



**SAINT LOUIS  
UNIVERSITY  
MADRID**

## **2022 Annual Fire and Security Report**

*This information is provided in compliance with the Federal law, known as the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act. It contains the required crime and fire statistics for the calendar years 2019, 2020, 2021 and the policies and procedures for the academic year 2022-2023.*

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## **Introduction**

Saint Louis University-Madrid Campus (SLU-Madrid) is committed to providing a safe and secure environment by consistently seeking and finding ways to promote, preserve, and deliver a feeling of security, safety, and quality of service to its employees, students, and the community to which it serves.

Regardless of our efforts to provide a safe campus, there is no guarantee that a person will not become the victim of a crime while on campus. Crime prevention is a shared responsibility between the University and its community members. Students, faculty, and staff must accept responsibility for helping to maintain a safe environment.

SLU-Madrid encourages all individuals who attend, work, or visit the campus to follow basic personal and property crime prevention procedures for yourself and for those around you. Please become familiar with the numerous services and procedures that are outlined in this report. If you have any questions, please feel free to contact the Office of Student Life, located in Padre Rubio Hall, Avenida del Valle, 28, by phone at 91 554 5858, ext. 230 or via email at [studentlife-madrid@slu.edu](mailto:studentlife-madrid@slu.edu). Please note that SLU-Madrid does not have law enforcement or security on-site.

In the academic year 2020-2021, SLU-Madrid first-year housing was required. First-year students were housed in Yugo's (formerly Nexo's) Residencia Universitaria El Faro (Plaza Cristo Rey 7, Madrid). This mandatory housing requirement was removed starting 2021-2022; thus, this report no longer includes information, policies, or statistics for Yugo's properties after 2021.

## **Preparation of the Annual Disclosure of Campus Crime Statistics**

The Jeanne Clery Disclosure of Campus Crime Security Policy and Campus Crime Statistics, known as the Clery Act, requires colleges and universities receiving federal financial assistance to gather and publish information about certain crimes that occur on their Clery identified geography and publish policy statements concerning campus safety and security. It is SLU-Madrid's policy to comply with all requirements of the Clery Act.

SLU-Madrid's annual security report is posted on the SLU-Madrid website at <http://www.slu.edu/madrid/campus-life/safety-security/docs/security-report.pdf>; hard copies are available upon request and free of charge from the Office of Student Life, located at Avenida del Valle, 28 or by phoning +91 554 5858, ext. 213 during normal business hours.

SLU-Madrid's "Annual Fire and Security Report" is published by October 1 each year. In conjunction with its publication, email notifications containing the web address of where to access this report are sent to all SLU-Madrid faculty, staff, and students. Campus crime, arrests, student disciplinary referral statistics and hate crime statistics are compiled from reports made to the persons identified by the Clery Act as "campus security authorities" ("CSA"). CSA's are defined by the Clery Act as persons associated with SLU-Madrid who have significant responsibility for student and campus activities, including but not limited to the Madrid Campus Director/Academic Dean, the Director of Student Life, advisors to students/student organizations, and Academic Division Chairs. Letters are also sent to the local law enforcement agency requesting statistics for the Clery report. Starting in 2014, the local/national police no longer provide statistical data for specific locations; instead, those requesting statistics are directed to consult the following website, which has general crime information for the Madrid community:

<https://estadisticasdecriminalidad.ses.mir.es/publico/portalestadistico/publicaciones.html>

## **Reporting Crimes and Other Emergencies Promptly**

To help provide a safe and secure environment, all members of the SLU-Madrid community, including campus visitors, are expected, requested, and encouraged to report any criminal activity or emergency they observe, even if the victim of such crime elects or is unable (physically/mentally) to make such a report. Students, faculty, staff, and guests are encouraged to report crimes and public safety related incidents by telephoning 112 in an accurate and timely manner. To report a crime or an emergency, call 112 (European Union's equivalent to 911).

To reach Student Life staff, call 91 554 58 58, ext. 213; after hours, call 638 763 758. If the crime or emergency is reported to SLU-Madrid personnel, the staff member will in turn contact the appropriate Spanish authorities.

In the EU, there is no charge for dialing 112 from any public phone or a cell phone. When dialing from a phone located on Campus, 0 must be dialed to reach an outside line. Promptly reporting all criminal offenses described in the law ensures their inclusion in the annual crime statistics and will aid in providing Timely Warnings to the community, when appropriate.

If you are unsure what you have witnessed or experienced is a crime, please contact the Student Life, who will assist you with your situation. In response to a call, Student Life staff will take the required action, either going to your location, asking you to come to their office, or assist you in getting help and contacting another agency such as the Spanish authorities. Response time may be affected by several factors, such as the number and location of available personnel and/or their involvement at the time a report is received. Response to an incident may also involve other personnel, i.e., Office of Housing and Residence Life in an incident of drug violation in a residential hall, members from the Wellness Center in the case of a sexual assault, and/or an outside police agency or other agencies if an incident requires specialized abilities beyond the capabilities of the Student Life staff.

### **Emergency Numbers**

- Spain's Emergency Number (Police, Ambulance, Fire Emergencies): 112
- Student Life: 638 763 758
- Counseling/Wellness Center: 609 269 323
- Sanitas Health Insurance 24-hour Emergency Number: 609 269 323

## **SLU-Madrid Policy Statement on Campus Law Enforcement Authority**

SLU-Madrid does not employ personnel who meet the description of campus security personnel described in the Department of Education's *Handbook for Campus Safety and Security Reporting*; therefore, SLU-Madrid personnel do not have any authority to make arrests on campus property or any identifiable security patrol jurisdiction for Clery Act purposes.

Violations of the law are referred to local police authorities with jurisdiction on campus and, when appropriate, the SLU-Madrid student disciplinary system. It is the policy of SLU-Madrid to assist authorities with investigations of criminal incidents on campus to the extent it is able. Although SLU-Madrid does not have any memorandum of understandings (MOU's) in place with any local law enforcement agency regarding the investigation of alleged criminal offenses, the campus maintains a strong working relationship with local and national police authorities.

SLU-Madrid's facilities are privately owned by Saint Louis University in Spain, S.A.; thus, SLU-Madrid personnel have the right to ask for identification from anyone on its grounds as well as the right to ask them to leave its facilities and property. Individuals who refuse to follow requests to leave are subject to arrest for trespassing.

### **Monitoring Criminal Activity at Non-Campus Locations**

While SLU-Madrid officials do not have primary responsibility for responding to non-campus properties, they do collaborate with local law enforcement agencies that respond to crimes at those locations and collect the incident data for required reporting under the Clery Act.

Crimes and incidents occurring at non-campus properties, even those controlled or owned by officially recognized student organizations, should be reported to the local law enforcement agency, as they have primary responsibility for taking reports and handling calls for service there. SLU-Madrid officials request all the law enforcement agencies that have jurisdictions for all our non-campus properties to immediately share information about any reported crimes at those locations so it will aid in the issuance of a Timely Warning if appropriate.

### **Criminal Involvement Off Campus**

If a SLU-Madrid student is alleged to have been involved in a criminal incident off campus, local law enforcement authorities with jurisdiction in the location of the alleged incident will be responsible for its investigation.

Students enrolled at SLU-Madrid are subject to the policies outlined in the document entitled its "Student Rights and Responsibilities & Community Standards" at all times. SLU-Madrid reserves the right to pursue disciplinary action as provided for in the Community Standards regardless of the location of the conduct and independent of any civil or criminal legal proceeding.

It is SLU-Madrid's policy to cooperate with local law enforcement authorities investigating criminal incidents involving its students to the extent that it is able. SLU-Madrid has no off-campus student organization facilities.

### **Voluntary Confidential Crime Reporting**

SLU-Madrid strongly encourages all crime victims and witnesses to report the crime to local police authorities immediately (112) and to notify the Office of Student Life. Promptly notifying the Student Life Office will assure the ability to evaluate if a Timely Warning needs to be sent to the campus community, allowing individuals to take steps to protect themselves and prevent similar crimes from occurring.

Per Spanish Law, a second party cannot report a crime. If someone is the victim of a crime and does not want to pursue action through SLU-Madrid or the Spanish police authorities, they may still want to consider making a voluntary confidential report. The purpose of a voluntary confidential report is to comply with the person's wish to keep the matter confidential, while taking steps to ensure the safety of the individual and others. With this information, SLU-Madrid can keep an accurate record of the number of reported incidents on and in the immediate vicinity of the campus, determine if there is a pattern of crime about a particular location, method, or assailant, and alert the campus community to potential danger. Crimes reported in this manner are counted and included in the annual crime statistics disclosure for SLU-Madrid.

## **Pastoral and Professional Counselors Confidential Reporting**

SLU-Madrid campus pastoral and professional counselors are not considered to be campus security authorities for purposes of the Clery Act and are therefore not required by the Clery Act to report crimes for inclusion in the annual security report. Pastoral and professional counselors may inform the people they counsel of the procedure for reporting crimes on a voluntary, confidential basis to Office of Student Life for inclusion in the annual disclosure of campus crime statistics if it is their wish to do so. As a matter of policy, SLU-Madrid's pastoral and professional counselors are encouraged to provide the people they counsel with this information if they deem it appropriate, and in accordance with Spanish law and the standards and rules of their profession. It should be noted that an institution is not required to provide a timely warning with respect to crimes reported to a pastoral or professional counselor.

## **Security Awareness and Crime Prevention Programs**

Security and safety awareness through education is a part of SLU-Madrid's efforts to prevent crime and improve campus safety. During scheduled new student and new employee orientation programs in early September and early January, as well as programs held throughout the school year, Student Life staff address an array of safety and security topics, including:

- Crime Prevention – early September and early January during the student and new faculty orientations and with faculty and staff during their monthly meetings
- Personal Safety – in early September and early January by a representative of the USA Embassy in Madrid
- Sexual Misconduct Awareness and Prevention – in early September and early January with the students by Student Life and with faculty and staff during opening-of-the-term meetings-
- Alcohol and Drug Abuse – in early September and early January during student orientation

The presentations offered by Student Life staff emphasize the responsibility of the individual for not only their own safety, but the safety and security of others. Student Life staff are available to provide crime prevention presentations upon request.

All members of the SLU-Madrid community play a significant role in keeping the campus safe and are encouraged to report any criminal act, unsafe conditions or suspicious activity to the appropriate Spanish authority or to Student Life. Students, faculty, and staff should use sound judgment and take precautions to avoid becoming a victim of crime.

## **Notifications to Victims of Crimes of Violence**

SLU-Madrid 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 such institution against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased as a result of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of this paragraph.

## **Timely Warning Notification**

In an effort to provide timely notice to the SLU-Madrid community, and in event of a crime which may pose a serious or on-going threat to our community, the Director of SLU-Madrid or a

designated substitute in his/her absence has the responsibility to issue the warning and send it via email and through the [SLU App](#).

