

WFI
CITY
COLLEGE

2018 ANNUAL SAFETY & SECURITY REPORT

WITH POLICIES ON

- SAFETY & SECURITY
- DISCRIMINATION
- HARASSMENT
- SEXUAL ASSAULT AWARENESS AND PREVENTION
- ALCOHOL AND DRUG AWARENESS AND PREVENTION
- POSSESSION & USE OF ALCOHOL AND DRUGS

Donna Stirber | Published October 1, 2018 | Replaces October 2017 Publication

WFI CITY COLLEGE | 4322 North 5th Street | Philadelphia, PA 19140 | T 215.455.2300 | <https://www.wficitycollege.org>

TABLE OF CONTENTS

Part I: Clery Act Reporting Compliance | Student Right to Know

Introduction	1
Annual Security Report	2
Safety and Security Declarations and Personal Responsibility	2
Expanded Information and Policies Related to Sexual Harassment	2
Non-Campus Buildings	3
Maintenance of Leased Space	3
Campus Security Authority	3
Crime Log	5
Reportable Offenses	6
Crime Statistics	7
Reporting Criminal Activity Campus Security Information	8
Timely Crime Alerts to The Institutional Community	8
Monitoring Student Off-Campus Criminal Activity	9
Fires and Hazardous Material Report	9

Part II: Safety & Security of Students, Faculty, Staff & Visitors

Crime Prevention Initiatives	10
Emergency Action Plan (EPA) Response, Notification and Testing Policy	11
General Emergency Instructions and Calling 9-1-1	12
Building Evacuation Procedures	12
Immediate Response to an Active Shooter	16
Law Enforcement Response to Active Shooter	18
What to Do When Law Enforcement Arrives	18
Lockdown	19
Shelter in Place	19
Crime Prevention and Safety Guidelines	20

Part III: Discrimination, Harassment and Sexual Assault

Definitions	22
What is Sexual Assault	24
Facts About Sexual Assault	24

Harassment, Discrimination, and Sexual Assault Policy	26
Reporting Prohibited Conduct to the Institute	27
Complainant Rights	28
Investigation	28
Initial Resolution Process	29
Summary Suspension	30
Investigations Outcomes	30
Appeals Process	31
Reporting a Prohibited Consensual Relationship	32
Part IV: Sexual Assault Awareness and Prevention	
What to Do if You are Sexually Assaulted	33
Resources	34
Reduce the Chance of Assault	35
Bystander Intervention	36
Registered Sex Offender Information	37
Part V: Alcohol & Drug Policies Prevention Program	
WFI City College Alcohol and Drug Policies	38
Facts and Implications	39
Federal Penalties for illegal Possession of a Controlled Substance	40
Penalties for Illegal Possession in The Commonwealth of Pennsylvania	41
WFI Drug and Alcohol Awareness Program	41



The information policies and procedures contained in the Annual Security Report are subject to change without notice. The most up to date information, policies and procedures are found on WFI City College's website.



Part I: Compliance | 2017 Annual Safety and Security Report

INTRODUCTION

Keeping students and staff safe is a WFI City College priority. Each year, WFI City College publishes and distributes our ***Annual Safety and Security Report***, delivering important safety and security information, as well as crime statistics for the past three years. Although WFI City College has a campus, it does not have campus housing. This report encompasses all data for our school.

What You'll Find in The Report

In compliance with the federal Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act), we publish a security report by October 1st every year. Each report documents the past three calendar years of crime statistics, security policies and procedures, and information on the fundamental rights guaranteed victims of sexual assault. WFICC reports crime statistics using data obtained in cooperation with local and state law enforcement agencies.

Emergency Notifications

WFI City College assigned security authority will notify students and employees about potential threats and emergencies using emails, text messaging or other appropriate media. Notifications will be sent as quickly as possible unless issuing a warning may compromise efforts to assist a victim, or to contain, respond to, or otherwise mitigate the emergency.

New Information About Sexual Assault Prevention and Awareness

Colleges and universities alike across the country are taking crimes involving sexual assault and violence very seriously, and WFI City College has joined them by initiating programs and policies designed to raise awareness, prevent and prohibit domestic violence, dating violence, sexual assault, and stalking. Our Annual Security report includes an unprecedented amount of information on issues, including awareness and prevention, bystander intervention, reporting sexual assault and much more so that WFICC can remain a safe, secure environment in which to learn and work.

<https://www.youtube.com/watch?v=xLdElcv5gqc> is a link to a video entitled ***1 is 2 Many PSA: 60 Seconds***. The video is produced by the White House to highlight the importance of bystander intervention.

The ***2018 Annual Campus Safety and Security Report*** and our current ***Crime Statistic Report*** are available to prospective and current students, faculty and staff electronically and in print. The Report(s)

are available to download directly from our website, <https://www.wficitycollege.org>. Print copies are available by request. Direct the submission by email to Ms. Madeline Sargent, at madeline.sargent@wficitycollege.org. Please include your current mailing address, email address and telephone number within the body of your email. WFI City College will send the printed Report(s) to the address provided.

I. ANNUAL SECURITY REPORT

In accord with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act), this annual security report contains important safety and security information about WFI City College as well as crime statistics for the previous three calendar years. Under federal law, this report is prepared by WFI City College each year and provided to all current students and employees. It is available to prospective students and the public to view or download as a printable PDF under the *Consumer Information* tab on the school website, <http://www.wficitycollege.org>. A print copy is available by request. Direct the submissions by email to Ms. Madeline Sargent, at madeline.sargent@wficitycollege.org. To receive a print copy, include your current mailing address, email address and telephone number in the body of your email. WFI City College will send the printed report(s) to the address provided.

A. SAFETY AND SECURITY DECLARATIONS AND PERSONAL RESPONSIBILITY

WFI City College is committed to providing its students and employees a safe and secure environment to learn and work. In addition to reading and understanding the policies and information contained within this report, students and employees of WFI City College are encouraged to take personal responsibility for their safety and security and to immediately report all suspected criminal activity and emergencies to the police by dialing 9-1-1.

B. EXPANDED INFORMATION AND POLICIES RELATED TO SEXUAL HARASSMENT

1. In compliance with the Violence Against Women Act (VAWA), now a provision of the Clery Act, WFICC has added information on Sexual Assault Awareness and Prevention to its Annual Security Report. The information provided applies to WFI City College students, employees, visitors and contractors.
2. The information defines a range of offenses related to sexual assault, including domestic violence, harassment, stalking, dating violence. These offenses and all other prohibited acts, including language, and behaviors of a sexual nature create an intimidating, hostile, or offensive educational environment and interfere with academic performance.
3. Included in the information are WFI City College official policies and procedures for reporting prohibited acts and allegations.

- a. WFI City College policies and procedures describe investigative procedures including response to compliant and sanctions WFICC imposes on offenders.
 - b. It outlines protective measures WFICC offers to victims following a complaint of sexual harassment, as well as a written explanation of a victim's rights and option, as well as written notification of counseling, health, legal assistance, and other services available to victims.
4. It includes statistics for each sexual harassment crime category.

C. NON-CAMPUS BUILDING OR PROPERTY

1. The *Clery Act* defines non-campus buildings and properties as any *building or property owned or controlled by a student organization that is officially recognized by the institution; or any building or property owned or controlled by an institution that is used in direct support of, or in relation to, the institution's educational purposes, is frequently used by students, and is not within the same reasonably contiguous geographic area of the institution.*
2. WFI City College leases its facilities from and shared the premise of 4322 N. 5th Street, Philadelphia PA 19140 with ASPIRA of PA. WFICC does not provide on or off-campus housing facilities and does not maintain control over any other facilities for its educational purposes or frequently used by its students.

