. An individual has a right to make a report of sexual misconduct to South University, which may be accompanied by request for supportive measures. An individual also has a right to make a complaint of sexual misconduct, which is a request to initiate South University in an informal resolution process or a formal disciplinary process, which includes an investigation and may proceed to a formal hearing.
B. Prior to the conclusion of a sexual misconduct investigation, the reporting party may request to withdraw the complaint by contacting the Title IX Coordinator or designee in writing. They will determine whether to close the case or conclude the investigation without the Complainant's continued participation.
C. An individual also has the right to report sexual misconduct to law enforcement, separate and apart from any report or complaint made to South University.
D. At the time a report is made, the reporting party does not have to decide whether to file a complaint or make a report of sexual misconduct to law enforcement.
E. An affected party has the right to request supportive measures from South University, which may include interim contact restrictions.
F. The reporting party has the right to seek medical treatment to address physical and mental health and to preserve evidence.
G. A report may become a formal complaint, either initiated by the Complainant or the Title IX Coordinator. To file a formal complaint, please contact the Title IX Coordinator/designee.

IV. COMPLAINT RESPONSE, SUPPORTIVE MEASURES AND INFORMAL RESOLUTION

Students are encouraged to report any incident of Sexual Misconduct or Relationship Violence to the Title IX Coordinator, Deputy Title IX Coordinator, the Dean of Student Affairs, or the Assistant Vice Chancellor for Student Services.

Formal Complaint. A formal complaint is a document filed by a Complainant alleging sexual harassment against a Respondent and requesting that South University investigate the allegation of sexual harassment. A formal complaint may be filed with the Title IX Coordinator or a Deputy Title IX Coordinator in person, by mail, by electronic mail, or using an available online reporting system. A formal complaint filed by a Complainant must have the Complainant's physical or digital signature or otherwise indicate that the Complainant is the person filing the formal complaint.

There is no specific form required to file a formal complaint. Moreover, there is no requirement that the formal complaint include a detailed statement of facts or the name of the Respondent if that is not known. In addition to a Complainant, there are circumstances when the Title IX Coordinator may sign a formal complaint. Other third parties cannot. A Title IX Coordinator may sign a formal complaint in the absence of one signed by a Complainant in order to protect the educational community. In deciding whether to sign a formal complaint, the Title IX Coordinator may consider a variety of factors, including a pattern of alleged misconduct by a particular Respondent; allegations of the use of violence and/or the use of weapons; or similar factors. The Title IX Coordinator may sign a formal complaint only after the Title IX Coordinator has contacted the Complainant (the person alleged to have been victimized by sexual harassment) to discuss the availability of supportive measures, considered the Complainant's wishes with respect to supportive measures, and explained to the Complainant the process for filing a formal complaint.

When the Title IX Coordinator decides to sign a formal complaint that originated with an anonymous complaint, the written notice of the allegations must be sent to both parties and include the identity of the parties, if known.

The signing of a formal complaint by the Title IX Coordinator does not place the Title IX Coordinator in a position adverse to the Respondent. When the Title IX Coordinator initiates an investigation based on allegations of which the Title IX Coordinator has been made aware, the Title IX Coordinator is not prevented from being free from bias or conflict of interest with respect to any party.

An investigation and grievance process cannot proceed pursuant to this Title IX policy in the absence of a signed formal complaint. If the Complainant's identity is unknown, the grievance process may proceed if the Title IX Coordinator determines it is necessary to sign a formal complaint. In that case, the written notice of the allegations would not include the Complainant's identity as it is unknown. A Complainant's formal complaint must be investigated even if the Complainant does not know the Respondent's identity because an investigation may reveal the Respondent's identity. Once a Respondent's identity is known, South University will send written notice to both parties.

Formal complaints against more than one Respondent or by more than one Complainant may be consolidated if they arise out of the same facts or circumstances. In that instance, there may be a combined grievance process. A consolidation of formal complaints may include counter-complaints by one party against the other party.
Notice After Filing of a Formal Complaint. When a formal complaint is received (whether signed by the Complainant or the Title IX Coordinator), written notice must be sent to the known parties that includes:

- Notice of the grievance process including any informal resolution process
- Notice of the allegations of potential sexual harassment including sufficient details, if known at the time (identities of the parties involved in the incident; conduct allegedly constituting sexual harassment; date and location of the alleged incident(s))
- A statement that the Respondent is presumed not responsible and that a determination regarding responsibility is made at the conclusion of the grievance process
- A statement that the parties may have an advisor of their choice who may be, but is not required to be, an attorney
- A statement that the parties may inspect and review the evidence as permitted by this policy and law after the investigation
- A statement that knowingly making false statements or knowingly submitting false information during the Title IX grievance process violates South University's code of conduct.