The SLU-App is available for Apple and Android and can be readily downloaded to cellular phones. The application is called "Saint Louis University." Upon installation, SLU-Madrid community members select "Madrid" as their "role." Once installed, the application provides links to campus information as well emergency information.

SLU-Madrid officials may issue "Timely Warning" crime bulletins to notify members of the community about serious crimes that occur on SLU-Madrid designated property. This requirement applies to Clery Act crimes, and all require a case-by-case assessment as to whether the report presents a serious or continuing threat to the campus community.

The Timely Warning notifications are typically issued for the following Uniform Crime Reporting Program (UCR)/National Incident Based Reporting System (NIBRS) crime classifications: murder/non-negligent manslaughter, major incidents of arson, robbery, and sex offenses. Cases of aggravated assault and sex offenses are considered on a case-by-case basis, depending on the facts of the case and the information known by SLU-Madrid officials. For example, if an assault occurs between two students who have a disagreement, there may be no on-going threat to other campus community members, and a notification would not be distributed. In cases involving sexual assault, they are often reported days, weeks, months or even years after the incident occurred; thus, there is no ability to distribute a "Timely Warning" notice to the community. Sex offenses will be considered on a case-by-case basis depending on when and where the incident occurred, when it was reported and how much information is known by SLU-Madrid officials. Cases involving property crimes will be assessed on a case-by-case basis, and alerts will typically be sent if there is a discernible pattern of crime.

SLU-Madrid officials work to collect this information by requesting all campus security authorities (CSA's) and local law enforcement agencies to report crimes in a timely fashion so a Timely Warning can be issued if necessary. The notification will be made via email as SLU-Madrid does not have an Emergency Text System. The alerts are generally written by the Director of Student Life or designee, in consultation with the Director of SLU-Madrid and his/her senior staff. In addition to the email, notifications are sent through the SLU App and posted at the entrances to all on-campus buildings. Updates to the campus community about any particular case resulting in a Campus Safety Alert notice may be distributed via email, posted on the SLU-Madrid website or announced through the electronic news bulletin.

It should be noted that an institution is not required to provide a timely warning with respect to crimes reported to a pastoral or professional counselor. Additionally, all crime bulletins will be provided to students and employees in a manner that is timely, that withholds the names of victims as confidential and that will aid in the prevention of similar occurrences.

### **Emergency Notification**

General information about the emergency response and evacuation procedures for the campus is publicized as part of the SLU-Madrid's Clery Act compliance efforts and in accordance with Spanish law; this information is available on the [Safety and Security section](#) of the SLU-Madrid website.

The Director of SLU-Madrid or a designated substitute in his/her absence has the responsibility to respond to and summon the local and national law enforcement agencies and emergency response



units to mitigate, investigate and document situations that may present a threat to the safety and security of the campus community. In addition, the Director of SLU-Madrid has the responsibility to respond to such incidents to determine if there is an ongoing threat to the campus community. In such cases, SLU-Madrid will immediately issue a campus emergency alert to the campus community through sending an e-mail, posting a message on the SLU App, and posting notices in campus buildings. SLU-Madrid does not have the ability to notify the community via cellular phone communication. The Director of SLU-Madrid or a designated substitute in his/her absence has the responsibility to communicate to the larger community, including parents, neighbors, and other interested persons. They can obtain information about an emergency on campus via the University webpage ([www.slu.edu/madrid](http://www.slu.edu/madrid)) or the local or national media.

If any SLU-Madrid personnel suspect that there is an emergency or dangerous situation that poses an ongoing threat to the safety and security to members of the SLU-Madrid community, they will alert one of the SLU-Madrid offices identified as “control centers” (*centro de control operativo*) that are staffed and located in all buildings. These control centers are the Office of Finance & Operations (Padre Arrupe Hall), the Office of Student Life (Padre Rubio Hall), and the Reception (San Ignacio Hall). SLU-Madrid staff in the control centers will immediately notify the other control centers as well as the reception areas of each of the campus’ three facilities. In consultation with the Director of SLU-Madrid, when the gravity of the situation is confirmed, SLU-Madrid will consult with Madrid’s emergency response units, Spain’s Civil Guard, or Madrid’s Fire Department. In consultation with the Director of Student Life and other senior staff present on campus, the Director of SLU-Madrid shall without delay – and taking into account the safety of the campus community – determine and write the content of a SLU Emergency Alert email, include information to promote safety and aid in the prevention of similar threats to the campus community and crimes, and he/she will initiate the campus emergency notification system, unless issuing a notification would, in the judgment of the first responders, compromise the efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency. Generally, the Director of Student Life will disseminate the notification via email and the SLU App.

SLU-Madrid has general evacuation guidelines if and when a segment of the campus needs to be evacuated. The plan is affected by multiple factors, including the type of threat, the occupancy of the other buildings and areas of the campus at the time of the incident, etc. Therefore, specific information about a multi-building or area evacuation cannot be shared with the campus community in advance. Campus officials expect members of the community to follow the instructions of first responders on the scene, as this type of evacuation would be coordinated on-site. In some emergencies, community members may be instructed to “shelter in place.”

If an incident occurs and the buildings or areas around you become unstable, or if the air outdoors becomes dangerous due to toxic or irritating substances, it is usually safer to stay indoors. To “shelter-in- place” means to make a shelter of the building that you are in until it is safe to go outside. This means that if an incident occurs and the building you are in is not damaged; stay inside in an interior room until you are told it is safe to come out.

If your building is damaged, take your personal belongings (purse, wallet, access cards, etc.) and follow the evacuation procedures (close your door, proceed to the nearest exit and use stairs, not elevators). Once you have evacuated, seek shelter at the nearest university building quickly. If first responders are on the scene, follow their directions.

Upon confirmation of an emergency or dangerous situation that poses an immediate threat to the health or safety of some or all members of the community, the campus will immediately notify the

campus community. Various systems are in place for communicating information quickly, including an email network, electronic signage posted at building entrances, announcements via public address system and by SLU-Madrid personnel. Some or all methods of communication may be activated in the event of an immediate threat to the community or to the appropriate segment of the community, if the threat is limited to a particular building or segment of the population. SLU-Madrid does not have an Emergency Text System. After the initial communication, the primary means for follow up to the community will be via email and the SLU App. The university may also post on the SLU-Madrid [Safety and Security website](#), communicate through the SLU-Madrid electronic news bulletin or post signage at the entry to buildings.

It should be noted that unlike the timely warning requirement, an emergency notification is not restricted just to Clery reportable crimes. Incidents such as a serious gas leak, haz-mat spill, significant flooding, etc., could warrant the use of this protocol. If an immediate threat exists, an institution must follow its emergency notification procedures but is not required to issue a timely warning based on the same circumstances; however, the institution is required to provide adequate follow-up information to the community as needed.

### **Procedures for Testing Emergency Response and Evacuation Procedures**

SLU-Madrid will publicize its emergency response and evacuation procedures annually in conjunction with at least one test per calendar year. A test is defined as regularly scheduled drills, exercises, and appropriate follow-through activities, designed for assessment and evaluation of emergency plans and capabilities. Each test is documented and includes a description of the exercise, the date and time of the exercise, and whether it was announced or unannounced. These tests may be announced or unannounced depending on the type of exercise. Note that during calendar year 2021, SLU-Madrid did not conduct a test, due to COVID-19 priorities.

Evacuation drills are organized by the Director of Operational Services in compliance with Spanish Law (*La Ley de Prevención de Riesgos Laborales*, art. 26). In addition, SLU-Madrid has written and periodically updates its campus emergency and evacuation guide, *Guía Interna de Emergencia y Evacuación*, which is posted on the [SLU-Madrid website](#) and provides information on the characteristics, objectives and specific details of the plan.

SLU-Madrid strongly recommends that all students, faculty, and staff be familiar with the contents of this guide. Decisions regarding designated locations for long-term evacuations outlined in this plan may be affected by the availability of designated emergency gathering locations on or near campus as well as other factors such as the location and nature of the threat. As an additional security measure, SLU-Madrid distributes and posts essential information about how to respond to emergencies on and off campus in single-sheet document, posted on its website and distributed to all students, faculty, and staff, for immediate reference.

The purpose of evacuation drills is to prepare building occupants for an organized evacuation in case of an emergency. At SLU-Madrid, evacuation drills are used to educate and train students, faculty, and staff on issues specific to their building. During the drill, students, faculty, and staff familiarize themselves with the location of exits, the sound of the fire alarm, and the direction they should travel upon exiting the building. The process also provides SLU-Madrid an opportunity to test the operation of fire alarm system components. Fire alarm system components are also tested every three months by Iberext, S.A., in accordance with Spanish law.

Evacuation drills are monitored by an institution designated by Spain's Social Security System to cover labor-related accidents, Cualtis, which evaluates egress and equipment issues. Reports are prepared by Cualtis which identify deficient equipment so that repairs can be made immediately. Recommendations for improvements are also submitted to the appropriate departments/offices for consideration. Fire extinguishers and alarms are also tested on a periodical basis, and if in disrepair, corrected or replaced.

Students receive information about evacuation and emergency plan procedures during orientation sessions and other meetings throughout the year.

### **Security of and Access to Campus Facilities**

Access to SLU-Madrid facilities is limited to scheduled times, posted on the weekly electronic news bulletin and on the SLU-Madrid website (<https://www.slu.edu/madrid/>). Access to buildings and grounds outside of these scheduled hours is available by telephoning on-campus maintenance (*bedel*) by calling 659 02 05 50.

In general, all campus buildings are closed and alarmed from 10:00 p.m. to 8:00 a.m. each weeknight; only the library, student lounge and computer lab located in San Ignacio Hall are open during weekends.

University identification cards are required to enter the library and computer facilities; all SLU-Madrid students and employees are expected to be able to present their University identification card upon the request of any SLU-Madrid official.

**Building Access:** SLU-Madrid is fenced and gated to divide campus space from the surrounding area; gates are locked outside of open hours and when facilities are not in use. SLU-Madrid's parking lot is gated, operated by remote control, accessible only to faculty and staff who register with the Office of Human Resources for parking privileges.