D. MAINTENANCE OF LEASED SPACE

1. WFI City College leases its premises from ASPIRA of PA the owner and co-occupant of the facilities. The building facilities manager is responsible for overseeing general repairs.
2. Faculty, staff, and students should report anything in the facilities that present a danger or risk for injury to the Campus Director. All such reports funnel to the Senior Security Authority who will notify the Building Facilities Manager of the repairs needed. Safety issues include but are not limited to a wet or slippery floor, a broken window, or faulty locking mechanism.
3. The Campus Senior Security Authority maintains a LOG of all complaints of danger or risk of inquiry in the facility. The date the concern is reported, the repair needed, and when the fix is complete are in the LOG. This LOG is a permanent WFI City College Record.

E. CAMPUS SECURITY AUTHORITY

1. ***Campus Security Authority*** is a Clery-specific term that encompasses four groups of individuals and organizations associated with an institution.

- a. A campus police department or a campus security department of an institution. If the institution has a campus police or security department, those individuals are campus security authorities.

WFI City College does not have campus police or campus security department.

- b. Any individual or individuals who have responsibility for campus security but do not constitute a campus police department or campus security department.

Front desk personnel are control access to the main entrance. Visitors are escorted through the campus by WFI City College personnel.

- c. **Ms. Madeline Sargent is the Designated Senior Security Authority.**

2. Any individual or organization specified in an institution's statement of campus security policy as an individual or organization to which students and employees should report criminal offenses.

- a. **Report criminal offenses to any of the following:**

Madeline Sargent, Campus Director | Senior Designated Security Authority
madeline.sargent@wficitycollege.org

Robert Phillips, Director of Education
robert.phillips@wficitycollege.org

Rose Nelson, Lead Allied Health Instructor
rose.nelson@wficitycollege.org

3. *An official of an institution who has significant responsibility for student and campus activities, including, but not limited to, student housing, student, discipline, and campus activities, and proceedings. An official is as any person who has the authority and duty to act or respond to issues on behalf of the institution.*

- a. **The following individuals at WFICC comprise Security Authority:**

Madeline Sargent, Campus Director | Senior Designated Security Authority
madeline.sargent@wficitycollege.org

Robert Phillips, Director of Education
robert.phillips@wficitycollege.org

Rose Nelson, Lead Allied Health Instructor
rose.nelson@wficitycollege.org

4. WFI City College Security Authority will:

- a. Serve as a point of contact for students and employees regarding emergencies, crime, safety and security issues.
- b. Notify the property manager or building owner whenever a crime is suspected to have occurred on or WFI City College premises or both.
- c. File a report with the local police department whenever there is a theft of company property or a pattern of theft that has traceable identification.
- d. Report homicide, rape, robbery, assault, illegal drugs and weapon possession to the local police department and cooperate with any resulting investigations.
- e. Report to senior management all claims, and complaints made of a Clery Act crime for which he or she becomes aware.
- f. Maintain the WFI City College Crime Log and crime statistics for public reporting.
- g. Not make arrests. If there is an arrest, it is the responsibility of the police.

F. CRIME LOG

1. **What is a Crime Log:** The crime log is a secured permanent detailed record of all crimes reported to the WFI City College.
2. **Responsibility for the Crime Log:** The WFI City College *Senior Security Authority keeps the Crime Log. SEXUAL HARASSMENT*, complaints, if made, are recorded, and investigated according to criteria set by the *Federal Clery Act*. WFI City College Senior Security Authority, Ms. Madeline Sargent oversees the records and the investigations.

Ms. Madeline Sargent
madeline.sargent@wficitycollege.org
4322 N. 5th Street – Philadelphia PA 19140
T 215.455.2300 - F 267.592.4189

The *Senior Security Authority* is also responsible for keeping a permanent record of **non-criminal incidences** that occur on WFI City College premises or off-campus at sanctioned events. The incidences may include but are not limited to fire, smoke, chemical or medical emergencies

3. **The Purpose of The Crime Log:** The Crime Log is a secured document for documenting all reported crimes whether the reported occurrence is on WFI City College premises or at a

sanctioned off-premise activity that is in direct support of or related to the school's educational use. The content of the Crime Log includes the crime date, time, date and time reported and the nature and location of the crime for every reported incident. If known, the disposition of the complaint is also noted.

- a. The Crime Log is an accurate record of reported crimes and is within two business days of the report except where and when:
 - i. prohibited by law or when disclosure would jeopardize the confidentiality of the victim or investigation of the case;
 - ii. the record of the crime could compromise an ongoing criminal investigation or safety of an individual;
 - iii. documenting the occurrence in the Crime Log could cause the suspect(s) to flee, evade detection, or result in the destroying of evidence;
- b. The Crime Log is available for public inspection during regular business hours for the most recent 60 days. Crime log requests for events posted preceding 60 days are made available within two business days.

G. REPORTABLE OFFENSES

In accord with the Clery Act regulations, WFI City College discloses the following three (3) categories of criminal activity if the crime occurs on its premises or during sanctioned off-campus activities. The classifications follow the Federal Bureau of Investigation (FBI) *Uniform Crime Reporting Handbook*. Offenses reported are reflected in WFI City College *Crime Statistics Report* which is public. There were no reported crimes on campus during the eight years of the current federal reporting period. Refer to the *Crime Report* for details.

1. Criminal Offenses:

- a. Criminal homicide including murder and non-negligent manslaughter, and
- b. negligent manslaughter;
- c. Sex offenses including those which are forcible and non-forcible;
- d. Theft, robbery, burglary or motor vehicle theft;
- e. Arson;
- f. Aggravated assault;
- g. Carrying, possessing or selling drugs, liquor or firearms.

2. **Hate Crimes** which include any of the offenses mentioned above, and any incidents of a robbery, theft, simple assault, intimidation, or destruction/damage/vandalism to property motivated by bias.

3. **VAWA offenses** including domestic violence, dating violence, and stalking.

H. CRIME STATISTIC

Crime statistics are a public record under public Law 102-26. The following data provides statistics concerning the occurrences of criminal offenses on WFICC facility

The following *crimes* were reported to WFI City College or the local police as having occurred on campus:

Criminal Offense	2010	2011	2012	2013	2014	2015	2016	2017
Murder	0	0	0	0	0	0	0	0
Forcible Sex Offense	0	0	0	0	0	0	0	0
Non-Forcible Sex Offense	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	1
Motor Vehicle Theft	0	0	0	0	0	0	0	0
Manslaughter	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0

In addition to the above crimes, the following *arrests* were made during the reporting period of 2010 - 2017:

Criminal Offense Resulting in Arrests	2010	2011	2012	2013	2014	2015	2016	2017
Liquor Law Violations	0	0	0	0	0	0	0	0
Drug Abuse Violations	0	0	0	0	0	0	0	0
Weapons Possessions	0	0	0	0	0	0	0	0
Crimes Manifesting Evidence of Prejudice	0	0	0	0	0	0	0	0

I. REPORTING CRIMINAL ACTIVITY | CAMPUS SECURITY INFORMATION

1. **If you see something say something!** In all instances of a suspected crime within the WFI City College community students, faculty, and staff should report the occurrence immediately.
2. Authorized administrative personnel will take a full written account from involved parties and witnesses at all reported emergency or criminal incidents. The statements are in the written report are may be used by local/state law enforcement authorities for criminal apprehension and crime prevention. The school's administrative staff review the Criminal events are reviewed by for disciplinary action.