Known parties will be provided notice of additional allegations being investigated not included in the initial notice.
Upon receipt of a complaint, the University will generally proceed as described below.

A. Initial Response
Upon receipt of a report of sexual misconduct, the Title IX Coordinator or designee will provide resources and support information by contacting the potential Complainant and offering an initial meeting between the reporting party and the Title IX Coordinator or designee. The initial meeting is optional and the reporting party may decline. The purpose of the initial meeting is for the Title IX Coordinator or designee to gain a basic understanding of the nature and circumstances of the report and provide information about resources, supportive measures, and resolution options to the reporting party.
The Respondent also will be offered appropriate resources and notified of applicable policies and procedures.

B. Interim and Supportive Intervention
The Title IX Coordinator or a Deputy Title IX Coordinator will promptly contact the Complainant to discuss supportive measures and how they are available with or without the filing of a formal complaint, consider the Complainant's wishes with respect to supportive measures, and explain to the Complainant the process for filing a formal complaint. The Respondent and other affected parties may also be

provided supportive measures. These measures may be to protect, assist, and/or to forestall retaliation. South University may also take interim measures to protect the South University community at large. See the definition of "supportive measures" in the Definitions section.

South University's primary goal is to ensure that the parties and the South University community are safe. Regardless of whether a Complainant chooses to pursue disciplinary action, South University will take interim measures to protect those involved and ensure that all safety, emotional, and physical well-being concerns are met.
Reasonable interim measures to protect the safety of the parties will be determined on a case-by-case basis. In making the determination, South University will consider, at a minimum, the parties' expressed need, the severity or pervasiveness of the allegations, the continuing effects, the likelihood that the parties will come into contact with each other through daily activities, and whether any legal steps have been taken to protect either party.

Student Supportive Measures:
Some examples of supportive measures South University may provide to students include modifying class schedules, workplace schedules, and/or extracurricular activities; assisting in obtaining counseling and academic support services; student financial aid guidance; offering extra time to complete a course if possible; providing escort services on campus from the campus police; and initiating a no contact order. Also see the Emergency Removal of the Respondent section.

Staff Supportive Measures:
Some examples of supportive measures South University may provide to a staff member include modifying work schedule, workplace department or location, or supervisor; assisting in obtaining counseling services; providing escort services on campus and increasing security around the employee; initiating a no-contact order; and issuing a persona non grata order to prevent a person from coming on campus.

Faculty Supportive Measures:
Some examples of supportive measures South University may provide to a faculty member include modifying teaching schedule, workplace schedule, extracurricular schedule, or supervisor; assisting in obtaining counseling services; providing escort services on campus and increasing security around the faculty member; initiating a no-contact order; and issuing a persona non grata order to prevent a person from coming on campus.

Emergency Removal of the Respondent
South University is permitted to remove a Respondent from its education program or activity on an emergency basis if South University undertakes an individualized safety and risk analysis and determines that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of sexual harassment justifies removal. In that instance, South University will provide the Respondent with notice and an opportunity to challenge the decision immediately following the removal.

Administrative leave
South University may place a non-student employee on administrative leave during the pendency of a grievance process.

C. Informal Resolution
Only after a formal complaint has been filed, the parties may decide to participate in an informal resolution process, however such participation may not be required. South University may facilitate an informal resolution process at any time prior to reaching a determination regarding responsibility. Informal resolution processes do not involve a full investigation and adjudication and may

encompass a broad range of conflict resolution strategies, including, but not limited to, arbitration, mediation, or restorative justice.
At any time prior to agreeing to a resolution, any party may withdraw from the informal resolution process and resume the grievance process with respect to the formal complaint. The parties must provide voluntary written consent for an informal resolution process to proceed. In that event, the parties must be provided written notice disclosing the allegations and the requirements of the informal resolution process. No informal resolution process is available regarding allegations that an employee sexually harassed a student.

D. Decision to Proceed to Investigation
If it is appropriate and the parties choose and complete an informal resolution process there may be no formal investigation. If necessary, a full investigation will be promptly engaged. Such investigations will include interviews with the Complainant, Respondent, and relevant witnesses. In conducting the investigation, the manager of the investigation/resolution process may be assisted by other individuals, including special consultants engaged for the particular investigation. A thorough review of pertinent physical and documentary evidence will also occur. The evidence may include photographs, videos, electronic messages (including emails and text messages), social media postings, and any other relevant resources. The parties should be most scrupulous in preserving all evidence.

The parties are not granted the right to depose parties or witnesses, nor to invoke a court system's subpoena powers to compel parties or witnesses to appear at hearings.