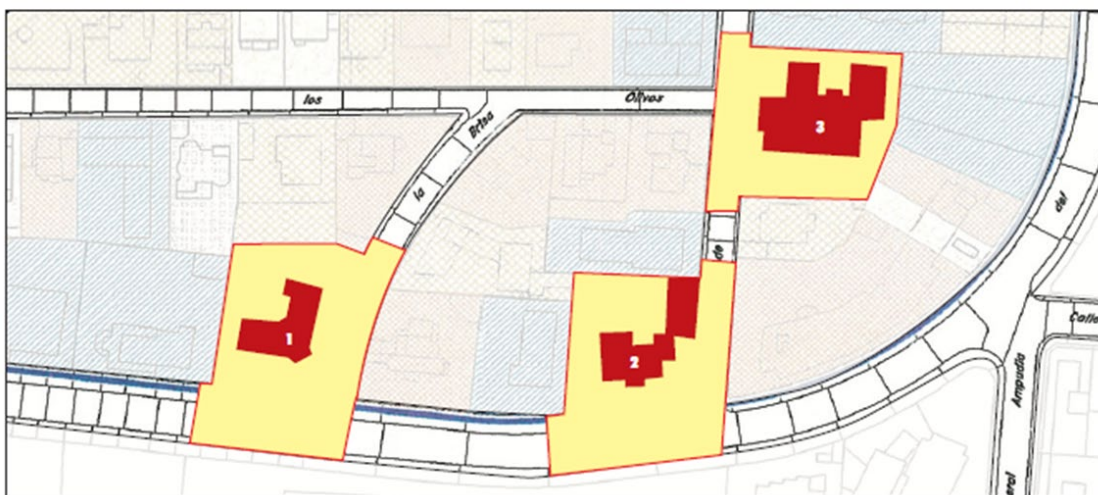
SLU-Madrid's buildings are equipped with intrusion alarms, and all facilities are locked and alarmed when the buildings close. All campus facilities are equipped with external lighting, which functions from sunset to sunrise year-round. Video surveillance cameras are placed at the entrance of each building as well as in the dining hall.

Madrid Campus buildings are open per the following schedule:

Padre Arrupe Hall (Valle 34), Padre Rubio Hall (Valle 28) and San Ignacio Hall (Amapolas, 3):

- Weekdays: 8:00 a.m. - 9:00 p.m.
- On weekdays from 8:00 p.m. - 10:00 p.m., access is available to faculty/staff (only) by telephoning the *bedel* on duty.
- On weekdays after 6:00 p.m., if ground-floor entrance offices are not occupied, the *bedel* has been instructed to shut and lock all doors. Access is available (until 10:00 p.m.) to faculty/staff by telephoning the *bedel* on duty (659 02 05 50).
- Weekends/Holidays: 9:30 a.m. - 9:00 p.m. to faculty/staff (only) by telephoning the *bedel* on duty (659 02 05 50).

Desk workers monitor the access to all three buildings. University identification cards are required to enter facilities; desk workers or other SLU-Madrid staff may request to see identification from any person on campus at any time.



### Security Considerations Used in Campus Facility Maintenance

The Office of Finance & Operations is responsible for facilities management, maintenance, custodial services, buildings and grounds, mail services, parking, University identity cards, transportation and renovation and new construction services. Safety and security issues are considered and implemented in the design and placement of all campus lighting, shrubbery, trees and the like. Safety and security issues are considered when planning and designing major renovations to campus facilities or construction of new facilities on campus. Safety and security maintenance requests receive priority over non-safety and non-emergency work orders. The SLU-Madrid community are expected to report any safety and security maintenance issues promptly when discovered. SLU-Madrid manages a Campus-wide key system, allowing for prompt lock changes when lost keys are reported.

### Drug and Alcohol Use

The possession, use, sale, or furnishing of alcohol on the SLU-Madrid Campus is governed by Spanish law, SLU-Madrid policy and the SLU-Madrid Community Standards sections 3.2-3.3. The legal age for alcohol consumption in Spain is 18. The consumption of alcohol is permitted at receptions,

commencement celebrations, etc. The sale of alcohol is restricted to licensed providers authorized by SLU-Madrid and under a controlled environment.

Use, possession, manufacturing, sale, purchase with the intent to distribute, or distribution of illicit drugs, controlled substances, or drug paraphernalia is forbidden on campus, at homestays or in residences, except as expressly permitted by law. This also includes legal substances that are used in a way not intended by the manufacturer. Factors such as odor, student's physical appearance, and conditions within the room will be taken into consideration when determining whether a drug violation has occurred. Although the possession of marijuana is legal in Spain, it is not permitted on campus, at homestays, or residences.

In accordance with the Drug Free Schools and Communities Act and the Drug Free Workplace Act, Saint Louis University in St. Louis distributes to students and employees an informational brochure annually that includes the University's alcohol and drug policies, counseling and assistance programs, University and legal sanctions, health risks and uses and effects of controlled substances.

- Copies of the informational brochure for students are available on-line at <https://www.slu.edu/student-development/dean-of-students/drug-free-schools.php>.
- Employees at SLU can get a copy of the Drug Free Schools and Communities Act Notice to Employees at [https://slu.policystat.com/policy/token\\_access/ffb5d94e-58ce-4fe8-9fbc-070497e08760/](https://slu.policystat.com/policy/token_access/ffb5d94e-58ce-4fe8-9fbc-070497e08760/)

**Alcohol and Drug Programming:** SLU-Madrid opens discussions and presents to its students information about the dangers of alcohol and drug abuse during its orientation sessions at the start of each term and in first-year seminars (future *Cura Personalis I*) programs. Information related to alcohol and drug programming is available from the Wellness Center; available resources for students is provided to them during both orientation sessions and first-year seminars.

### **Information Regarding Domestic Violence, Dating Violence, Sexual Assault, and Stalking**

SLU-Madrid prohibits the offenses of domestic violence, dating violence, sexual assault, and stalking (as defined by the Clery Act) and reaffirms its commitment to maintaining a campus environment that emphasizes the dignity and worth of all members of the SLU-Madrid community. Toward that end, SLU-Madrid issues this statement of policy to inform the campus community of our programs to address domestic violence, dating violence, sexual assault and stalking as well as the procedures for institutional disciplinary action in cases of alleged dating violence, domestic violence, sexual assault or stalking, which will be followed regardless of whether the incident occurs on or off campus when it is reported to a SLU-Madrid official.

The Clery Act defines the crimes of domestic violence, dating violence, sexual assault and stalking as follows (Note there are no "state" definitions since SLU-Madrid is not located in the U.S.A.):

- Domestic Violence:
  - i. A felony or misdemeanor crime of violence committed—
    - A) By a current or former spouse or intimate partner of the victim;
    - B) By a person with whom the victim shares a child in common;

- C) By a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner;
  - D) By a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; or
  - E) By any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.
- 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.
  - i. The existence of such a relationship shall be based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship and the frequency of interaction between the persons involved in the relationship.
  - ii. For the purposes of this definition—
    - A) Dating Violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.
    - B) Dating violence does not include acts covered under the definition of domestic violence.
  - iii. For the purposes of complying with the requirements of this section and §668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.
- Sexual Assault: An offense that meets the definition of rape, fondling, incest, or statutory rape as used in the FBI's Uniform Crime Reporting (UCR) program. Per the National Incident-Based Reporting System User Manual from the FBI UCR Program, a sex offense is "any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent."
  - i. Rape is defined as 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.
  - ii. Fondling is defined as the touching of the private parts of another person for the purposes of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.
  - iii. Incest is defined as sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
  - iv. Statutory Rape is defined as sexual intercourse with a person who is under the statutory age of consent.

- Stalking:
  - i. Engaging in a course of conduct directed at a specific person that would cause a reasonable person to—
    - A) Fear for the person’s safety or the safety of others; or
    - B) Suffer substantial emotional distress.
  - ii. For the purposes of this definition—
    - A) *Course of conduct* means two or more acts, including, but not limited to, acts which the stalker directly, indirectly, or through third parties, by any action, method, device, or means follows, monitors, observes, surveils, threatens, or communicates to or about, a person, or interferes with a person’s property.
    - B) *Reasonable person* means a reasonable person under similar circumstances and with similar identities to the victim.
    - C) *Substantial emotional distress* means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

The United States and Spain follow different legal systems. This fact makes it difficult to find a similar list of definitions for the crimes listed in the Clery Act. Spanish jurisdiction definitions and sanctions of crimes related to the Clery Act may be found more specifically starting on Title VIII, chapters 1 to 6 (pages 68-74) of the Spanish Law: *Ley Orgánica 10/1995, de 23 de noviembre, del Código Penal.*

### **SLU’s Definition of Consent as It Relates to Sexual Activity**

Note there is no “State jurisdictional definition of Consent” in Madrid, Spain. For the purposes of this document, SLU-Madrid uses the same definitions as Saint Louis University.

#### What is Effective Consent?

- Effective Consent is an affirmative, knowing, and voluntary decision – clearly communicated through mutually understandable words (e.g., saying “yes”) and/or actions – to willingly engage in mutually acceptable sexual activity (e.g., to do the same thing, at the same time, in the same way, with another individual(s)).
- Effective Consent must be given freely, willingly, consciously, and knowingly by each participant to any desired sexual contact.
- Consent may be withdrawn by any consenting party at any time during the sexual activity. Withdrawal of consent must be demonstrated by words and/or actions that indicate a desire to end sexual activity. Once an individual has communicated withdrawal of consent, all sexual activity must end.

#### What is NOT Effective Consent?

- Conduct will be considered “without consent” if no clear consent, verbal or nonverbal, is given.

- Effective Consent cannot be given by someone who is incapacitated.
- Effective Consent cannot be gained through force, threat, intimidation, or coercion.
- A current or previous dating or sexual relationship, by itself, does not constitute Effective Consent. Even in the context of a relationship, there must be mutually understandable communication that clearly indicates a willingness to engage in sexual activity. Effective Consent cannot be assumed based on prior sexual contact or subsequent sexual contact.
- Effective Consent cannot be inferred from silence, passivity, or lack of resistance. Without outward communication or action, Effective Consent does not exist.
- Effective Consent cannot be inferred from an individual's attire or physical appearance.
- Effective Consent cannot be inferred from an individual's offer, acceptance, or participation in any form of non-physical sexual activity (e.g., social media forums, date/activity, consumption of alcohol, or invitation to a dorm room or private area).
- A verbal "no," even if perceived to be indecisive constitutes a lack of consent.

The expectations of our community regarding Consent include, but are not limited to, the following:

- It is the responsibility of the person initiating the sexual activity to obtain the other party's Effective Consent. It is not the responsibility of the intended recipient of such sexual contact to affirmatively deny such consent.
- All parties must have Effective Consent throughout the duration of the sexual activity.
- Effective Consent can be given by words and/or actions. Relying solely upon non-verbal communication, however, can lead to misunderstanding and as a result a potential violation of this Policy.
- Effective Consent to one form of sexual activity is not, by itself consent to other forms of sexual activity.

As of May 2020, University-wide policies related to Title IX are not applicable outside the United States. All sexual misbehavior offenses in SLU-Madrid will follow the conduct processes as specified in the SLU-Madrid [Community Standards](#) in section 8.3.2.

### **How to Be an Active Bystander**

Bystanders play a critical role in the prevention of sexual and relationship violence. According to one resource, Bystanders are "individuals who observe violence or witness the conditions that perpetuate violence. They are not directly involved but have the choice to intervene, speak up, or do something about it."<sup>1</sup> SLU-Madrid strives to promote a culture of community accountability where bystanders are actively engaged in the prevention of violence without causing further harm. Individuals may not always know what to do even if they want to help. Below is a list – adapted from

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



Stanford University's Office of Sexual Assault and Relationship Abuse – of some ways to be an active bystander. **If you or someone else is in immediate danger, dial 112.** Dangerous situations could be when a person is yelling at or being physically abusive towards another and it is not safe for you to interrupt.