**The Priority is
Always the Safety
and Protection of
Life!**

WFI City College	
Emergency	9-1-1
Non-Emergency	3-1-1
WFICC Main	215-455-2300
ASPIRA MAIN	215-455-3300
4322 North 5th Street Philadelphia, PA	

3. Should You Be the **VICTIM OF OR WITNESS A CRIME AGAINST PERSON(S) IN PROGRESS** WFI City College requests that you follow this procedure:
 - a. **FIRST DIAL 9-1-1 TO REPORT THE EMERGENCY.**
 - b. Report the activity to any member of the faculty or staff when safe to do so.
4. Should you witness a **CRIME AGAINST A PROPERTY IN PROGRESS DURING BUSINESS HOURS** WFI City College requests that you follow this procedure:
 - a. Report the activity to any member of the faculty or staff immediately.
5. Should you witness a **CRIME AGAINST A PROPERTY IN PROGRESS DURING NON-BUSINESS HOURS** WFI City College requests that you follow this procedure:
 - a. Dial 9-1-1 to report the activity to the Philadelphia Police Department

J. TIMELY CRIME ALERTS TO THE CAMPUS COMMUNITY

1. Unless responsible authorities believe a warning could compromise efforts to assist a victim(s) or to contain, respond to, or otherwise mitigate the emergency, the *Security Authority* warns faculty, students, staff, and visitors of dangerous conditions or emergencies, or both, that present an immediate threat to health or safety.
2. Alerts are issued by email, text messaging when possible, print alerts throughout the WFI City College premises, the WFI City College's websites and social media. Timely reporting to the WFI City College community is also intended to aid in the prevention of similar occurrences.

K MONITORING STUDENT CRIMINAL ACTIVITY OFF CAMPUS

1. WFI City College does not monitor the off-campus criminal activity of its students' actively. If, however, it becomes aware that a student has been charged with or convicted of a crime, the WFI City College *Security Authorities* will cooperate with law enforcement at its request and follow applicable laws during the investigation.
2. If a student is charged with and convicted of off-campus criminal activity that bears directly on the safety and security of WFI City College students' faculty and staff, the College determines the appropriate course of action and reserves the right to act as allowed by its published student conduct policies.

L. FIRE & HAZARDOUS MATERIALS

1. Faculty, staff, and students should report anything in or around the facilities that present the risk for fire. All such reports funnel immediately to Administration and the Senior Security Authority who will notify the Building Facilities Manager of the safety concern.
2. The Campus Senior Security Authority maintains a LOG of all complaints made regarding fire risks in or around the facility. The date of the claim, the safety concern, the Building Facilities Manager notification date, the steps that are taken to remedy the safety issue is in the LOG. This LOG is a permanent WFI City College Record.





Part II:

Policies & Procedures for The Safety & Security of Students, Faculty, Staff & Visitors

**The Priority Is Always
the Safety and
Protection of Life!**

A. WFI CITY COLLEGE CRIME PREVENTION INITIATIVES

1. WFI City College publishes and disseminates this document in its entirety, including safety and crime prevention guidelines for the benefit of faculty, staff, and students. These policies and procedures are available for review by prospective students and the public under the Consumer Information tab at <https://www.wficitycollege.org>.
2. Faculty, staff, and students are required to have and display their school-issued identification badges when on the premise. Contractors and visitors are issued and must temporary identification.
3. The main entrance to WFI City College is fit with buzzer access controlled by Front Desk personnel. Visitors are required to sign in at the Front Desk when visiting the institution. Visitors are issued a name tag to display on their lapel before leaving the area.
4. Visitors and contractors must be escorted by WFI City College employees while on the premises.
5. WFI City College receives and reviews crime alerts received electronically from the Philadelphia Police Department.
6. WFI City College informs faculty, staff, students, and visitors of any instance where personal safety may be at risk, or if criminal activity, or both, occur in, around, or near WFI City College facilities and in or around a sanctioned off-campus event. Depending on the action necessary, alerts are made either in person, by email, by print notice and text message.
7. Cameras are strategically located throughout WFI City College premises to monitor and record activity taking place.
8. Police officers, security officers, and emergency medical personnel are contracted to provide support when the WFI City College Security Authority deems the support necessary.

9. Annual review of policies and practices.
10. Administration, faculty and staff practice sessions.
11. All-Campus drills are required and executed.
12. WFI City College maintains Incident, Compliant and Crime logs and provides required reports to the U.S. Department of Education and makes these reports available to the public.

B. EMERGENCY ACTION PLAN (EAP) THE RESPONSE, NOTIFICATIONS, AND TESTING POLICY

1. An **Emergency Action Plan (EAP)** covers designated actions faculty, staff, and students take to ensure safety during emergencies. The EAP is a supplement to the comprehensive to ASPIRA building plan. ASPIRA is the owner and primary occupant of the building WFI City College occupies. Not all critical incidents are predictable. The EPA, therefore, must be regarded a guideline with that fact in mind. The emphasis in the EPA is on establishing a minimum emergency preparedness plan and procedures for training for all WFICC personnel and preparing students by providing written guidelines and drills to mitigate risk to the WFI City College community in the event of an emergency.
 - a. The plan is reviewed and updated by WFI City College administrators and the WFI Senior Designated Security Authority annually and more frequently.
 - b. The plan includes WFI City College staff and students in collaboration with other building occupants to provide an efficient Emergency Preparedness.
 - c. To foster active responses, WFI City College conducts unannounced fire and active shooter drills for evacuating the building, lock-down hide, and shelter-in-place emergency responses.
2. **Notification of Emergencies:** Faculty, students, staff, and visitors are notified of emergencies by the sounding of a fire alarm or by a verbal warning.
 - a. WFI City College uses the *City of Philadelphia Paramedics and Fire Department* for fire, medical response, and rescue.

C. GENERAL EMERGENCY INSTRUCTIONS AND CALLING 9-1-1

1. **Get out of immediate danger and stay calm.** In the event of a fire, or if you feel you, the building's occupants, or both, are in danger:
 - a. Activate the building's fire alarm system **BEFORE** calling 9-1-1.
 - b. Evacuate the building immediately!

3. **Report any police, fire, or medical emergency, call 9-1-1** from any phone or activate the fire alarm by pulling the fire alarm device from any location in the building. Pulling the signal will summon emergency responders immediately and automatically. WFI City College fire alarm system is tied directly to the nearest fire department.

4. **What to say and do WHEN CALLING 9-1-1:**
 - a. Provide the address of the building involved:

**WFI City College | ASPIRA of PA Building:
4322 North 5th Street - Philadelphia, PA 19140**

 - b. Tell the 9-1-1 Operator about the emergency, i.e., fire, active shooter. Provide enough information for authorities to dispatch the proper resources.

 - c. When describing an individual, provide as much detail as you can, starting from a description of the head and progressing down to feet. Include hair, eye, and skin color, approximate height, and weight, identifying marks including scars, tattoos, piercings, hats, clothing, and shoes.

 - d. Give your name, exact location, phone number, and any other information asked of you by the 9-1-1 Operator.

 - e. Do not hang up until the dispatcher tells you to do so.

D. BUILDING EVACUATION PLAN

1. WFI City College has an Emergency Action Plan (EAP) with procedures to follow in the event of a crisis. The EAP details how WFICC notifies faculty, students, staff, and visitors of an emergency and to the best of its abilities and resources directs actions for safety and security.

2. **WFIC City College activates the EPA | EVACUATION PROTOCOL** when a condition makes it unsafe to remain in a building. The *Evacuation Protocol* provides for the orderly movement of

students, faculty, and staff along the prescribed routes from inside the building to a pre-planned designated area safely outside of the building.

a. **Evacuation** is appropriate for, but is not limited to, the following types of emergencies:

- Fire
- Flood, Explosion or Threat of Explosion
- Bomb Threat
- Chemical Accident
- Active Shooter (given specific conditions)

3. **Campus security authority will:**

- a. Instruct students, faculty, staff, and visitors to leave the building in an orderly manner using the designated evacuation routes and reassemble in the assigned assembly area.
- b. *Determine* that students, staff, and faculty are all accounted for when everyone reassembles in a safe location and will alert emergency authorities if anyone is not.
- c. Remain with the WFI City College community in the assembly area until given an all-clear from the emergency response authority.
- d. Will notify the WFI City College community when it is safe to return to the building and resume normal activities.