V. INVESTIGATION, HEARING AND APPEAL PROCEDURES

- A Complainant is not required to participate in the Title IX process or to provide any information to the Title IX Coordinator.
- South University may not access, consider, disclose, or otherwise use a party's records that are made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in the professional's or paraprofessional's capacity or assisting in that capacity and were made and maintained in connection with the provision of treatment to the party unless the party provides voluntary written consent to do so for a grievance process.
- Both parties must be given an equal opportunity to present fact and expert witnesses and other inculpatory and exculpatory evidence.
- Neither party should be restricted in the ability to discuss the allegations under investigation or to gather and present relevant evidence.
- Both parties must have the same opportunities, if any, to have others present during any meeting or grievance proceeding, including the opportunity to be accompanied to any related meeting or proceeding by the advisor of their choice, who may be, but is not required to be, an attorney.
- South University may establish restrictions regarding the extent to which the parties' advisors may participate in the proceedings; such restrictions shall apply equally to both parties.
- Both parties must be given written notice of all hearings, investigative interviews, or other meetings at which they are invited or expected to attend with sufficient time to prepare. Notice must include the date, time, location, participants, and purpose.
- Both parties must be provided with an equal opportunity to inspect and review any evidence obtained in the investigation of the allegations raised in a formal complaint, including evidence South University does not intend to rely on in reaching a determination regarding responsibility. Such evidence includes inculpatory and exculpatory evidence. It includes evidence obtained from a party or other source.
- Non-participating Complainants must also be given the opportunity to inspect, review, and respond to the evidence.
- Prior to completion of the investigative report, both parties must be sent (including their advisor, if any), the evidence subject to inspection and review in an electronic format or a hard copy and

given at least ten days to submit a written response. The investigator must consider such written responses prior to completion of the investigative report. This evidence must be available at any hearing so that it may be referred to or used for cross-examination.
- South University may impose on the parties and each party's advisor restrictions or require a non-disclosure agreement (NDA) not to disseminate any of the evidence subject to inspection and review or use such evidence for any purpose unrelated to the Title IX grievance process, as long as doing so does not violate Title IX regulations or other applicable laws.

A. About the investigation report:
After the investigation and the parties have been given an opportunity to submit a response to the evidence they were able to inspect and review, the investigator will create an investigative report that summarizes the relevant evidence. The report must be sent at least ten days prior to a hearing or other time of determination regarding responsibility to each party and each party's advisor, if any. The report must be sent in an electronic format or a hard copy for their review and written response.

All evidence summarized in the investigative report must be relevant. Evidence is relevant if it is probative of any material fact concerning the allegations, with exceptions. The investigator may redact from the investigative report information that is not relevant and also information protected by a legally recognized privilege, or treatment records for which there is no written consent to use. The investigative report may include facts and interview statements.
The investigator may include recommended findings or conclusions in the investigative report; however, the decision-maker is under an independent obligation to objectively evaluate relevant evidence and cannot simply defer to the recommendations made by the investigator in the investigative report.

A single investigative report may be made in the context of a grievance process that involves multiple Complainants, multiple Respondents, or both.

B. Hearings
- Formal complaints not dismissed or resolved by informal resolution will proceed to a live hearing. Elements of the live hearing follow.
- Hearings are held live, however at the request of either party, the live hearing may occur with the parties located in separate rooms with technology enabling the decision maker(s) and parties to simultaneously see and hear the party or the witness answering questions.
- Parties' advisors may represent parties during the entire live hearing.
- Parties must inform South University at least seven (7) days prior to a hearing whether the party intends to bring an advisor of choice to the hearing. If the party does not intend to bring an advisor of choice, South University will appoint an advisor for that party for the hearing.
- If a party appears at a hearing without an advisor and South University did not have the seven-day advance notice to appoint an advisor for the party, the hearing will stop and may be rescheduled if necessary to permit South University to assign an advisor to that party to conduct cross-examination.
- Parties and advisors must participate respectfully and non-abusively during a hearing; this includes not yelling at the other party or others in the hearing. If a party's advisor refuses to act in a respectful and non-abusive manner, South University may require the party to use a different advisor.
- South University may permit the parties' advisors to make brief opening or closing statements.
- South University may make an opening or closing statement.
- South University may present evidence to the decision-maker which may be used by the decision-maker in reaching a determination regarding responsibility.
- The decision-maker has the right and responsibility to ask questions and elicit information from parties and witnesses on the decision-maker's own initiative to aid the decision-maker in

obtaining relevant evidence both inculpatory and exculpatory, and the parties also have an equal right to present evidence in front of the decision-maker so the decision-maker has the benefit of perceiving each party's unique perspective about the evidence.