1. Watch out for your friends and fellow students/employees. If you see someone who looks like they could be in trouble or need help, ask if they are ok.
2. Confront or seek help for a situation involving someone attempting to engage in sexual activity with someone who is incapacitated due to drug or alcohol consumption.
3. Speak up when someone discusses plans to take sexual advantage of another person.
4. Support someone who discloses sexual assault, abusive behavior, or experience with stalking.
5. Refer people to on or off campus resources listed in this document for support in health, counseling, or with legal assistance.

### **Risk Reduction**

Recognizing that there is no intent to blame victims and that only abusers are responsible for their abuse, the following are some strategies to reduce one's risk of sexual assault or harassment from the Rape, Abuse, & Incest National Network ([www.rainn.org](http://www.rainn.org)):

1. Be aware of your surroundings. Knowing where you are and who is around you may help you to find a way to get out of a bad situation.
2. Try to avoid isolated areas. It is more difficult to get help if no one is around.
3. Walk with purpose. Even if you don't know where you are going, act as if you do.
4. Try not to load yourself down with packages or bags as this can make you appear more vulnerable.
5. Make sure your cell phone is with you and charged.
6. Make sure that you have cab money.
7. Don't allow yourself to be isolated with someone you don't trust or someone you don't know.
8. Avoid putting headphones in both ears so that you can be more aware of your surroundings, especially if you are walking alone.
9. When you go to a social gathering, go with a group of friends. Arrive together, check in with each other throughout the evening, and leave together. Knowing where you are and who is around you may help you to find a way out of a bad situation.

10. Trust your instincts. If you feel unsafe in any situation, go with your gut. If you see something suspicious, contact law enforcement immediately (call 112).
11. Don't leave your drink unattended while talking, dancing, using the restroom, or making a phone call. If you've left your drink alone, don't risk getting your drink drugged – get a new one.
12. Don't accept drinks from people you don't know or trust. If you choose to accept a drink, go with the person to the bar to order it, watch it being poured, and carry it yourself. At parties, don't drink from the punch bowls or other large, common open containers.
13. Watch out for your friends, and vice versa. If a friend seems disoriented or confused, is overly intoxicated, or is acting out of character, get him or her to a safe place immediately.
14. If you suspect you or a friend has been drugged, contact law enforcement immediately (call 112). Be explicit with doctors so they can give you the correct tests (you will need a urine test and possibly others).
15. If you need to get out of an uncomfortable or scary situation here are some things that you can try:
  - a. Keep in mind: being in this situation is not your fault. You did not do anything wrong. It is the person who is making you uncomfortable that is to blame.
  - b. Be true to yourself. Don't feel obligated to do anything you don't want to do. "I don't want to" is always a good enough reason. Do what feels right to you and what you are comfortable with.
  - c. Have a code word with your friends or family so that if you don't feel comfortable, you can call them and communicate your discomfort without the person you are with knowing. Your friends or family can then come to get you or make up an excuse for you to leave.
  - d. Lie. If you don't want to hurt the person's feelings, it is better to lie and make up a reason to leave than to stay and be uncomfortable, scared, or worse. Some excuses you could use are: needing to take care of a friend or family member, not feeling well, having somewhere else that you need to be, etc.
16. Think of an escape route. How would you get out of the room? Where are the doors? Windows? Are there people around who might be able to help you? Is there an emergency phone nearby? Your cellphone?
17. If you and/or the other person have been drinking, you can say that you would rather wait until you both have your full judgment before doing anything you may regret later.

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

SLU-Madrid engages in comprehensive, intentional, and integrated programming, initiatives, strategies, and campaigns intended to end dating violence, domestic violence, sexual assault and stalking that:

- A. Are culturally relevant, inclusive of diverse communities and identities, sustainable,

responsive to community needs, and informed by research, or assessed for value, effectiveness, or outcome; and

- B. Consider environmental risk and protective factors as they occur on the individual, relationship, institutional, community and societal levels.

Educational programming consists of primary prevention and awareness programs for all incoming students and new employees and ongoing awareness and prevention campaigns for students and employees that:

- A. Identifies domestic violence, dating violence, sexual assault and stalking as prohibited conduct;
- B. Defines using definitions provided both by the U.S. Department of Education as well as the laws of Spain on what behavior constitutes domestic violence, dating violence, sexual assault, and stalking;
- C. Defines what behavior and actions constitute consent to sexual activity in Spain;
- D. Provides a description of safe and positive options for bystander intervention. Bystander intervention means safe and positive options that may be carried out by an individual or individuals to prevent harm or intervene when there is a risk of dating violence, domestic violence, sexual assault or stalking. Bystander intervention includes recognizing situations of potential harm, understanding institutional structures and cultural conditions that facilitate violence, overcoming barriers to intervening, identifying safe and effective intervention options, and taking action to intervene;
- E. Provides information on risk reduction. Risk reduction means 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.
- F. Provides information regarding:

Procedures victims should follow if a crime of domestic violence, dating violence, sexual assault and stalking occurs (as described in “Procedures Victims Should Follow if a Crime of Domestic Violence, Dating Violence, Sexual Assault and Stalking Occurs” elsewhere in this document).

- A. How the university will protect the privacy of victims and other necessary parties and offer confidential resources available to the SLU community;
- B. Existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available for victims, both within the institution and in the community;
- C. Options for, available assistance in, and how to request changes to academic, living, transportation, and working situations or protective; and
- D. Procedures for institutional disciplinary action in cases of alleged dating violence, domestic violence, sexual assault, or stalking.

The programs listed below include strategies focused on educating new and current students and employees on the issues involving sexual assault, domestic violence, dating violence and stalking. Some of these programs may involve the distribution of educational materials, inviting guest speakers to campus, providing programs to the community, programs during orientation, etc.

During the academic year 2021-2022, the Office of Student Life and the Wellness Center provided programs covering these topics for all faculty, staff and students during Student Orientation, the First Year Seminars, and the Faculty/Staff workshop.

The following primary prevention and awareness programs for all incoming students offered during the 2021-2022 academic year include:

Program Name	Date (MM/YY)	Location	Topics	Number of Sessions
Welcome Sessions for New, Transfer and Study Abroad Students	08/21 01/22 05/22 06/22	Various Locations on Campus.	Sexual Assault (SA); Domestic Violence (DV); Dating Violence (DAV); Stalking (S); Bystander Intervention (BI)	4

The primary prevention and awareness programs for all new employees offered during the 2021-2022 academic year include:

Program Name	Date (MM/YY)	Location	Topics	Number of Sessions
New Faculty Orientation	08/21 01/22	In-Person	SA, DV, DAV	2

The following on-going awareness and prevention campaigns for students offered during the 2021-2022 academic year include:

Program Name	Date (MM/YY)	Location	Topics	Number of Sessions
US Embassy Safety and Security Presentation	09/21 01/22	Zoom	SA, S, BI	2

The following on-going awareness and prevention campaigns for employees offered during the 2021-2022 academic year include:

Program Name	Date (MM/YY)	Location	Topics	Number of Sessions
General Faculty/Staff Meeting	9/21	Zoom	SA	1

### **Procedures Victims Should Follow if a Crime of Domestic Violence, Dating Violence, Sexual Assault, and Stalking Occurs**

After an incident of sexual assault, dating violence or domestic violence, the reporting party should consider seeking medical attention as soon as possible. In Madrid, victims of sexual assault are typically taken to the La Paz hospital (Paseo Castellana 261). The hospital will not perform a sexual

assault forensic exam unless the assault has already been reported to the police (see the information provided by the U.S. Embassy below, page 32).

It is important that a reporting party of sexual assault not bathe, douche, smoke, change clothing or clean the bed/linen/area where they were assaulted if the offense occurred within the past 96 hours so that evidence may be preserved. This may assist in proving that the alleged criminal offense occurred/or is occurring or may be helpful in obtaining an order of protection. In circumstances of sexual assault, if the reporting party does not opt for forensic evidence collection, health care providers can still treat injuries and take steps to address concerns of pregnancy and/or sexually transmitted infections.

Victims of sexual assault, domestic violence, stalking, and dating violence are encouraged to also preserve evidence by saving text messages, instant messages, social networking pages, other communications, and keeping pictures, logs, or other copies of documents, if they have any, that would be useful to university adjudicators/investigators or police.

### **Involvement of Law Enforcement and Campus Authorities**

Although SLU-Madrid strongly encourages all members of its community to report violations to law enforcement, it is the reporting party's choice whether to make such a report; they have the right to decline involvement with the police.

To report an incident involving sexual assault, domestic violence, stalking, and dating violence, contact the Director of Student Life (915 54 58 58, ext. 213), who will provide information about available resources on and off campus. The Director of Student Life will assist the reporting party with notifying local police if requested. The local police may also be reached directly by calling 91 322 3555 or going in person at Calle Dr. Federico Rubio y Gali, 55.

Sexual misbehavior offenses between SLU-Madrid registered students will follow the conduct processes as specified in section 8.3.2 of SLU-Madrid's Community Standards.

### **Reporting Incidents of Domestic Violence, Dating Violence, Sexual Assault and Stalking**

As of May 2020, Title IX is not applicable outside the United States. If a student has been the victim of domestic violence, dating violence, sexual assault, or stalking, they should report the incident to the Director of Student Life (915 54 58 58, ext. 213), who will provide information about available resources on and off campus.

### **Procedures SLU-Madrid Will Follow When a Crime of Domestic Violence, Dating Violence, Sexual Assault and Stalking Is Reported**

Both Saint Louis University and SLU-Madrid have procedures in place that strive to be sensitive to victims who report sexual assault, domestic violence, dating violence and stalking, including informing individuals about their right to file criminal charges as well as the availability of counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance and other services on and off campus as well as additional remedies to prevent contact between the reporting and accused parties, such as housing, academic, transportation and working accommodations, if reasonably available. SLU-Madrid will make such accommodations, if the victim requests them and if they are reasonably available, regardless of whether the victim chooses to report the crime to local law enforcement. SLU-Madrid students should contact the Director of Student Life (91 554 58 58,

ext. 213 or at 638 763 758); SLU-Madrid employees should contact the Manager of Human Resources (915 54 58 58, ext. 211).