4. **What to do when told to evacuate:** Stop all activities and leave immediately. Taking all your critical personal belongings such as your keys, purse, wallet, and coats. Do not go back to for any reason. If possible, close and lock the doors. Evacuate according to the evacuation plan for your location by proceeding to the nearest exit. Once out of the building move to your designated assembly area.

- a. Remain calm and treat all evacuations as if they are real.
- b. Listen to and follow instructions from emergency personnel.
- c. Do not re-enter the building for any reason until you have the “all clear” signal from the fire department and a WFI City College *Senior Security Authority*.
- d. Ensure accurate accounting for all faculty, students, staff, and visitors.
- e. In the event of a fire, call 9-1-1 or the pull the fire alarm.
- f. When it is safe to do so, **first** call 91, and **then** report the incident to Security Authority.

5. **Evacuation routes:** All students, faculty, and staff must know all emergency evacuation routes available to them because one or more evacuation routes be inaccessible. During an emergency evacuate using the nearest door or stairway open to you.

- a. **Building Evacuation Maps** are included at the end of this document and posted in several locations on all floors in the building. For your safety, please know all evacuation routes possible, so you take the way closest to you and identify alternative routes if the nearest approach is unusable. **No matter the circumstance, DO NOT USE ELEVATORS**

during an evacuation. Faculty and staff direct occupants in their area (classroom/floor) to evacuate and lead them to evacuation routes.

b.

6. **Know where to go you exit the building upon evacuate:** Upon exiting the building all faculty, staff, students, and visitors MUST use the evacuation route TO GO IMMEDIATELY TO THE PRE-ARRANGED ASSEMBLY AREA. The ASSEMBLY AREA is where a complete accounting to verify that no one is left behind and in danger.
 - a. The assembly area is set based on ease of access, keeping a safe distance from the WFI City College building and out of the way from emergency response personnel and equipment. If unsafe for the current emergency, designate an alternative assembly area.
 - a. **Go directly to the assembly area.** Upon exiting WFI City College premise or the premise of an off-premise WFICC sanctioned event, it is critical to go directly to the planned ASSEMBLY AREA AND STAY THERE UNTIL receiving instructions otherwise from a WFICC Authority.
 - c. The **designated PRIMARY ASSEMBLY AREA** for WFICC Assembly is at least 300 feet from building and is located **directly across from the main entrance to WFICC | ASPIRA of PA on the East side of North 5th Street.**
 - d. If in the WFICC authority's judgment the primary assembly area is comprised he or she will lead all present to the **designated SECONDARY ASSEMBLY AREA.** That secondary location is:
Reihs Flower Shop 4403 North 5th Street, Phil PA 19140 corner of 5th & Cayuga Streets Walk north on 5th toward Purdy Street
 - e. If you are attending a WFICC sanctioned off-premise event, the event leader will discuss and show the group an EVALUATION PLAN and ASSEMBLY AREA for the activity upon arrival.

7. **Assisting Visually Impaired Individuals During an Evacuation**

Assist the Individuals by:

- a. Announce the type of emergency.
- b. Offer your arm.
- c. Tell the person where you are going and steer away from obstacles.
- d. When you reach safety, ask if further help is needed.

8. ASSISTING HEARING IMPAIRED INDIVIDUALS DURING an EVACUATION

Assist the Individuals by

- a. Turn lights on/off to gain a person's attention
- b. Indicate directions with gestures
- c. Write a note with evacuation directions

9. ASSISTING INDIVIDUALS USING CRUTCHES, CANES OR WALKERS DURING an EVACUATION

Assist the Individuals by

- a. Assist and accompany to evacuation site, if possible.
- a. Use a sturdy chair (or one with wheels) to move the individual.
- b. Help carry individual to safety.

10. ASSISTING NON-AMBULATORY OR WHEELCHAIR USING INDIVIDUALS DURING AN

EVACUATION: The needs and preferences of non-ambulatory individuals vary. Those at lower level locations may be able to exit without help. Others may have minimal ability to move and lifting them may be dangerous. Non-ambulatory individuals also may have respiratory complications. You must; therefore, you remove them from smoke and vapors immediately.

Assist these Individuals by:

- a. Prioritize assistance for wheelchair users with electrical respirators.
- b. Next, prioritize all other non-ambulatory & wheelchair users.
- c. Consult with the person about how and where best to pick them up and move them. Moving non-ambulatory persons may require 2 or more able people.
- b. Most wheelchairs are too heavy to carry down the stairs alone.
- c. Reunite person with the wheelchair as soon as possible as it is safe to do so.



E. IMMEDIATE RESPONSE TO ACTIVE SHOOTER

An active shooter is an individual or individuals engaged actively in killing or attempting to kill people in a confined and populated area; in most cases, active shooters use firearms(s), and there is no pattern or method to their selection of victims. All active shooter situations are unpredictable and evolve quickly. Immediate 9-1-1 emergency calls to law enforcement are critical because law enforcement officers are required to stop the shooting and mitigate harm to victims.

Active shooter situations are often over within 10 to 15 minutes from their start therefore even with immediate 9-1-1 calls individuals must be as prepared as possible, both mentally and physically, to deal with an active shooter situation before law enforcement arrives.

ALWAYS

- ⇒ Be aware of your surroundings and the people in it.
- ⇒ Be alert to signs that you may be in danger.
- ⇒ Take note of the two nearest exits in any facility you visit
- ⇒ At the first sign of an active shooter call 9-1-1 as soon as it's safe to do so!

RESPONSES

- ⇒ You Have **three (3) Primary Options**: quickly determine the most reasonable way to protect your life; **EVACUATE, HIDE, ACT AGAINST THE SHOOTER.**
- ⇒ Follow the lead of instructor(s), and WFICC staff, and administrators, if possible.

IF YOU ARE CALLING THE 9-1-1 OPERATOR REPORT

- Location of the active shooter
- Number of shooters
- Physical description of shooter(s)
- Number and type of weapons held by the shooter(s)
- Number of potential victims at the location

1. **EVACUATE:** If there is an accessible escape path, attempt to vacate the premises.

Be sure to:

- a. Have an escape route and plan in mind.
- b. Evacuate regardless of whether others agree to follow.
- c. Leave your belongings behind.
- d. Help others escape, if possible.
- e. Prevent individuals from entering an area where the active shooter may be.
- f. Keep your hands visible.
- g. Follow the instructions of any police officers.
- h. Do not attempt to move wounded people.
- i. Call 911 when you are safe.

2. **HIDEOUT:** If evacuation is not possible, find a place to hide where the active shooter is less likely to see you. If you are in an office or classroom, stay there, and secure the door. Do your best to prevent an active shooter from entering your hiding place by locking the door, barricading or blocking the doorway with heavy furniture. If cannot evacuate and you are in a hallway, get into a room and secure the door.

Your Hiding Place Should:

- a. Be out of the active shooter's view
- b. Closed and locked if at all possible.
- c. Add more protection by hiding in a closet, behind a thick wall or large metal objects, such as cabinets or desks. If you are in an office closed and the door.
- d. Do not trap yourself or restrict your options for movement.

If the Active Shooter Is Nearby:

- a. Dial 9-1-1, if possible, to alert police to the active shooter's location and your location.
- b. If you cannot speak, leave the line open and allow the dispatcher to listen.
- c. Silence your cell phone and pager.
- d. Turn off any source of sound that may that may draw the attention of the active shooter to you such as radios, iPads, computers, and televisions.
- e. Remain still and quiet.