- At the live hearing, the decision-maker(s) must permit each party's advisor to ask the other party and any witnesses relevant and follow-up questions, including to challenge credibility. Cross-examination must be conducted directly, orally, and in real time by the party's advisor, but never by a party personally.
- Only relevant cross-examination and other questions may be asked of a party or witness. Before a question is answered by a party or witness, the decision-maker(s) must first determine whether the question is relevant and explain decisions to exclude a question as not relevant.
    - In determining what evidence is relevant, a layperson's determination that a question is not relevant is made by applying logic and common sense, but not against a backdrop of legal expertise.
    - At a hearing, a decision-maker may find that a question is irrelevant because it is not probative of any material fact concerning the allegations.
    - Where evidence is duplicative of other evidence, the decision-maker may deem the evidence not relevant.
    - Information that is not relevant includes information protected by a legally recognized privilege; any party's medical, psychological, and similar records unless the party has given voluntary, written consent; and party or witness statements that have not been subjected to cross examination at a live hearing.
    - Questions and evidence about the Complainant's sexual predisposition or prior sexual behavior are not relevant unless such evidence is offered to prove that someone other than the Respondent committed the alleged conduct 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.
    - Relevant evidence will not be excluded solely because such relevant evidence may be unduly prejudicial, concern prior bad acts, or constitute character evidence.
    - Written questions may not be submitted for the purpose of ascertaining relevance prior to or during a hearing.
    - The advisors may discuss the relevance determination with the decision-maker during the hearing, however there will be no challenging the relevance determination after receiving the decision-maker's explanation during the hearing.
- Parties and witnesses may not waive a question.
- If a party or witness does not submit to cross-examination at the live hearing, the decision-maker(s) must not rely on any statement of that party or witness in reaching a determination regarding responsibility.
    - This includes statements made against a party's interest.
    - This includes situations where the party or witness does not appear due to death or post-investigation disability.
    - Family or friends of a party cannot recount the statement of the party who does not appear at the hearing; the party must submit to cross-examination.
    - A party's statements in police or SANE (sexual assault nurse examiner) report may not be relied upon unless the party or witness submits to cross-examination.
    - Text message and emails, even where parties' statements are intertwined, may not be relied upon unless the makers of the text messages or emails submit to cross-examination.
- The decision-maker(s) cannot draw an inference about responsibility based solely on a party's or witness's absence from the live hearing or refusal to answer cross-examination or other questions.
- A decision-maker may consider video evidence showing the underlying incident even if a Complainant refuses to answer cross-examination questions.

- Where a grievance process is initiated because the Title IX Coordinator, and not the Complainant, signed the formal complaint, the Complainant who did not wish to initiate a grievance process remains under no obligation to then participate in the grievance process and statements by the Complainant who does not submit to cross-examination at a hearing may not be considered by the decision-maker.
- South University will create an audio or audiovisual recording or transcript of any live hearing and make it available to the parties for inspection and review. South University is not obligated to send the parties a copy of the recording or transcript.
- The decision-maker(s) must issue a written determination regarding responsibility using the standard of evidence adopted, preponderance of the evidence.
    - The decision-maker must objectively evaluate all relevant evidence, both inculpatory and exculpatory, and independently reach a determination regarding responsibility without giving deference to the investigative report. o Admissible, relevant evidence must be evaluated for weight or credibility by the decision-maker.
    - Credibility determinations are not based solely on observing demeanor, but also are based on other factors (e.g., specific details, inherent plausibility, internal consistency, corroborative evidence).
    - The degree to which any inaccuracy, inconsistency, or implausibility in a narrative provided by a party or witness should affect a determination regarding responsibility is a matter to be decided by the decision-maker after having the opportunity to ask questions of parties and witnesses and observing how parties and witnesses answer the questions posed by the other party.

C. Possible remedies and disciplinary sanctions

Upon a finding that the Respondent was responsible for the alleged actions constituting prohibited activities under this policy, the potential penalties range from remedies similar to supportive measures to probation, suspension, and dismissal from South University.

D. Decision-Maker's Written Determination

The written determination must include:

- Identification of the allegations potentially constituting sexual harassment
- A description of the procedural steps taken from the receipt of the formal complaint through the determination. Include notifications to the parties, interviews with the parties and witnesses, site visits, methods used to gather other evidence, and hearings held.
- Findings of fact supporting the determination. The decision-maker must lay out the evidentiary basis for conclusions reached in the case.
- There is no requirement that the written determination address evaluation of contradictory facts, exculpatory evidence, "all evidence" presented at a hearing, or how credibility assessments were reached.
- Conclusions regarding the application of South University's code of conduct to the facts
- A statement with the determination regarding responsibility for each allegation and the rationale for each such determination
- Disciplinary sanctions to be imposed on the Respondent
- Whether remedies designed to restore or preserve equal access to South University's education program or activity will be provided to the Complainant, however the nature of the remedies provided to the Complainant should not appear in the written determination. Remedies which do not directly affect the Respondent must not be disclosed to the Respondent. The Title IX Coordinator is responsible for effective implementation of any remedies.
- Procedures and permissible bases for the Complainant and Respondent to appeal

The written determination must be provided to the parties simultaneously. The determination regarding responsibility is final either on the date that the written determination of the result of an appeal is provided to the parties, if an appeal is filed, or on the date when an appeal would no longer be considered timely.
If it is determined that a violation of the Title IX policy did not occur, but the reported behavior would violate a different South University policy such as the student code of conduct, the case may be referred for resolution as appropriate.