If domestic violence, dating violence, sexual assault or stalking is reported to SLU-Madrid, below are the procedures will be followed:

Incident Being Reported:	Procedure:	Evidentiary Standard
Sexual Assault	<ol style="list-style-type: none"> <li>1. Upon request, SLU-Madrid will help the reporting party access medical care.</li> <li>2. SLU-Madrid will assess immediate safety needs of the reporting party.</li> <li>3. SLU-Madrid will provide the reporting party with information for the local police department AND will assist the reporting party with contacting the local police if they so request.</li> <li>4. SLU-Madrid will provide written information to reporting party on how to preserve evidence.</li> <li>5. SLU-Madrid will provide the reporting party with referrals to on and off campus mental health providers.</li> <li>6. SLU-Madrid will assess the need to implement interim or long-term protective measure, if appropriate.</li> <li>7. SLU-Madrid will provide the reporting party with a written explanation of the reporting party’s rights and options.</li> <li>8. SLU-Madrid will provide a “No Contact” letter to the accused if deemed appropriate.</li> <li>9. SLU-Madrid will help the reporting party in their application to the police for an Order of Protection.</li> <li>10. SLU-Madrid will inform the reporting party that sexual misbehavior is a suspendable offense and will inform the reporting party about the conduct process.</li> <li>11. SLU-Madrid will inform the reporting party of the outcome of the investigation, whether or not the accused will be administratively charged and what the outcome of the hearing is.</li> <li>12. SLU-Madrid will enforce the anti-retaliation policy and take immediate and separate action against parties that retaliate against a person for complaining of sex-based discrimination or for assisting in the investigation.</li> </ol>	Preponderance of evidence
Stalking	<ol style="list-style-type: none"> <li>1. SLU-Madrid will assess immediate safety needs of reporting party.</li> <li>2. SLU-Madrid will provide the reporting party with information for the local police department AND will assist the reporting party with contacting the local police if they so request.</li> <li>3. SLU-Madrid will help the reporting party in their application to the police for an Order of Protection.</li> </ol>	Preponderance of evidence

	<ol style="list-style-type: none"> <li>4. SLU-Madrid will provide written information to reporting party on how to preserve evidence.</li> <li>5. SLU-Madrid will assess need to implement interim or long-term protective measures to protect the reporting party, if appropriate.</li> <li>6. SLU-Madrid will provide the reporting party with a written explanation of the reporting party's rights and options.</li> <li>7. SLU-Madrid will provide a "No Contact" letter to the accused if deemed appropriate.</li> </ol>	
Dating Violence	<ol style="list-style-type: none"> <li>1. SLU-Madrid will assess immediate safety needs of reporting party.</li> <li>2. SLU-Madrid will provide the reporting party with information for the local police department AND will assist reporting party with contacting the local police if they so request.</li> <li>3. SLU-Madrid will help the reporting party in their application for an Order of Protection.</li> <li>4. SLU-Madrid will provide written information to reporting party on how to preserve evidence.</li> <li>5. SLU-Madrid will assess need to implement interim or long-term protective measures to protect the reporting party, if appropriate.</li> <li>6. SLU-Madrid will provide the reporting party with a written explanation of the reporting party's rights and options.</li> <li>7. SLU-Madrid will provide a "No Contact" letter to the accused if deemed appropriate.</li> </ol>	Preponderance of evidence
Domestic Violence	<ol style="list-style-type: none"> <li>1. SLU-Madrid will assess immediate safety needs of reporting party.</li> <li>2. SLU-Madrid will provide the reporting party with information for the local police department AND will assist the reporting party with contacting the local police if they so request.</li> <li>3. SLU-Madrid will help the reporting party in their application to the police for an Order of Protection.</li> <li>4. SLU-Madrid will provide written information to reporting party on how to preserve evidence.</li> <li>5. SLU-Madrid will assess need to implement interim or long-term protective measures to protect the reporting party, if appropriate.</li> <li>6. SLU-Madrid will provide the reporting party with a written explanation of the reporting party's rights and options.</li> <li>7. SLU-Madrid will provide a "No Contact" letter to the accused if deemed appropriate</li> </ol>	Preponderance of evidence

### Assistance for Victims: Rights and Options

Regardless of whether a victim elects to pursue a criminal complaint or whether the offense is alleged to have occurred on or off campus, SLU-Madrid will assist victims of sexual

assault, domestic violence, dating violence, and stalking and will provide each victim with a written explanation of their rights and options. Such written information will include:

- the procedures reporting parties should follow if a crime of dating violence, domestic violence, sexual assault, or stalking has occurred;
- information about how the institution will protect the confidentiality of victims and other necessary parties;
- a statement that the institution will provide written notification to students and employees about victim services within the institution and in the community;
- a statement regarding the institution's provisions about options for, available assistance in, and how to request accommodations and protective measures; and
- an explanation of the procedures for institutional disciplinary action

### **Rights of Victims and SLU-Madrid's Responsibilities for Orders of Protection**

SLU-Madrid cannot legally apply for a legal order of protection for a victim in this jurisdiction. The victim is required to apply directly to Spain's police for these services. Any person who obtains an order of protection from legal authorities should present it to the Director of Student Life, who will develop a Safety Action Plan to reduce risk of harm while on campus or coming and going from campus. This plan may include measures such as changing classroom locations or allowing a student to complete assignments from home, etc.

SLU-Madrid may issue an institutional "No Contact" directive, if deemed appropriate, or at the request of the reporting or accused parties. If SLU-Madrid receives a report that such an institutional no contact order has been violated, SLU-Madrid will initiate appropriate disciplinary proceedings appropriate and may impose sanctions if the accused is found responsible for violating the no contact order.

### **Accommodation and Protective Measures Available for Victims**

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

At the reporting party's request, and to the extent of the reporting party's cooperation and consent, SLU-Madrid will work cooperatively to assist the reporting party in obtaining accommodations and protective measures. If reasonably available, a reporting party may be offered changes to academic, living, working or transportation situations regardless of whether the reporting party chooses to report the crime to Spain's law enforcement.

Examples of options for a potential change to the academic situation may be to transfer to a different section of a class, withdraw and take a class at another time if there is no option for moving to a different section, etc. Potential changes to living situations may include moving to a different room or different host family. Possible changes to work situations may include changing working hours or locations.



To request changes to academic, living, transportation and/or working situations or protective measures, students should contact the Director of Student Life by phone 91 554 58 58, ext. 213 or 638 763 758, by email to [studentlife-madrid@slu.edu](mailto:studentlife-madrid@slu.edu) or in person by visiting Padre Rubio Hall; SLU-Madrid employees should contact Human Resources by phone 91 554 58 58, ext. 211, by email to [hr-madrid@slu.edu](mailto:hr-madrid@slu.edu) or in person by visiting Padre Arrupe Hall. More information for employees can be found on this webpage: [Workplace Harassment Protocol of Action](#).

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

Upon receipt of a report of domestic violence, dating violence, sexual assault or stalking, SLU-Madrid will provide written notification to students and employees about existing assistance with and/or information about obtaining resources and services including counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid and assistance in notifying appropriate local law enforcement. These resources include the following:

On-Campus Resources	Type of Service	Provider	Contact Information
Counseling Mental Health	Personal counseling and referral to off-campus resources	Wellness Center	Padre Rubio Hall Avenida del Valle, 28 Phone: 91 554 5858, ext. 230 Email: <a href="mailto:wellness-madrid@slu.edu">wellness-madrid@slu.edu</a>
Health	Health education, emergency care and treatment of minor injuries. Referrals and resources for confidential care.	Student Life	Padre Rubio Hall Avenida del Valle, 28 Phone: 91 554 5858, ext. 213 Email: <a href="mailto:studentlife-madrid@slu.edu">studentlife-madrid@slu.edu</a>
Victim Advocacy	Off Campus (see below)	See below	Refer to Off-Campus Resources
Legal Assistance	Off Campus (see below)	See below	Refer to Off-Campus Resources
Immigration Assistance	Immigration issues	Student Life	Padre Rubio Hall Avenida del Valle, 28 Phone: 91 554 5858, ext. 239 Email: <a href="mailto:studentlife-madrid@slu.edu">studentlife-madrid@slu.edu</a>
Student Financial Aid	Financial aid, leave of absences, loan repayment terms, etc.	Finance and Operations	Padre Arrupe Hall Avenida del Valle 34 Phone: 91 554 58 58, ext. 203
Student Life	Assist community members with issues pertaining to sexual harassment, including victims of sexual assault, domestic violence, dating violence and stalking.	Student Life	Building: Padre Rubio Hall Avenida del Valle 28 Phone: 91 554 5858, ext. 213 Phone: 638 763 758
Affirmative Action	Director of Institutional Diversity and Equity: Resource for faculty, staff, and students regarding diversity and the EEO and harassment policies	Institutional Equity and Diversity Office in St. Louis, MO.	DuBourg Hall, Room 36 221 N. Grand Blvd. St. Louis, MO Phone: (+1) 314 977 3838
Off-Campus Resources	Type of Service	Provider	Contact Information

Counseling	Counseling and mental health services	Sinews Multilingual Therapy Institute	Calle Zurbano, 34 Phone: 91 700 1979
Health Care	Emergency medical care; Police report must be filed in order to take forensic evidence	Hospital de la Paz	Paseo de la Castellana, 261
Victim Advocacy	Support for victims of sexual assault	Asociación de Asistencia a Mujeres Violadas	C/ O'Donnell, 42 Phone: 91 574 0110
Victim Advocacy	Economic education, childcare, leadership recognition, and transitional housing	Unidad Psicosocial	C/ O'Donnell, 42 Phone: 91 573 0722 Phone: 91 409 1068
Victim Advocacy	Economic education, childcare, leadership recognition, and transitional housing	Servicio de Atención Social a la Mujer y Cooperación	Dirección General de la Mujer C/ Alcalá 257 Phone: 91 720 6223
Legal Assistance	Legal help to low-income and disadvantaged in Spain	Servicio de Orientación Jurídica	Dirección General de la Mujer C/ Gran Vía, 12-1ª planta Phone: 91 420 8593
Legal Assistance	Legal help to low-income and disadvantaged in Spain	Centro de Información de los Derechos de la Mujer	Instituto de la Mujer. (Mª de Trabajo y A. Sociales) C/ Génova, 11-1º dcha Phone: 91 700 1910
Immigration Assistance	Government agency that oversees lawful immigration to the United States.	Comisaría de Policía de Aluche	Carretera de los Poblados, 51
Student Financial Aid	Student financial aid resource	U.S. Department of Education	<a href="https://studentaid.ed.gov/sa/">https://studentaid.ed.gov/sa/</a>
Law Enforcement	Law enforcement	Servicio de Atención a la Víctima (SAVD)	Calle Virgen del Lluç, 103 (24 hours) Phone: 900 222 100
Law Enforcement	Law enforcement	Servicio de Atención a la Mujer (SAM)	Comisaría de Policía Avda. Doctor Federico Rubio y Gali, 55 Phone: 91 322 3421

Other resources available to persons who report being the victim of sexual assault, domestic violence, dating violence or stalking include:

- <http://www.rainn.org>: U.S.-based Rape, Abuse and Incest National Network
- <http://www2.ed.gov/about/offices/list/ocr/index.html>: U.S. Department of Education, Office of Civil Rights

## Confidentiality

Students or employees may request that directory information on file with Saint Louis University be withheld by contacting, if a student, the Office of the Registrar ([registrar-madrid@slu.edu](mailto:registrar-madrid@slu.edu)) or, if an employee, the Office of Human Resources ([hr-madrid@slu.edu](mailto:hr-madrid@slu.edu)).