3. **WHEN YOU CANNOT EVACUATION OR HIDE | ACT AGAINST THE SHOOTER**

When a shooter is at close range, and you cannot hide or flee, your chance of survival is much higher if you act against the shooter(s). Moving against the shooter is the last resort. Act against the shooter only when your life is in imminent danger, and there is no other option. Do not attempt to talk the shooter down or negotiate for your life. If you are facing an active shooter in close range attempt to take the shooter down and in all ways, disrupt, disarm and disable him, her or them.

- a. Yell and act as aggressively as possible against him, her or them.
- b. Throw heavy or sharp items at the shooter with as much force as pos and use weapons with the intent to cause physical harm, dislodge the gun (s) or both.
- c. Commit to your actions.

F. LAW ENFORCEMENT RESPONSE TO ACTIVE SHOOTER

1. Law Enforcement's Initial Purpose is to Stop the Active Shooter as Quickly as Possible
 - a. Officers usually arrive in teams of four (4);
 - b. Officers may wear regular patrol uniforms or external bulletproof vests, Kevlar helmets, and other tactical equipment;
 - c. Officers have rifles, shotguns, handguns;
 - d. Officers may use pepper spray or tear gas to control the situation;
 - e. Officers may shout commands, and may push individuals to the ground for their safety;
 - f. Officers will proceed directly to the area from where shots came.
2. The first officers to arrive on the scene will not stop to help injured persons. Expect rescue teams including emergency medical personnel and additional officers to come after the initial officers. The rescue team will treat and remove any wounded persons. They may also call upon non-disabled individuals to assist in removing the injured from the premises.
3. Once you have reached a safe location or an assembly point, you will likely be held in that area by law enforcement until the situation is under control, and all witnesses have been identified and questioned. Do not leave until law enforcement authorities have instructed you to do so.

H. WHAT TO DO WHEN LAW ENFORCEMENT ARRIVES

1. Follow directions provided by the officer(s);
2. Put down any items in your hands including pocketbooks, bags jackets;
3. Raise hands above your head, palms facing forward, and fingers spread,
4. Always keep your hands visible;
5. Do not make any quick movement toward officer(s);
6. Do not attempt to grab onto, hold or touch the officer(s);
7. Do not point, scream or yell;
8. Do not to ask officers for help or direction when evacuating;
9. If not given specific direction, then proceed in the direction from which officers are entering the premises;
10. Provide relevant information to the officer(s)
 - a. Location of the active shooter
 - b. Number of shooters, if more than one
 - c. Physical description of shooter/s
 - d. Number and type of weapons held by the shooter/s
 - e. The number of potential victims at the location.

I. LOCKDOWN

1. Lockdown goes into effect for threats posed from inside the building, outside the building or both. The threat can be from active shooter other violence threatening individual(s) or terrorist activity imposing on the security and safety of WFI City College students, faculty, staff and visitors. The perpetrator(s) may be attempting to enter WFI City College, nearby criminal or terrorist activity or already inside the building. Wherever you are when the lockdown no one is allowed in or out. You will not be allowed to leave the area until there is an all-clear.
2. **WFICC Faculty, Staff & Administration Lockdown Procedures:**
 - a. Direct the students to a position out of the line-of-sight of doors and windows.
 - b. Check outside of the classroom for nearby students and move them into the classrooms.
 - c. Close and lock all doors and windows.
 - d. Cover door window and close window blinds.
 - e. Turn off the lights and remain quiet.
 - f. Take attendance, and report by cell or classroom phone, to the Campus Director or Security Designee. Report missing or additional students.
3. **Students:**
 - a. If you are in a common area, you should proceed immediately to the nearest classroom or other pre-designated safe room.
 - b. If you are outside of the building, move away from it and go to the designated evacuation site or another appropriate, safe location. If possible, when you are in a secure location call or text the Campus Director, Security Authority or your Instructor.

J. SHELTER-IN-PLACE

1. Shelter-in-place is appropriate for threats posed by atmospheric contamination. The risks are the result of accidents or attacks involving chemical, biological or radiological hazards.
2. **WFICC Faculty, Staff & Administration Shelter-in-Place Procedures:**
 - a. Close and lock all exterior windows and doors immediately.
 - b. Turn off all heating, ventilation, and air conditioning (HVAC) systems.
 - c. Move all students and staff to designated interior safe rooms.
 - d. Designated Security Authorities must bring the WFI City College grab-and-go bag, Automatic External Defibrillators (AEDs), and other equipment to the shelter-in-place location(s).
 - e. Each instructor must take attendance before leaving the classroom and upon settling into the designated interior safe room and report to Security Designee. Report missing or additional students.

K. CRIME PREVENTION AND SAFETY GUIDELINES

Safety in the Office and Classroom

1. Avoid working or studying in secluded areas.
2. Let someone know where you are and when you expect to return.
3. When hanging your coat, remove your valuables and keep them on you.
4. Do not “hide” your purse under your desk or in an unlocked drawer or unlocked locker.
5. Keep files and desk drawers locked when away.
6. Never leave valuables unattended.

Safety on the Street

1. If possible, avoid walking or jogging alone. Vary your routes. Create a walking buddy relationship with a classmate.
2. Walk with confidence. The more confident you look, the stronger you appear.
3. Be alert to people passing by and to your surroundings.
4. Use a purse or pocketbook that allows to cross your body with the strap and then hold your bag under your arm.
5. If possible, at night, walk on well-lit and traveled streets.
5. Let someone know where you leave, where you are and when you expect to arrive/return.
6. Avoid alleyways and deserted parking lots.
7. Avoid expose or wearing flashy expensive jewelry.
8. Be cautious of strangers approaching you from behind. Be assertive. Don't let anyone violate your space. Turn around, face them, let them pass and walk ahead of you.
9. Be cautious of strangers approaching you and asking for time, money, a cigarette or for directions.
10. Do not stop if a car pulls up alongside you.
11. Use common sense, don't jaywalk. Use pedestrian walk lights and crosswalks.
12. Wear shoes that allow you to move quickly or run.
13. Know your route and know the possible safety go-to places on that route.
14. Keep your cell phone within reach if the event you need police assistance.
15. Never hitchhike or pick up a hitchhiker.
16. Always trust your instincts. If you feel uncomfortable in your surroundings, take action to leave the area.

Safety on Public Transportation

1. When possible, travel with a companion.
2. If you're the only passenger on a bus, sit as close to the operator as possible.
3. At night, be particularly careful of oncoming traffic when getting off a bus.
4. Stay back on subway platforms and allow the train to stop before approaching.

Safety on Bicycles

1. Maintain your bicycle is in excellent mechanical condition.
2. Always wear a bicycle helmet to prevent head injury.
3. Obey the same traffic laws that apply to motor vehicles.
4. Give the right-of-way to pedestrians.
5. Ride on the right with the flow of traffic.
6. Use front, rear, side, and pedal reflectors and lights.
7. Use hand signals for turns.
8. Secure your bicycle with locks.

Annoying Telephone Callers

1. Do not give your name, address, or other personal information.
2. If the caller asks for your name, ask for the number that he/she is calling. Do not confirm whether the number reached is correct or not.
3. If the caller doesn't respond to your questions, hang up.
4. In the event of an obscene call:
 - a. Do not give the caller the satisfaction of a response, hang up.
 - b. Note the date, time and duration of the call, and describe the caller's voice and anything distinctive.
 - c. Do not identify yourself by name on answering machines or voice mail.
 - d. Contact the police if caller persists.