E. Right to Appeal
Both parties may appeal from a determination regarding responsibility and from a dismissal of a formal complaint or any allegations therein on these bases:

- Procedural irregularity that affected the outcome of the matter
- New evidence that was not reasonably available at the time the determination regarding responsibility or dismissal was made that could affect the outcome of the matter
- The Title IX Coordinator, investigator(s), or decision-maker(s) had a conflict of interest or bias for or against Complainants or Respondents generally or the individual Complainant or Respondent that affected the outcome of the matter

The other party will be notified in writing when a party files an appeal and will be provided the appeal document. The other party may file a written statement in response to the appeal within seven (7) business days of the date the appealing party's appeal was provided.

An appeal must be filed with the Title IX Coordinator within seven (7) business days of the date of the decision-maker's written determination. The appeal must include an explanation of the basis of the appeal. The Title IX Coordinator will forward the appeal, the decision-maker's written determination, and all other materials from the investigation and hearing to the Assistant Vice Chancellor for Student Services of South University for a final decision.

The Assistant Vice Chancellor for Student Services will review the materials provided using a preponderance of the evidence standard and will issue in a reasonably timely manner an Appeal Outcome Letter detailing the final decision and the rationale for the result, which may affirm, reverse or modify the determination of the decision-maker. The decision of the Assistant Vice Chancellor for Student Services is final. The written appeal decision will be simultaneously provided to both parties.

VI. CRIME VICTIM AND OTHER COUNSELING SERVICES

South University students may access confidential counseling services at no cost, 24 hour/day, 7 days/week, by calling South University- Reach Student Assistance Program at 833-434-1217. Students may speak or video chat with a licensed counselor regarding any concern. Students may be referred to up to six counseling sessions with a licensed mental health counselor. A student in crisis should call "911". Additional counseling and wellness resources are available through the Be Well at South Portal. Students should see the Dean of Student Affairs for log in credentials to access these digital resources.

VII. PREVENTION AND AWARENESS EDUCATION

South University provides prevention and awareness programming concerning sexual assault, dating violence, domestic violence, stalking, and other sex offenses to students and employees. The programming identifies prohibited conduct, addresses consent, provides information regarding bystander intervention and risk reduction, and identifies resources available to individuals who experience or witness Sexual Misconduct or Relationship Violence.

For purposes of prevention and awareness materials, sexual assault may include conduct meeting the definitions historically identified as rape, fondling, incest, or statutory rape, including sexual acts directed

against another person without consent or where the person is incapable of giving consent. Fondling refers to nonconsensual touching of private body parts for purposes of sexual gratification. Incest refers to sexual intercourse between persons related within degrees in which marriage is prohibited by law. Statutory rape refers to sexual intercourse with a person under the applicable statutory age of consent.

Training and educational materials may be provided through an interactive online learning module or other University-sponsored programs and resources and are made available to incoming and current students and new and current employees consistent with applicable requirements.

A. BYSTANDER INTERVENTION

South University provides information regarding safe and positive options for bystander intervention when an individual observes a situation involving a risk of domestic violence, dating violence, sexual assault, stalking, or other prohibited conduct. Bystanders should minimize risk, approach others as a friend when appropriate, avoid antagonistic or violent conduct, be honest and direct when possible, recruit assistance, maintain their own safety, and contact law enforcement when a situation becomes unsafe or otherwise requires emergency assistance.

B. RISK REDUCTION AND WARNING SIGNS

South University provides information intended to help students and employees recognize warning signs of abusive behavior and reduce the risk of potential harm. Warning signs may include being afraid of a partner, constantly monitoring what one says to avoid a confrontation, feelings of low self-worth or helplessness, isolation from family or friends, hiding bruises or injuries, being monitored by a partner at home, work, or school, or being forced to do things one does not want to do.

Individuals who believe they are being abused, or who suspect that someone they know is being abused, are encouraged to seek assistance, speak up or intervene when it is safe to do so, recognize red flags in relationships, consider reporting to local law enforcement or campus security, consider obtaining a protection-from-abuse or no-contact order where available, and trust their instincts when a relationship does not feel safe.