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

SLU-Madrid does not publish the name of crime victims or other identifiable information regarding victims in a crime log; nor does it publish names the annual crime statistics that are disclosed in compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act. Furthermore, if a Timely Warning Notice is issued based on a report of domestic violence, dating violence, sexual assault or stalking, the name of the victim and other personally identifiable information about the victim will be withheld.

### **Adjudication of Violence Against Women Act (VAWA) Offenses**

SLU-Madrid’s – along with the University’s – disciplinary process includes a prompt, fair and impartial investigation and resolution process. In all instances, the process will be conducted in a manner that is consistent with SLU-Madrid’s policy and is transparent to the reporting and accused parties, according to SLU-Madrid’s Community Standards and Conduct Process.

Usually, the resolution of domestic violence, dating violence, sexual assault and stalking complaints are completed within 90 days of the report. However, each proceeding allows for extensions of timeframes for good cause with written notice to the reporting party and the accused of the delay and the reason for the delay.

SLU-Madrid and University officials involved in the investigation or adjudication of domestic violence, dating violence, sexual assault and stalking complaints are trained annually on the issues related to domestic violence, dating violence, sexual assault and stalking as well as how to conduct an investigation and hearing process that protects the safety of all participants and promotes accountability.

Furthermore, SLU-Madrid’s policies comply with the Clery Act requirements and provide that:

- The reporting party and the accused will have timely notice for meetings at which the reporting party or accused, or both, may be present;
- The reporting party, the accused and appropriate officials will have timely and equal access to any information that will be used during formal and informal disciplinary meeting and hearings;
- The institutional disciplinary procedures will not be conducted by officials who have a conflict of interest or bias for or against the accuser or the accused;
- The reporting party and the accused will be notified simultaneously, in writing, of the any initial, interim, and final decision of any disciplinary proceeding; and

- Where an appeal is permitted under the applicable policy, the reporting party and the accused will be notified simultaneously in writing, of the procedures for the accused and the victim to appeal the result of the institutional disciplinary proceeding. When an appeal is filed, the reporting party and the accused will be notified simultaneously of the outcome of the appeal in writing of any change to the result prior to the time that it becomes final as well as of the final result once the appeal is resolved.

Additionally, as described in SLU-Madrid’s Community Standards and Conduct Process, what follows outlines the conduct process for a Student who has allegedly committed a suspendable offense or a Sexual Misbehavior violation.

1. The Director of Student Life, or designee, will investigate the violation.
2. The Director of Student Life, or designee, will be assigned as the Hearing Officer for the case.
3. Throughout the process, a reporting party or accused party may have an advisor provided by SLU-Madrid or an advisor of their choice present at any meeting related to the investigation or disciplinary proceeding. An advisor of choice may include an attorney of their choosing at their own expense. An advisor provided by SLU-Madrid will be trained about SLU-Madrid policies, procedures, and resources. Any person who serves as an advisor should plan to make themselves available for meetings throughout the process. Advisors can participate in the resolution process in an advisory capacity, but they may not take part directly in the hearing itself and must demonstrate appropriate behavior. SLU-Madrid has the right at all times to determine what constitutes appropriate behavior on the part of an advisor. If a party wishes to speak privately with their advisor during the hearing, they may request a brief recess from the meeting or proceeding. The advisor may not be a fact witness or otherwise have any conflicting role in the process.
4. A hearing notification letter will be sent by the Hearing Officer to the accused party containing the alleged violation(s) and hearing details (time, day, location, etc.).
5. The Hearing Officer will meet with the accused party to discuss their rights as a SLU-Madrid student, the incident, and review the violations/charges. The accused party may take responsibility, be found responsible, or be found not responsible for violating the Community Standards. If the accused party takes responsibility or is found responsible, the Hearing Officer will assign appropriate sanctions and outline the Appeal Process. In determining whether the accused party is responsible, a Hearing Officer will apply the preponderance of the evidence standard (more likely than not).
6. The Hearing Officer may impose any sanctions deemed appropriate under the circumstances and consistent with SLU-Madrid Policy. In determining the appropriate sanction(s), the Hearing Officer may consider the following factors:
  - a. The nature and violence of the conduct at issue;
  - b. The impact of the conduct on the reporting party;
  - c. The impact or implications of the conduct on the community or the University;
  - d. Prior misbehavior by the accused, including the accused’s relevant prior discipline history;
  - e. Whether the accused has accepted responsibility for the conduct;
  - f. Maintenance of a safe and respectful environment conducive to learning;
  - g. Protection of the University community; and, any other mitigating, aggravating or compelling circumstances in order to reach a just and appropriate resolution in each case
7. Barring extenuating circumstances, both the reporting and accused parties will be notified of the outcome of the hearing via email within fourteen (14) business days. The outcome letter will include:

- a. The finding(s) (responsible/not responsible);
  - b. Sanctions, if appropriate; and
  - c. The appeal process.
8. The grounds for appeal may only be based upon the following:
    - a. There was a material deviation from the procedures set forth in the Community Standards that would significantly impact the outcome of the case or may have resulted in a different finding;
    - b. New or relevant information, not available at the time of the hearing, has arisen that would significantly impact the outcome of the case.
    - c. Dissatisfaction with the outcome of the investigation, and failure of a party or witness to attend or participate in the investigation or hearing process, are not grounds for appeal.
  9. As a general rule, neither the sanctions resulting from a disciplinary decision nor any change in the status of a student will be enforced until the appeal has been fully considered. However, each matter will be considered on a case-by-case basis, taking into account, among other things, the health and safety of individual community members and/or the community as a whole.
  10. Appeals must be submitted within three (3) business days from the date on the outcome letter using the Community Standards Appeal Form. If an appeal is not received within three (3) business days, the Hearing Officer's determination is final.
  11. Appeals under this section will be heard by the ad-hoc SLU-Madrid Appeal Board (see Section 1.15 of the Community Standards document). The decision by the Appeal Board is the final decision in the case.

Whether or not criminal charges are filed, SLU-Madrid or any member of its community may file a report under the following policies, depending upon the status of the accused.

**For employees (faculty and staff):**

- **Name of Policy:** [SLU-Madrid Workplace Harassment Protocol of Action](#)
- **How to file a complaint under this policy:** File complaints with Human Resources; email [hr-madrid@slu.edu](mailto:hr-madrid@slu.edu) or phone: 91 554 58 58, ext. 211.
- **Major steps in the policy are:**
  1. Formal report filed with the appropriate administrator.
  2. Administrator (can be Director of OIED, to determine if there is a serious or continuing threat that may require the issuance of timely warning).
  3. Immediate and thorough investigation by appropriate administrator or designee.
  4. Notification to accused and appropriate officer/staff that supervise the accused.
  5. Written report issued by investigator summarizing investigation, identifying findings of fact, and stating whether the complaint has been substantiated by a preponderance of the evidence standard. This report will also include any recommendations as to appropriate disciplinary and/or remedial action if prohibited conduct occurred.
  6. Report provided to complaining party, accused, and the appropriate Supervisor who is responsible for implementing remedial measures.
  7. Informal resolution may be used in lieu of formal investigation and determination. When utilizing the informal complaint process, the appropriate administrator will explain University policies and procedures regarding discrimination and harassment, assist the complaining party in evaluating a wide variety of options for informally resolving

complaints, serve as a facilitator between parties, and refer individuals to other campus resources and/or counseling as needed or requested.

- **Anticipated timeline:** Investigation will be prompt, thorough, and impartial.
- **Decision-making process:** Investigation by the appropriate administrator or designee familiar with the policy and the available consequences that may be recommended. The investigator makes a recommendation on whether the policy was violated, using the preponderance of evidence standard. The investigator may also recommend corrective actions. The appropriate Supervisor is responsible for ultimately determining whether disciplinary action is warranted and invoking the applicable University disciplinary policies and procedures.
- **Resolution options (how SLU-Madrid decides which process to use):** All allegations involving faculty/staff engaged in Domestic Violence, Dating Violence, Sexual Assault and Stalking will be addressed using this procedure.

Sanctions	Sexual Assault	Domestic Violence	Dating Violence	Stalking
Formal Warning	X	X	X	X
Mandatory Training and Education	X	X	X	X
Transfer	X	X	X	X
Demotion	X	X	X	X
Suspension	X	X	X	X
Probation	X	X	X	X
Separation from SLU-Madrid	X	X	X	X

### For Students

- **Name of Policy:** [SLU-Madrid Community Standards](#)
- **How to file a complaint under this policy:** File complaints by notifying the Director of Student Life; email [studentlife-madrid@slu.edu](mailto:studentlife-madrid@slu.edu) or phone: 91 554 58 58, ext. 214. Complaints reported to any SLU-Madrid faculty or staff member will be reported to the Director of Student Life so that the reporting party has access to all available resources on and off campus.
- **Major Steps in the Conduct Process:**
  1. SLU-Madrid registered students, faculty and staff can report [Community Standards](#) violations to the Director of Student Life.
  2. Accused parties who have been involved in a potential policy violation will be contacted by email and asked to attend an individual hearing about their conduct. During this individual hearing, the student will have the opportunity to discuss the incident with a SLU-Madrid hearing officer, a staff member who investigates and determines responsibility of any violations.

3. Failure to attend this meeting will result in the case being decided in the student's absence, as well as a failure to comply violation, an additional Community Standard violation on the student's record that may result in a registration hold being placed on the student's account.
4. Should the student accept responsibility or be found responsible for the charges, the student may receive sanctions. These are outcomes designed to educate students about how the student's actions impact both the student and others.
5. After the student receives the Hearing Outcome Letter, the student has three days to submit a Community Standards Appeal Form.

*Differences from a Legal Process*

- SLU-Madrid's conduct process is designed to teach our students to accept responsibility for their actions, to help them realize the impact of their decisions and to foster positive community values.
- For any of these goals to be attained, students must represent themselves in our conduct process. Attorneys are not permitted to be part of conduct hearings as they would be in a civil or criminal court. Decisions about responsibility are made with a preponderance of the evidence, or "more likely than not," standard.

*Consequences of violating SLU-Madrid Community Standards:*

Sanctions are assigned based on the violation and the frequency of the violation. They can include:

- Written Admonition
- Counseling referrals
- Restitution
- Community service
- Restricted access
- Loss of SLU-Madrid privileges
- Housing probation (restrictions on access to the host family)
- Loss of scholarships
- Loss of the ability to be a campus leader, including a campus ambassador, club leader, or SGA officer
- Probation
- Suspension
- Expulsion
- For more severe policy violations, such as sexual assault or repeated violations, students can face suspension or expulsion.

Notification of Outside Parties: When deemed appropriate, SLU-Madrid reserves the right to notify a student's parents or guardians at any time during a disciplinary process. SLU-Madrid also reserves the right to notify the student's home campus authorities of any inappropriate conduct and of any sanctions imposed. The decision to notify the student's home campus will be communicated beforehand in writing to the student. The student

involved may appeal that decision in writing to the highest-ranking administrator no later than two days after the student has received formal notification of the intent to communicate.