Theft Prevention

1. Never leave your pocketbook or backpack unattended even if only for a minute.
2. If you must leave your property behind, ask a trusted friend to oversee it for you.
3. Door – to door soliciting can be a ruse for theft. Solicitation is not allowed in residential areas. Report soliciting to the police.
5. When approaching an Automated Teller Machine (ATM), be alert for anyone lingering in the area. If you feel uneasy or you suspect a problem, do not use the machine; leave the area immediately. Report suspicious activity to the local police and the bank's security department. Go to anyone ATM or come back at another time.
6. Distance yourself from other ATM customers so that you can conduct your transaction privately.
7. Never give any information about your ATM account or your PIN to anyone.
8. Do not loan your ATM or credit card(s) to friends.
9. Do not write your PIN on your ATM card.
10. If your card is lost or stolen, report it immediately.





Part III DISCRIMINATION, HARRASSMENT, AND ASSAULT POLICY & PROCEDURE

A. DEFINITIONS

1. **Assault:** the commission of an act with the intent to cause fear in another of immediate bodily harm or death, or the intentional infliction or attempt to inflict bodily harm upon another.
2. **Sexual Assault:** forced sexual activity without the expressed consent of both parties, or against a person incapable of giving consent, and includes but is not limited to the threat of sexual assault, sexual battery, forced oral copulation, forced sodomy, rape, acquaintance rape, and rape by a foreign object. Domestic violence, dating, violence, and stalking also constitute sexual assault.
3. **Community:** WFI City College students, faculty, staff, administrators and visitors.
4. **Consent** is a voluntary, explicit agreement between the participants to engage in the specific sexual activity. For example, a person may give consent to kiss but not intercourse.
5. **Consensual relationship:** a voluntary romantic or sexual relationship between a student and a one who is in a position of authority over the student.
6. **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. The existence of such a relationship is determined based on the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.
7. **Acquaintance Rape** is a rape committed by someone known to the victim. The perpetrator might be a friend, classmate, co-worker, instructor, relative, or casual acquaintance such as a clerk in a store. It is important to remember that acquaintance rape is not a separately defined crime.

8. **Discrimination** is the segregation, separation, or disparate treatment of individuals based on gender, age, race, creed, national origin, religion, disability, sexual orientation, marital status, or status related to public assistance. Discriminatory practices include any instances of treatment or behavior that interfere with an individual's full participation in the school community such as discouraging course participation or other activities designed to inhibit progress in a program of study.
9. **Domestic Violence** is any felony or misdemeanor crime(s) of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under domestic or family violence laws, or by any other person against an adult or youth victim who is protected from that person's acts under domestic or family violence laws.
10. **Harassment:** any unwanted behavior that results in a hostile environment.
11. **Prohibited Conduct** includes dating violence, domestic violence, discrimination, harassment, sexual harassment, stalking and retaliation, as defined in this policy, provided that conduct either a) occurs at WFI City College facilities;
 - b. Happens at or in connection with a course or other institutional event;
 - c. Is alleged to have created a hostile environment at the school or institutional activity.
12. **Respondent:** the person alleged to have engaged in prohibited conduct.
13. **Retaliation:** any adverse action that is taken in retribution for one's reporting, supporting, or participating, in an investigation related to an allegation of prohibited conduct, where the claimant makes the complaint in good faith.
14. **Sanction:** A sanction is a disciplinary action that may result from prohibited conduct.
15. **Sexual Harassment:** unwelcome sexual advances, sexual assault, request for sexual favors, and other verbal or physical conduct of a sexual nature, including but not limited to the following:
 - a. Behavior that interferes with student academic performance, or creates an intimidating, hostile, or offensive educational environment.
 - b. Unwelcome, unnecessary, or coerced touching, kissing, grabbing, hugging, cornering, or other physical contact that is of a sexual nature or sexually motivated.
 - c. Unwanted sexual compliments or comments.
 - d. Demand for sexual favors accompanied by implied or overt threats concerning employment, grades, compensation, tangible benefits, or recommendations.
 - e. Unequal academic or employment performance standards, discipline, or work regulations because of sex.
 - f. Deliberate or careless use of effective or demeaning language that has a sexual connotation.

- g. Deliberate or careless dissemination of materials such as cartoons, articles, pictures, or graffiti that have sexual content, which are not necessary for the academic environment, and which are offensive to students or employees.
16. **Stalking:** conduct directed at a specific person that would cause a reasonable person to fear for his or her safety or the safety of others or suffer substantial emotional distress.
 17. **Summary Suspension:** an immediate temporary suspension of a student during an evaluation of a complaint about prohibited conduct. During Summary Suspension the student is barred from engaging in all activities associated with the institution.
 18. **Suspension:** an institution-initiated temporary status which denies a student access to the classroom until he or she meets the required conditions.
 19. **Institutional Administrator:** An institutional administrator is an employee who holds a position of responsibility at a supervisory or managerial level or higher.
 20. **Institutional Statutory Designee:** the person or persons designated under Title IX of the Education Amendment of 1972, Section 504 of the Rehabilitation Act, and Age Discrimination Act as the employee(s) responsible for coordinating WFICC efforts to comply with the statutes.

B. WHAT IS SEXUAL ASSAULT

1. The crime of rape occurs when the offender “has sexual intercourse or unnatural sexual intercourse with a person and compels such person to submit by force and against her or his will or compels such person to submit by threat of bodily injury.”
2. Rape and attempted rape are felonies with incarceration periods that vary by the state, the extent and severity of bodily injury caused by the abuse, conditions including group attack and or if the violation occurs during the commission of additional crimes, such as a burglary.
3. The crime of indecent assault and battery occurs when the offender, without the victim’s consent, intentionally has physical contact of a sexual nature with the victim. This contact may include an offender touching a woman’s breasts or buttock, or the pubic area of a man or woman. Indecent assault and battery are felonies.

C. FACTS ABOUT SEXUAL ASSAULT

1. Acquaintance rape is rape. It is a felony. Those convicted are imprisoned.
2. As a rule, women are more likely to be raped by someone they know than by a stranger.

3. Persons between the ages of fifteen and twenty-five are the most vulnerable to date or acquaintance rape.
4. The use of alcohol or drugs, by both the victim and the offender, is often a contributing factor in sexual assault cases.
5. Men can be victims of sexual assault.

D. HARASSMENT, DISCRIMINATION AND SEXUAL ASSAULT POLICIES

WFI City College is committed to providing all students with an environment free of discrimination, harassment, and assault. This policy establishes the definitions, procedures, prohibited conduct, and sanctions implemented to maintain the desired learning and working condition.

1. It is the responsibility of the WFI City College administration to provide a safe environment for students and employees and to prevent crime. Therefore, the following policy is for the protection of students, faculty, and staff. This policy follows the Student Right-to-Know and Campus Security Act of (P.L. 101-542).
2. WFI City College is an equal opportunity educational institution. The College admits students without regard to age, race, color, religion, gender, sexual orientation, disability or national origin and does not discriminate on the basis age, race, color, religion, gender, sexual orientation, disability or national origin in administration of its admission, educational, student services policies, loan programs, and other school-administered activities. The facility provides individuals with disabilities accommodation with street-level entry, doorways, and corridors of adequate width for wheelchairs in addition to an inside elevator for transport between floors. Anyone with questions concerning protection against discrimination should direct to them to WFI City College Title IX Coordinator: Ms. Madeline Sargent 4322 North 5th Street Philadelphia, Pennsylvania 19140 (215) 455-2300.
3. WFI City College will be open during posted hours. In the event a crime is committed during these hours, report the incident to the Campus Director or a Security Authority.
4. The enforcement authority of the Campus Authority is limited to the enforcement of WFI City college rules and regulations. Incidents that go beyond the scope of campus security personnel are referred to and investigated by the Police Department.
5. Authorized administrative personnel will take a full statement from the victim, involved parties and witnesses to a criminal incident on a Campus Security Incident Report To ensure an accurate and prompt reporting of a crime. The written accounts are part of a written report. The content is in the Annual Crime Statistics | Report a permanent WFI City College record. Campus personnel and the Police Department, for criminal apprehension, investigation and crime

prevention may use these written statements. WFI City College Administration refers to the Incident in making disciplinary decisions.