C. IMMEDIATE ASSISTANCE AND PRESERVATION OF EVIDENCE

Following a sexual assault, an individual is encouraged to go to a safe place and seek medical attention. Individuals may wish to avoid showering, bathing, changing or destroying clothing, or otherwise disturbing physical evidence before receiving medical care when doing so is safe and appropriate. A medical examination can identify injuries and may provide evidence if the individual later chooses to pursue a criminal or institutional process. Health care providers may also address concerns regarding pregnancy and sexually transmitted infections.

Individuals are encouraged to contact someone they trust for support and to preserve potentially relevant evidence, including text messages, instant messages, social networking content, emails, photographs, logs, and other communications or documents that may be useful to investigators, decision-makers, or law enforcement. South University will assist a reporting individual in identifying appropriate medical, counseling, and other support resources upon request.

Reporting the rape to the police is up to the victim, but it is important to remember that reporting a rape is not the same as prosecuting a rape. Victims are strongly encouraged to call the police and report the rape. If the victim requests, South University staff will assist the victim in notifying law enforcement authorities.

D. COMMUNITY AND CONFIDENTIAL RESOURCES

In addition to University resources, individuals may seek assistance from community-based rape crisis centers, mental health agencies, victim advocacy services, legal assistance, and other available resources.

The University may assist a student or employee in identifying appropriate off-campus counseling or mental health services when additional services are needed.

Individuals may also contact the Rape Crisis Hotline at 2-1-1, which the prior policy identified as a 24-hour confidential resource. Local community resources may vary by campus and location.

E. ADDITIONAL SUPPORTIVE ACCOMMODATIONS
Upon request and when reasonably available, South University may assist a student or employee with changes to academic, living, transportation, or working situations. Support may include escort services, adjustments intended to avoid unnecessary or unwanted contact with an alleged assailant, academic support or tutoring, counseling referrals, modifications to class or work schedules, and other appropriate supportive measures.

Where appropriate and permitted, South University may assist with compliance with protection orders, no-contact orders, restraining orders, or similar lawful orders of which the University becomes aware.

F. ADDITIONAL REPORTING INFORMATION
Any member of the South University community may report conduct prohibited by this Policy. A report may be made to the Title IX Coordinator or Deputy Title IX Coordinator and may include, to the extent known, the nature of the alleged offense, date, approximate time, location, identities of the individuals involved, and names of witnesses. A reporting individual is not required to provide every detail in order to make a report.

G. TRAINING OF TITLE IX PERSONNEL
The Title IX Coordinator and other personnel responsible for investigating or adjudicating matters under this Policy will receive training appropriate to their responsibilities, including training concerning domestic violence, dating violence, sexual assault, stalking, sexual misconduct, investigation procedures, hearing procedures, and processes designed to protect the safety of affected individuals and promote accountability.

INFORMATION REGARDING REGISTERED SEX OFFENDERS
Information regarding registered sex offenders under section 170101 (j) of the Violent Crime Control and Law Enforcement Act of 1994 is available from Henrico County Police Department. Information is also available online at: https://www.vspsor.com/ . On-campus computer labs with Internet access are available for you to view the above Web site in the library and on the second floor from 8AM through 8PM Monday through Thursday; 8AM through 5PM Friday and 9AM through 1PM on Saturday.

CRIME STATISTICS
Statistics are provided for your information in compliance with the Jeanne Clery Disclosure of Campus Security Act and Campus Crime Statistics Act. South University prepares the crime statistic policies annually by gathering all reported data and preparing a report for its employees and students. Moreover, local/state police agencies are contacted by the Dean of Student Affairs to maintain a working relationship and formulate statistics for the annual crime statistics report. The chart includes statistics available to South University concerning the occurrences on South University's campus, noncampus building(s) or property(ies), and on public property, which were reported to the local police agencies or the institution.

REPORTING AREA
South University reports statistics from all property owned or controlled by the college. Information relative to areas adjacent or contiguous with Institute facilities has been provided by the Henrico County Police Department.

For purposes of the Clery Act, South University campus is defined as:

Main Academic Facilities:	2151 Old Brick Road, Glen Allen, Virginia
Public Property:	consists of the sidewalks in front of, behind, and on either side of the campus

EMERGENCY NOTIFICATION

At South University, the safety of our students, faculty, and staff is of primary importance and we all are committed to preventing situations that could cause harm to any member of our community. Sometimes emergencies do occur, however, and in the event of an emergency, it's critical to stay informed. That's why South University offers an electronic emergency notification system, called My Campus Alert.

What is it?

In an emergency, ***South University My Campus Alert*** System enables authorized college officials to inform members of South University community about emergency situations through mechanisms other than regular college email, telephones, or building alarms. However, in addition to ***My Campus Alert System***, additional methods of notifications used may include emails, phone trees, campus websites, and digital signs.