Policies/Protocols related to Community Standards:

Host-Family Norms: Expectations and Information for the Host Family Relationship

- **Anticipated timeline:** Investigation and hearing will be prompt, thorough and impartial.
- **Decision-making process:** A fair, thorough and impartial investigation and hearing will be conducted by a trained Hearing Officer. The Hearing Officer will give both parties an opportunity to meet with him/her. The Hearing Officer will make the final determination, using the preponderance of evidence, as to the responsibility and if a finding of responsibility is made, will impose sanctions. Both parties have the right to appeal the decision.
- **Resolution options (how SLU-Madrid decides which process to use):** Resolutions will be determined utilizing the SLU-Madrid Community Standards.

Sanction	Sexual Assault	Domestic Violence	Dating Violence	Stalking
Educational Sanctions	X	X	X	X
Counseling	X	X	X	X
Restriction of campus privileges, including housing, participation in student activities, etc.	X	X	X	X
Mandated counseling, which may include anger managements; alcohol/drug education, etc.	X	X	X	X
Disciplinary probation	X	X	X	X
Suspension	X	X	X	X
Expulsion	X	X	X	X

**University-Initiated Protective Measures:** In addition to those protective measures previously described, the Director of Student Life, or designee, will determine whether interim interventions and protective measure should be implemented, and, if so, take steps to implement those protective measures as soon as possible. Examples of interim protective measures include but are not limited to:

- A SLU-Madrid order of no contact;
- residence relocation;
- adjustment of course schedules;
- a leave of absence;
- reassignment to a different supervisor or position.

These remedies may be applied to one, both or multiple parties involved. Violations of the Director of Student Life directives and/or protective measures will constitute related violations that may lead



to additional disciplinary action. Protective measures imposed may be temporary pending the results of an investigation or may become permanent as determined by SLU-Madrid.

### **Information about Sexual Assault in Madrid Provided by the U.S. Embassy in Spain**

This section includes – with some adjustments – information provided by the U.S. Embassy in Spain related to sexual assault in Spain.

According to the U.S. Department of Justice, sexual assault is “any type of sexual contact or behavior that occurs without the explicit consent of the recipient.” If you are a victim of a sexual assault:

- Try to get to a safe place, far away from the aggressor.
- Contact someone who can help you, such as a friend, family member, or the police. You can contact the police in Spain by calling 112.

If you are the victim of a sexual assault in Madrid:

1. If you need urgent medical attention: Call 112, ask for an English-speaking operator, and explain your situation. 112 operators will direct you to the closest police station or medical facility to assist you.
2. If you decide to report the assault: You must go to a specialized police station. For assaults that happened in Madrid, go to UFAM, the specialized Spanish National Police unit that handles sexual assault and rape, located at Calle Dr. Federico Rubio y Gali 55 (phone: 91 322 3554). This office is open 24 hours per day, seven days per week. You may request an English-language interpreter at the police station at any time. Reporting a sexual assault may take a long time. If possible, have someone accompany you through the reporting process [Student Life staff are an option for SLU-Madrid students].
3. What to expect at the police station: Reporting a sexual assault at the police station means you give a statement about the assault to a police officer (male or female, depending on availability). The officer may ask questions to clarify any part of the report. Read the report carefully. Sign it only when it says what you want it to say. After you have given your statement, you will be informed in writing of your rights as a sexual assault victim, next steps in the process. You will then be taken to the La Paz Hospital for a sexual assault forensic exam. In some cases, over the next few days, you may be required to participate in a crime scene walkthrough, lineup identification, or confirm your statement in front of an investigating judge. If you have any questions about the process, contact the Embassy at 91 587 2200 or by email: [askACS@state.gov](mailto:askACS@state.gov).
4. What to expect at the hospital: In Madrid, victims of sexual assault are typically taken to the La Paz hospital located at Paseo Castellana 261 after reporting the crime. La Paz Hospital will not perform a sexual assault forensic exam unless the assault has already been reported to the police. This procedure may be different outside of Madrid, and you should consult with the local police by calling 112 before going to the hospital. The hospital should treat you for any injuries that you may have suffered and should conduct blood tests and a gynecological examination. The reports of the medical examination may become part of the criminal investigation, as forensic evidence. The examination may take a significant amount of time and include periods of waiting. Experts recommend not to shower or wash clothes to preserve evidence after a sexual assault. At La Paz Hospital in Madrid, the medical

examination, any follow-up visits, all tests, and any medication will be provided free of charge.

5. Medical attention when you do not want to report to the police: You may seek free medical attention related to a sexual assault at certain clinics in Madrid, for example at Centro Sandoval, located at Calle Sandoval 7 (open Monday – Friday 8:30 a.m. to 12 noon without an appointment). Please note that these clinics will provide treatment for injuries related to the assault but will not perform a sexual assault forensic exam.
6. Criminal justice system: The U.S. and Spanish legal systems are different. Unlike in the United States, in Spain, a court and a judge will become involved in most cases from the beginning. The investigating judge (*juez de instrucción*) is similar to a prosecutor in the United States. You may be asked to appear in front of this judge to confirm your statement at an early stage of the case. After the phase with the investigating judge, the case may be tried. The trial will take place in a different court, with a panel of three judges or a jury. As a victim, you do are not required to retain an attorney, but Spanish law allows for that possibility. If you do retain one, the attorney will be able to inform you of the different motions and steps in the procedure. You can find a list of English-speaking attorneys by referring to the Embassy website. There are some advocacy organizations that will help you, at no cost, to navigate the judicial system. Their resources are limited, and they may not always have English speakers on staff. In Madrid, you may reach CIMASCAM, at Doctor Santero, 12, phone: 915 340 922
7. Contact us: Call the Embassy at 91 587 2200, and we will direct you to local resources that can best help you. This number is answered 24/7, year-round. We publish a list of English-speaking doctors, attorneys, and translators on our website that may be of assistance. If you have any questions about the process, next steps, or other issues that do not require an immediate response, email us at [askACS@state.gov](mailto:askACS@state.gov) and we will get back to you the next working day.

### **Adam Walsh Child Protection and Safety Act (Sex Offender Registration)**

The Adam Walsh Child Protection and Safety Act of 2006 (42 U.S.C 16921) is a U.S. federal law that enables the tracking of sex offenders. This law requires authorities in each U.S. state to provide the public with a list of registered sex offenders. The government of Spain does not require convicted sex offenders to register with local authorities; therefore, no sex offender information is available.

### **Crime Statistics for SLU-Madrid**

SLU-Madrid has requested crime statistics from Spain’s police authorities each year for the past three years. Their response has been that they do not provide reports on these matters for specific locations, such as the reportable areas for Clery Act purposes. They direct all inquiries to the general data on Spain’s crime statistics webpage. This webpage does not specify certain areas in Madrid but provides general crime information about the entire city of Madrid and Spain.

The crime statistics below include only those crimes reported from SLU-Madrid’s Campus Security Authorities.

This report reflects the Clery crime statistics for the past three calendar years (2019-2021).

**Crime Statistics**

<b>OFFENSE</b>	<b>Year</b>	<b>Residential Facilities*</b>	<b>On-campus Locations (includes residential facilities)</b>	<b>Non-campus Locations</b>	<b>Public Property</b>	<b>Total**</b>
MURDER, NON-NEGLIGENT MANSLAUGHTER	2019	0	0	0	0	0
	2020	0	0	0	0	0
	2021	0	0	0	0	0
MANSLAUGHTER BY NEGLIGENCE	2019	0	0	0	0	0
	2020	0	0	0	0	0
	2021	0	0	0	0	0
RAPE	2019	0	0	0	0	0
	2020	0	0	0	0	0
	2021	0	0	0	0	0
FONDLING	2019	0	0	0	0	0
	2020	0	0	0	0	0
	2021	0	0	0	0	0
INCEST	2019	0	0	0	0	0
	2020	0	0	0	0	0
	2021	0	0	0	0	0
STATUTORY RAPE	2019	0	0	0	0	0
	2020	0	0	0	0	0
	2021	0	0	0	0	0
ROBBERY	2019	0	0	0	0	0
	2020	0	0	0	0	0
	2021	0	0	0	0	0
AGGRAVATED ASSAULT	2019	0	0	0	0	0
	2020	0	0	0	0	0
	2021	0	0	0	0	0
BURGLARY	2019	0	0	0	0	0
	2020	0	0	0	0	0
	2021	0	0	0	0	0
MOTOR VEHICLE THEFT	2019	0	0	0	0	0
	2020	0	0	0	0	0
	2021	0	0	0	0	0
ARSON	2019	0	0	0	0	0
	2020	0	0	0	0	0
	2021	0	0	0	0	0

\*In the 2020-21 academic year, SLU-Madrid had a first-year housing requirement with Residencia Universitaria El Faro of Yugo (formerly Nexo); fall entering first-year students were housed at Residencia Universitaria El Faro for their full first academic year. SLU-Madrid no longer has a first-year housing requirement.

\*\*Since statistics for “Residential Facilities” are included in “On-Campus Facilities,” the “Total” will be the sum of “On-campus Locations,” “Non-campus Locations,” and “Public Property.”

### ***Arrests and Referrals for Disciplinary Action***

<b>OFFENSE</b>	<b>Year</b>	<b>Residential Facilities*</b>	<b>On-campus Locations (includes residential facilities)</b>	<b>Non-campus Locations</b>	<b>Public Property</b>	<b>Total**</b>
ARRESTS: WEAPONS: POSSESSING, ETC.	2019	0	0	0	0	0
	2020	0	0	0	0	0
	2021	0	0	0	0	0
DISCIPLINARY REFERRALS: WEAPONS: POSSESSING, ETC.	2019	0	0	0	0	0
	2020	0	0	0	0	0
	2021	0	0	0	0	0
ARRESTS: DRUGS	2019	0	0	0	0	0
	2020	0	0	0	0	0
	2021	0	0	0	0	0
DISCIPLINARY ACTION: DRUGS	2019	0	0	0	0	0
	2020	0	0	0	0	0
	2021	0	0	0	0	0
ARRESTS: LIQUOR LAW VIOLATIONS	2019	0	0	0	0	0
	2020	0	0	0	0	0
	2021	0	0	0	0	0
DISCIPLINARY ACTION: LIQUOR LAW VIOLATIONS	2019	0	0	0	0	0
	2020	0	0	0	0	0
	2021	0	0	0	0	0

\*In the 2020-21 academic year, SLU-Madrid had a first-year housing requirement with Residencia Universitaria El Faro of Yugo (formally Nexo); fall entering first-year students were housed at Residencia Universitaria El Faro for their full first academic year. SLU-Madrid no longer has a first-year housing requirement.

\*\*Since statistics for “Residential Facilities” are included in “On-Campus Facilities,” the “Total” will be the sum of “On-campus Locations,” “Non-campus Locations,” and “Public Property.”