6. Any student, faculty, or staff member involved **in any of the crimes defined** in the **Annual Safety and Security Report including domestic violence, dating violence, sexual assault, and stalking** will be subject to disciplinary action. Such violations of public law and the Institute's policy could result in suspension or termination. WFI City College reports the incident to the police if there appears to be a violation of municipal, state or federal laws.
7. WFI City College does not tolerate, condone or allow discrimination, sexual and other unlawful harassment ("HARASSMENT"), assault in any form, or any retaliatory behavior related to reports of such conduct whether engaged in by faculty or students, fellow employees, supervisory level employees or non-employees who conduct business with the Institute. Acts of violence, harassment, and any conduct which threatens to endanger the health or safety of any person at WFI City College is prohibited.
8. WFI City College encourages timely reporting of all incidents of all actions stated above. If anyone knows about HARASSMENT or any related behaviors, he/she should report the acts directly to the Campus Director or the Campus Senior Security Authority who will investigate faculty, staff, and student complaints. WFI City College will not permit retaliation against an employee or student who reports an incident of HARASSMENT, or for assisting in a complaint investigation.
9. The WFI City College reserves the right to apply sanctions on a case-by-case basis. WFICC Human Resources Policies determine internal disciplinary action against a WFI City College employee concerning alleged prohibited conduct committed against students.
10. An individual found to have engaged in misconduct will be disciplined, up to and including, employment termination or immediate dismissal from the Institute.

WFI CITY COLLEGE EXPRESSLY PROHIBITS THE OFFENSES OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT AND STALKING AS DEFINED BELOW:

1. **Domestic Violence** is any felony or misdemeanor crime of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under domestic or family violence laws, or by any other person against an adult or youth victim who is protected from that person's acts under domestic or family violence laws.
2. **Dating Violence** is violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship is determined

based on the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.

3. **Sexual Assault** is forced sexual activity without the expressed consent of both parties, or against a person incapable of giving consent and includes but is not limited to the threat of sexual assault, sexual battery, forced oral copulation, forced sodomy, rape, acquaintance rape, and rape by a foreign object. Domestic violence, dating violence, and stalking also constitute sexual assault.
4. **Stalking:** is engaging in the course of conduct directed at a specific person that would cause a reasonable person to fear for his or her safety or the safety of others or who suffer substantial emotional distress.

E. REPORTING SUSPECTED PROHIBITED CONDUCT TO WFI CITY COLLEGE

1. Anyone can report an instance of alleged prohibited conduct to:
 - Any faculty member
 - Any WFI City College official or administrator
 - Statutory Designees
 - The Campus Director; Any Department Director
 - WFI City College Senior Security Authority

Ms. Madeline Sargent
madeline.sargent@wficitycollege.org
4322 North 5th Street
Philadelphia, PA 19140
(215) 455-2300

2. When a faculty member, official, administrator, or legal designee is made aware of a grievance, he or she will notify the Security Authority immediately.
3. The Security Authority will document the report of prohibited conduct under this policy and will maintain the security of such documentation within the student and institutional files.
4. The complainant (victim) in an instance of prohibited conduct must provide the following:
 - Identify the individual(s) who allegedly perpetrated the prohibited conduct.
 - A description of the alleged prohibited conduct, including the date(s), time(s), and place(s).
 - A statement regarding the corrective action the student is seeking

F. COMPLAINANT RIGHTS

1. In the event of a factual dispute at any stage of these procedures, and which follows the report of alleged prohibited conduct, the burden is on the alleged victim to establish that his or her version of the events in question is more likely accurate and authentic.
2. If at any stage of these procedures the victim requests that the complaint is set aside, that request is honored. If at any stage of these procedures the victim requests anonymity, good faith efforts will be undertaken to act consistently with that request. However, WFI City College informs the student that the ability to maintain anonymity while pursuing a claim under this policy is limited.
3. The victim maintains the right to notify law enforcement, including local police, at any time or to refrain from contacting such authorities. The victim also has the right to seek an order of protection, no-contact order, restraining order, or similar lawful order from any court with jurisdiction. Upon request from the victim, WFI City College will assist him/her in notifying law enforcement authorities. WFI City College retains the right to inform law enforcement, at its discretion, to protect its students and employees.

F. INVESTIGATION

1. Any complaint of prohibited conduct under this policy is investigated by an independent review panel if the complainant is a student and if, by WFI City College Human Resources Department definition, the respondent is an employee or contractor. Allegations will receive a prompt, fair, and impartial investigation and resolution. The process is led by school officials who receive annual training under this policy, which includes but not limited to training in issues related to domestic violence, dating violence, sexual assault, and stalking, and how to investigate and conduct a hearing that protects the safety of the victims and promotes accountability.
2. Investigations of alleged prohibited conduct will include:
 - a. Notification to the respondent of the allegation of prohibited conduct.
 - b. An opportunity for both the alleged victim and the respondent to submit any written, information, evidence, and witness supporting or refuting the allegation.
 - c. An opportunity for both the alleged victim and the respondent to be heard via teleconference.

- d. Both the complainant and the respondent will be entitled to have the same opportunities to have others present on the teleconference, including the chance to be accompanied on the call by an advisor of their choice.
- e. Following the investigation, the independent review panel, and WFI City College's Human Resources will consider the complainant and respondent's submissions, any teleconference statements, and other evidence found during the investigation.
- f. The independent review panel and WFI City College's Human Resources will determine whether conduct has occurred and will issue a decision, including sanctions, if any, no later than 60 days after receipt of the matter from Security Authority, unless the alleged victim requests extension, or circumstances beyond WFICC control require an extension.
- g. If an investigation concludes in a finding of prohibited conduct, the independent review panel together with WFI City College Human Resources will determine steps to take to remedy the effects of any harassment, discrimination, assault, or retaliation and to prevent recurrence.
- h. Such remedy may include, at the sole discretion of the independent review panel and WFI City College's Human Resources, an offer of counseling or other appropriate services to any person found to be harassment, discrimination, assault, or retaliation.
- i. Security Authority facilitates communication between the independent review panel or WFI City College's Human Resources and the parties. Once a determination is reached, the Security Authority will report the decision and any appeal opportunities to the alleged victim and the respondent in writing, simultaneously.
- j. The alleged victim and the respondent have the right to appeal the decision.
See Part III; Section J Appeal Process.

G. INITIAL RESOLUTION PROCESS

1. Security Authority shall administer the Initial Resolution Process. Security Authority consults with Human Resources when a faculty member or employee is involved.
2. Upon receipt of an allegation, Security Authority will determine whether the complaint as stated constitutes prohibited conduct under this policy. In the event the Security Authority concludes that the claim does not contain prohibited conduct under this policy, there will be no further proceedings under this policy.

3. Security Authority may attempt to informally bring the matter to resolution, except in allegations involving alleged sexual assault, dating violence, domestic violence, or stalking. However, the alleged victim always retains the right to refuse informal resolution.
4. The claim goes to an independent review panel or Human Resources for investigation and review if an informal resolution isn't reached.