How does it work?

My Campus Alert System is a system that can transmit short notifications by email to any outside email address, by text message to a cell phone, or by voice message to an off-campus cell phone or telephone anywhere in the U.S., as well as to on-campus email addresses and telephones. The messages are initiated by a member of the college's crisis communication team only when required for safety purposes. Your personal information and the My Campus Alert system will never be used for any purpose other than emergency notification.

How do I register?

All students, faculty and staff are automatically registered via their school e-mail account. Every student can update their My Campus Alert System contact preference via the student portal homepage. Students can do this via the button entitled 'Update Profile / My Campus Alert'. While additional emergency contact information may be collected directly through human resources or by the registrar, entering your preferred contact information at ***South University My Campus Alert System*** is the only way to ensure that you will receive emergency notification promptly.

Why is this important?

The information in the emergency notification system will be used primarily to contact all members of the campus community in case of emergency, an evacuation due to a natural disaster, or some other urgent situation that requires rapid, wide-scale notification of South University community as determined by the college's senior administration.

Questions?

For further assistance about registering with ***My Campus Alert System***, please contact Dean of Student Affairs, at (804) 727-6865.

EMERGENCY NOTIFICATION AND EVACUATION POLICY

Process used to confirm that there is a significant emergency or dangerous situation:

In the event of a report of a dangerous or emergency situation to any staff member, the staff member will contact the Dean of Students or any other Executive Committee member (Campus President, Dean of Students, Director of Admissions) to report the situation. The Dean of Students or Executive Committee member will then review the situation, and if appropriate confer with local law enforcement or other first

responders, to confirm the issue(s) involved and determine if activation of the Emergency Notification system is warranted.

Process used to determine the appropriate segment(s) of the campus community to receive notification:
In the event of a confirmed emergency situation, the Dean of Students or Executive Committee member will determine the appropriate segments of the campus population to receive notification and determine the content of the notification (i.e., how much information is appropriate to disseminate at different points in time), which will then be passed on to the staff members for immediate dissemination to the campus community via blast email and/or verbally to all students/staff present on campus providing the notification would not compromise the ability to contain the emergency or endanger additional students or staff members. If appropriate, the Dean of Students will activate ***My Campus Alert System***. The only reason that South University would not immediately notify the campus community is if doing so would compromise efforts to assist a victim, contain the emergency, respond to the emergency, or otherwise mitigate the emergency.

The following individuals are responsible for determining the validity of an emergency or dangerous situation and initiation of the Emergency Notification system in order of priority:

1. Campus President
2. Dean of Students

Procedure used to notify the campus:
Upon the confirmation of a significant emergency or dangerous situation involving the immediate threat to the health or safety of student or staff occurring on the campus, South University will immediately notify the campus community, unless issuing a notification will compromise efforts to contain the emergency.

South University will utilize its Senior Staff and Executive Committee members to inform all students and employees on campus of the need to immediately evacuate the premises to a safe location. If the situation allows, Dean of Students will also immediately activate the ***My Campus Alert System*** to send out a notification of the need to evacuate the campus to the designated contact information within the ***My Campus Alert System***. Depending upon the nature of the emergency, the Dean of Students, another Executive Committee member or the senior staff member on campus will determine if the notification would compromise the ability to contain the emergency or endanger additional students or staff members.

The emergency response and evacuation procedures are publicized on an annual basis to all students and faculty through dissemination of this report via email.

The campus emergency notification protocols and procedures are reviewed with each staff member at orientation and subsequently in staff and faculty meetings. Practice drills are conducted at least annually to assure effectiveness of the plan. A description of the practice drill exercise along with a record of the date, time and whether it was announced or unannounced is maintained by the Dean of Students.

SAFETY TIPS
Prevention is your best protection against crime. Here are some precautions you can take to assure greater security.

At Home

- Leave at least one light on, inside and out when you are away. If possible, use a timer to turn lights on and off.
- Keep your doors and windows locked, even if you are at home, and even if you leave for a few minutes.

- NEVER open the door without knowing who is there. Require the caller to identify himself or herself satisfactorily. Use chain bolt when checking ID. If a stranger asks to use a phone, DO NOT PERMIT HIM OR HER TO ENTER. Make the call for that person if you believe it is an actual emergency.
- Keep in touch with your neighbors. Watch each other's apartments and let each other know of anything suspicious.
- Don't give out personal information, such as your address. Report threatening or harassing calls to the police or phone company.