### ***Dating Violence, Domestic Violence, Stalking***

<b>OFFENSE</b>	<b>Year</b>	<b>Residential Facilities*</b>	<b>On-campus Locations (includes residential)</b>	<b>Non-campus Locations</b>	<b>Public Property</b>	<b>Total**</b>
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			facilities)			
DATING VIOLENCE	2019	0	0	0	0	0
	2020	0	0	0	0	0
	2021	0	0	0	0	0
DOMESTIC VIOLENCE	2019	0	0	0	0	0
	2020	0	0	0	0	0
	2021	0	0	0	0	0
STALKING	2019	0	0	0	0	0
	2020	0	0	0	0	0
	2021	0	0	0	0	0

\*In the 2020-21 academic year, SLU-Madrid had a first-year housing requirement with Residencia Universitaria El Faro of Yugo (formally Nexo); fall entering first-year students were housed at Residencia Universitaria El Faro for their full first academic year. SLU-Madrid no longer has a first-year housing requirement.

\*\*Since statistics for “Residential Facilities” are included in “On-Campus Facilities,” the “Total” will be the sum of “On-campus Locations,” “Non-campus Locations,” and “Public Property.”

### Hate Crimes

- 2019: No hate crimes were reported.
- 2020: No hate crimes were reported.
- 2021: No hate crimes were reported.

### Unfounded Crimes

If a crime is reported as occurring On-Campus, Non-Campus or on Public Property, and the reported crime is investigated by law enforcement authorities and found to be false or baseless, the crime is considered to be “unfounded.” Only sworn or commissioned law enforcement personnel may unfound a crime.

- 2019: No reported crimes were unfounded.
- 2020: No reported crimes were unfounded.
- 2021: No reported crimes were unfounded.

### Crime Log

Since the Madrid campus does not have police or security personnel on-site there is no requirement to maintain a daily crime.

### Missing Students Who Reside in On-Campus Housing

Note: SLU-Madrid does not operate on-campus housing. If a member of the SLU-Madrid community has reason to believe that a student is missing for more than 24 hours, they should immediately notify the Office of Student Life at 91 554 5858, ext. 213 (during working hours) or 638 763 758 (after hours). All SLU-Madrid faculty and staff are required to notify Student Life immediately upon being notified about a missing student. The Student Life Office will generate a missing person report and initiate an investigation. Since the SLU-Madrid campus does not have a police or security

department, an official missing student report will also be referred immediately to the local law enforcement agency that has jurisdiction in the area unless they are the entity that made the determination that the student is missing.

After investigating the report, should it be determined the student is missing, SLU-Madrid will notify the student's confidential contact no later than 24 hours after the student is determined to be missing. Even if the student hasn't registered a confidential contact, is above the age of 18, or is an emancipated minor, SLU-Madrid will contact the police department that has jurisdiction in the area that the student is missing within 24 hours.

If the student is under the age of 18 and is not an emancipated individual, SLU-Madrid will notify the student's parent or legal guardian within 24 hours of the determination the student is missing, in addition to notifying any additional contact person designated by the student.

All students must register in Banner an emergency contact. In addition, students residing partner residences operated by Yugo, such as Residencia Universitaria El Faro, have the option to identify confidentially an individual to be contacted by SLU-Madrid in the event the student is determined to be missing more than 24 hours. Students who wish to identify a confidential contact can do so by entering this information along with their housing applications. This information is confidential, accessible by authorized campus officials and law enforcement only, and will not be disclosed outside of a missing person investigation.

Should the investigation determine the student is missing prior to 24 hours, these procedures will be implemented immediately.

### **Policies Students Should Follow in Case of Fire**

Your worst enemy during a fire is smoke. If you're surrounded by smoke, get down on the floor and crawl to safety. Hold your breath and close your eyes if you can. Close doors behind you as you escape. Always use stairs to escape. Never use an elevator.

Here are a few simple fire safety tips:

- Know what your fire alarm sounds like.
- Know where pull stations are located.
- When you see a fire, sound the alarm.
- Be prepared to identify the size of the fire and location.
- Exit the building as safely and quickly as possible from the nearest exit. (In any building you should know where at least two exits are.)
- Close all doors as you leave the building.
- Do not use the elevators for any reason.
- If you need assistance, develop a buddy plan with someone else to help expedite safe exit.
- Notify others in the immediate area about the fire as you are leaving.
- Do not enter a building that is on fire or that the fire alarm is sounding in.
- Do not re-enter a building that you have evacuated for any reason.
- Never prop open or lock a fire exit door.
- Report any vandalism to any of the fire safety equipment in your building.
- It mandatory for all students to exit the building when a fire alarm is sounding.

## Fire Log

SLU-Madrid students were residing at El Faro in 2021 from January through May; a fire log was maintained at the front desk and was available for inspection during normal business hours. The fire log included: the date and time any fire was reported, the date and time any fire occurred, its nature, and its general location in residential halls. Note that this fire log only applied to fires that occur in El Faro. There were no fires reported at this location from January 2021 through May 2021 and no fire drills were completed during that time frame.

SLU-Madrid makes available the most recent 60 days of any Fire Logs. If you wish to view logs older than 60 days, contact the Office of Student Life, located at Avenida del Valle, 28; phone: 91 554 5858, ext. 213, during working hours. No fire log information will directly or indirectly identify a victim or a witness.

## Fire Statistics

The Higher Education Opportunity Act, enacted on August 14, 2008, requires institutions that maintain on-campus student housing facilities to publish an annual fire safety report that contains information about campus fire safety practices and standards of the institution. The fire statistics are for the three most recent calendar years.

### 2019-21 Fire Statistics for On-campus Student Housing Facilities

2019	Total # of fires	Fire #	Cause	Injuries	Deaths	Property Damage Value
Residencia Universitaria El Faro Plaza Cristo Rey 7 – Madrid	0	0	NA	0	0	0
2020	Total # of fires in each bldg.	Fire #	Cause	Injuries	Deaths	Property Damage Value
Residencia Universitaria El Faro Plaza Cristo Rey, 7 - Madrid	0	0	NA	0	0	0
2021	Total # of fires in each bldg.	Fire #	Cause	Injuries	Deaths	Property Damage Value
(January 1, 2021 – May 31, 2021)						
Residencia Universitaria El Faro Plaza Cristo Rey, 7 - Madrid	0	0	NA	0	0	0

SLU-Madrid no longer has an agreement with Yugo (formerly Nexo) to house its students; thus, SLU-Madrid no longer requests or reports Fire Statistics from EL Faro or will publish fire procedures and policies in the annual security and fire safety report.

## Clery Act Crime Definitions

*Murder/Non-Negligent Manslaughter*: the willful (non-negligent) killing of one human being by another. NOTE: Deaths caused by negligence, attempts to kill, assaults to kill, suicides, accidental deaths, and justifiable homicides are excluded.

*Negligent Manslaughter:* the killing of another person through gross negligence.

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

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

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

*Motor Vehicle Theft:* The theft or attempted theft of a motor vehicle. (Classify as motor vehicle theft all cases where automobiles are taken by persons not having lawful access, even though the vehicles are later abandoned – including joy riding)

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

*Weapon Law Violations:* The violation of laws or ordinances dealing with weapon offenses, regulatory in nature, such as: manufacture, sale, or possession of deadly weapons; carrying deadly weapons, concealed or openly; furnishing deadly weapons to minors; aliens possessing deadly weapons; all attempts to commit any of the aforementioned.

*Drug Abuse Violations:* Violations of state and local laws relating to the unlawful possession, sale, use, growing, manufacturing, and making of narcotic drugs. The relevant substances include: opium or cocaine and their derivatives (morphine, heroin, codeine); marijuana; synthetic narcotics (Demerol, methadone's); and dangerous non-narcotic drugs (barbiturates, Benzedrine).

*Liquor Law Violations:* The violation of laws or ordinance prohibiting: the manufacture, sale, transporting, furnishing, possessing of intoxicating liquor; maintaining unlawful drinking places; bootlegging; operating a still; furnishing liquor to minor or intemperate person; using a vehicle for illegal transportation of liquor; drinking on a train or public conveyance; all attempts to commit any of the aforementioned. (Drunkenness and driving under the influence are not included in this definition.)

*NOTE: The above listed crime definitions from the Uniform Crime Reporting (UCR) Handbook*

## Sex 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, including instances in which the victim is incapable of giving consent.



*Fondling:* The touching of the private body parts of another person for the purpose of sexual gratification, forcibly and/or against that person's will; or, not forcibly or against the person's will where the victim is incapable of giving consent because of his/her youth or because of his/her temporary or permanent mental incapacity.

*Incest:* Non-forcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

*Statutory Rape:* Non-forcible sexual intercourse with a person who is under the statutory age of consent.

*NOTE: The above listed crime definitions from the Uniform Crime Reporting (UCR) Handbook, 2013 Revised UCR definition of Rape, as prescribed by 2014 Violence Against Women Act (VAWA) Negotiated Rulemaking Final Consensus Language.*

## Hate Crimes

SLU is also required to report statistics for hate (bias) related crimes by the type of bias as defined below for the following classifications: murder/non-negligent manslaughter, negligent manslaughter, sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, arson (see definitions above) and larceny, vandalism, intimidation, and simple assault (see definitions below).

*Larceny:* The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another.

*Vandalism:* To willfully or maliciously destroy, injure, disfigure, or deface any public or private property, real or personal, without the consent of the owner or person having custody or control by cutting, tearing, breaking, marking, painting, drawing, covering with filth, or any other such means as may be specified by local law.

*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.

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

If a hate crime occurs where there is an incident involving intimidation, vandalism, larceny, simple assault or other bodily injury, the law requires that the statistic be reported as a hate crime even though there is no requirement to report the crime classification in any other area of the compliance document. A hate or bias related crime is not a separate, distinct crime, but is the commission of a criminal offense which was motivated by the offender's bias. For example, a subject assaults a victim, which is a crime. If the facts of the case indicate that the offender was motivated to commit the offense because of his bias against the victim's race, sexual orientation, etc... the assault is then also classified as a hate/bias crime.

## Other Offenses

*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:

- (1) The existence of such a relationship shall be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.
- (2) For the purpose of this definition, dating violence includes but is not limited to, sexual or physical abuse or the threat of such abuse and does not include acts covered under the definition of domestic violence.

*Domestic Violence:* A felony or misdemeanor crime of violence committed:

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

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

- (1) Fear for the person's safety or the safety of others; or
- (2) Suffer substantial emotional distress.
- (3) For the purpose of this definition, Course of conduct means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method device, or means follows, monitors, observes, surveils, threatens, or communicates to or about, a person, or interferes with a person's property. Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling. Reasonable person means a reasonable person under similar circumstances and with similar identities to the victim.
- (4) Report the location as where a perpetrator engaged in the stalking course of conduct or where a victim first became aware of the stalking.
- (5) Report any additional behaviors that meet the above definition of Stalking if they occur or continue to occur after an official intervention has been put in place, including, but not limited to, an institutional disciplinary action or the issuance of a no contact order, restraining order or any warning by the institution or a court.

*NOTE: Additions from 2014 Violence Against Women Act (VAWA) Negotiated Rulemaking Final Consensus Language*