When Walking

- Plan the safest route to your destination and use it. Choose well-lighted busy pathways and streets, avoiding alleys, vacant lots, or construction sites. Take a longer way if it's safer.
- Know your neighborhood and the campus. Find out which buildings are open late (or early) and where you go to summon help if needed.
- Carry your purse close to your body and keep a firm grip on it. Carry a wallet in an inside coat or side trouser pocket, not in the rear trouser pocket.
- Don't flaunt expensive jewelry, clothing, or "flash" cash.
- Have your car or house key in hand and ready as you approach you vehicle or home.
- Never hitchhike.

While Traveling

- Keep doors locked and windows rolled up, especially at stoplights. Always lock your car and take the keys. Keep valuables out of sight in the trunk. Park in areas that will be well-lit when you return. Check the back seat and the area around the car before getting in.
- Car Trouble: Raise the hood. Put on emergency flashers. Stay inside the car and lock the doors. Ask anyone who stops to help to call the police or the nearest service station for you.
- On public transportation, wait in well-lit areas near other people. If someone bothers you, move to a more populated area of the bus or train.

Responding to an Attack

In any situation, your goal is to get away with the least injury to yourself. If an attacker only wants your valuables, give them up. Valuables can be replaced; your life can't. Notify local policy immediately.

Learning to defend yourself is a good idea. However, don't overestimate your abilities. It may take lots of practice before you can use the techniques effectively.

South University, Richmond

2151 Old Brick Road, Glen Allen, Virginia 23060

Police Statistics (Check One):

Yes, local and/or state law enforcement statistics are included:	
No, statistics provided by law enforcement were for an unreasonably contiguous area which would not accurately reflect crimes that occurred on the Institutes' campus, public property, and non-campus buildings or property	
No, local and/or state law enforcement agency did not comply with our request for statistics	X

School Sponsored Housing Locations (housing locations within 1 mile of the campus ONLY) :

Name of Facility	Address

No Housing (check here): X

Non Campus Buildings/Property (including housing that is more than 1 mile from the campus):

Name of Facility	Address

No Non Campus Buildings (check here): X

Public property includes the sidewalks immediately adjacent to the campus, including the parking facility behind and across the street from the campus and the thoroughfare between the campus and parking facility.

South University, Richmond

The following statistics show the <u>total</u> criminal offenses, hate crimes and arrests/referrals for campus disciplinary action that occurred on the Institute's campus, non-campus buildings & property and public property.

	Calendar Year														
	2023					2024					2025				
Criminal Offenses	On Campus	Sponsored Housing	Non-campus buildings and property	Public Property**	Unfounded Crimes	On Campus	Sponsored Housing	Non-campus buildings and property	Public Property**	Unfounded Crimes	On Campus	Sponsored Housing	Non-campus buildings and property	Public Property**	Unfounded Crimes
Criminal Homicide															
Murder & Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sex Offense															
Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

The crimes listed above plus any other crimes involving bodily injury reported to local police agencies or to a campus security authority, that manifest evidence that the victim was intentionally selected because of the victim's actual or perceived race, gender, religion, sexual orientation, ethnicity, or disability are listed below, according to type of criminal offense and category of prejudice.

Should a hate crime be reported, it will be identified by hate crime category (race, gender, religion, etc.).

	Calendar Year														
	2023					2024					2025				
Hate Crimes	On Campus	Sponsored Housing	Non-campus buildings and property	Public Property**	Unfounded Crimes	On Campus	Sponsored Housing	Non-campus buildings and property	Public Property**	Unfounded Crimes	On Campus	Sponsored Housing	Non-campus buildings and property	Public Property**	Unfounded Crimes
Criminal Homicide															
Murder & Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sex Offense															
Ratpe	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Destruction, Damage, Or Vandalism of Property	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Race	Religion	Sexual Orientation	Gender	Gender Identity	National Origin	Disability	Ethnicity

Arrests/Persons Referred for Campus Disciplinary Action

	Calendar Year														
	2023					2024					2025				
	On Campus	Sponsored Housing	Non-campus buildings and property	Public Property**	Unfounded Crimes	On Campus	Sponsored Housing	Non-campus buildings and property	Public Property**	Unfounded Crimes	On Campus	Sponsored Housing	Non-campus buildings and property	Public Property**	Unfounded Crimes
Arrests															
Weapons: carrying, possessing, etc	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Drug Abuse Violations:	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Disciplinary Actions															
Weapons: carrying, possessing, etc	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Drug Abuse Violations:	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

The following statistics show the <u>total</u> incidents of Sexual Violence

	Calendar Year														
	2023					2024					2025				
Criminal Offenses	On Campus	Sponsored Housing	Non-campus buildings and property	Public Property**	Unfounded Crimes	On Campus	Sponsored Housing	Non-campus buildings and property	Public Property**	Unfounded Crimes	On Campus	Sponsored Housing	Non-campus buildings and property	Public Property**	Unfounded Crimes
Domestic Violence	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Stalking	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Totals	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0