H. SUMMARY SUSPENSION

1. If the respondent is a student and the alleged prohibited conduct is deemed to be egregious or perceived to create a hostile environment for any student, faculty, staff, employee or contractor, the respondent may be suspended immediately following the guidelines of a Summary Suspension. The institutional administrator directly associated with the course, activity, or event in which the prohibited conduct occurs will have the discretion to determine, consistent with this section when the Summary Suspension is appropriate.
2. If a Summary Suspension is put into effect, the respondent receives notification promptly of his or her summary suspension. The respondent is informed of the right and opportunity to be heard by submitting a written response and appearing by telephone within seven calendar days from the date said notification.
3. The institutional administrator directly associated with the activity or event will complete all procedures required within ten(10) calendar days of Summary Suspension notification.
4. The respondent may submit a written request for an extension of time for his or her written response or appearance by telephone beyond the seven-calendar day deadline. Such extensions shall be automatically granted up to a maximum of 30 calendar days. However, in the event the respondent should exercise the right to an extension, the deadline for the institution official's decision under will be extended by extra time granted the student with the summary suspension in effect through the extension

I. INVESTIGATION OUTCOMES

1. If the institutional administrator finds that the summary suspension was justified, the process continues as described policy, with the suspension remaining in place unless and until reversed on appeal.
2. If the institutional administrator finds that the evidence reviewed does not justify the summary suspension, or if no decision is issued by the institutional administrator within the time constraints as described in section IV.C and IV.D, the summary suspension will expire. The process will continue as defined by policy, but the respondent will return to the status before the summary suspension.

3. In this instance, the respondent will have an opportunity to complete the missed coursework within ten(10) calendar days of returning to the classroom without penalty.
4. If the respondent was in the last two weeks of the course, he or she has the option of receiving an Incomplete (“I”) grade; in that case, the coursework must be completed and submitted no later than two weeks after the course ends; or
5. The respondent may choose to withdraw from the course and retake the course without financial penalty or any penalty for reusing work previously submitted to fulfill assignments for that specific course.

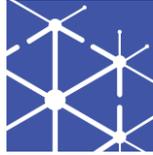
J. APPEAL PROCESS

1. If either party chooses to appeal the initial decision, he or she must submit a formal, written appeal request to Senior Security Authority. The appeal request should be provided by mail or email and within ten (10) calendar days of being sent notification of the panel’s decision.
1. The Campus Director or Campus Director’s designee will receive and review the record developed at the investigation and review stage. Also, at his or her sole discretion, the Executive Director or Executive Director’s designee may accept or reject any evidence not presented at the investigation and review stage of the appeal process.
2. Following the review, the Campus Director or Campus Director’s designee will issue a decision and report it to the alleged victim and the respondent as soon as practicable. Decisions are published no later than 60 calendar days after receipt of the appeal unless the alleged victim requests extension or circumstances beyond the institutional control. The Executive Director or Executive Director’s designee may affirm or reverse the panel’s decision, in whole or in part, or may issue a new decision.
3. The decision of the Campus Director or Campus Director’s designee is final and is provided writing to the alleged victim and respondent simultaneously.
4. A record of the final decision and all related materials will become part of the respondent’s official academic record and upon request, will be made available to all WFICC boards and any appropriate regulatory bodies when needed.

K. REPORTING A PROHIBITED CONSENSUAL RELATIONSHIP

1. Report cases of a consensual relationship involving an employee to Human Resources.

2. If WFI City College determines a prohibited consensual relationship exists, the employee's position of authority concerning the specific student at issue will be adjusted to eliminate the existence of the banned consensual relationship. Resolution of any discrimination, harassment, or assault resulting from the consensual connection is according to policy.





Part IV

SEXUAL ASSAULT AWARENESS AND PREVENTION

Sexual assault and violence are grave issues facing our society. Rape and sexual assault are never the victim's fault-----no matter when, where, why or how it happens! Colleges, universities and post-secondary career institutions across the country are required to develop programs and materials to educate students and staff on sexual prevention and awareness. To the best of its abilities and resources, WFI City College is committed to increasing awareness and providing resources to support prevention and safety for its students, faculty, and staff.

A. WHAT TO DO IF YOU ARE SEXUALLY ASSAULTED?

1. **Get to a safe place as fast as you can.** Then call 911 or the police. For your protection, make the call to the police immediately. If the assault occurs on the WFI City College premises, go to the nearest member of the faculty or staff. This person will provide support and have either the Campus Director or Senior Security Officer or both come to your aid immediately. WFI City College will contact the local police authorities. And officer(s) will be dispatched to the campus to take your report of the incident. Both WFI City College and the police department will encourage you to seek medical attention immediately. It is ultimately your decision to pursue an assault complaint at some later point.
2. **Do not touch or change anything at the scene of the assault. Do not drink; don't wash your hands, don't brush your teeth, don't shower or clean any part of your body, and don't change your clothes or comb your hair.** It's only natural to want to do these things, but in doing so are destroying evidence for prosecuting the perpetrator. An emergency room doctor will collect evidence using a rape kit for fibers, hairs, saliva, or clothing that the attacker may have left behind.
3. **Go to your nearest hospital emergency room** as soon as possible. It is essential to seek medical attention immediately to be examined, treated for any injuries, and screened for possible sexually transmitted infections (STIs) or pregnancy. During the medical examination, critical evidence will be collected and turned into the police on your behalf. If you've yet to file a police report and you decide you want to do so, you or the hospital staff can call the police from the emergency room. The hospital staff will offer to connect you with the local rape crisis center.

The center staff can help you make choices about reporting the attack and getting help through counseling and support groups.

3. **Call a friend or family member you trust for support. Call a sexual assault crisis center or hotline immediately to talk with a counselor about the traumatic experience you survived.** One hotline is the National Sexual Assault Hotline at 800-656 HOPE (4673). After a sexual assault, it's not uncommon to feel fearful, confused, guilty, ashamed, or isolated. Sexual assaults are terrifying and traumatic, and the psychological effects do not go away if you ignore them. Feelings of shame, guilt, fear, and shock are normal. Getting the appropriate counseling is essential.
4. **Many sexual assaults go unreported. Reporting a sexual assault is an essential process in regaining control. Whether to prosecute the crime or not is your choice. Preserve your options by filing a report with the police. Reporting a sexual assault does not commit you as to further legal action.** In the initial meeting with the police, you are asked to tell them what happened, where it happened, and to describe the attacker. The earlier you report the assault, the easier it will be for police to investigate the crime, and to prosecute the case successfully if that is your choice. Just as collecting medical evidence did, filing the report with the police helps you preserve your options.
5. If you wish to have the assailant prosecuted, the police and the District Attorney's Office will handle the legal proceedings without expense to you. You do not need to hire an attorney.

B. RESOURCES

There are many local, regional and national organizations available to assist you with additional information and support. Don't be afraid to ask for help and support. If you are assaulted sexually, it is not your fault. Don't be scared to ask for help or support. WFI City College is listing a few resources for you to turn to and there are many more.

National Domestic Violence Hotline

800-799 SAFE (7233) or 800-787-3224 (TDD)

National Sexual Assault Hotline

800-656-HOPE (4673)

www.womenshealth.gov

800-994-9662 | TDD: 888-220-5446

Rape, Abuse, and Incest National Network

Phone: 800-656-4673 or 202-544-1034

National Center for Victims of Crime

Phone: 800-394-2255 02 | 202-467-8700 | TDD: 800-211-7996

National Crime Prevention Council

Phone: 202-466-6272

National Domestic Violence Hotline

Phone: 800-799-7233 | TDD: 800-787-3224

National Sexual Violence Resource Center

Phone: 877-739-3895 | 717-909-0710 | TDD: 717-909-0715

Office on Violence Against Women, OJP, DOJ

Phone: 202-307-6026 | TDD: 202-307-2277)

C. REDUCE THE CHANCE OF ASSAULT

1. Don't prop open self-locking doors.
2. Lock your door and your windows, even if you leave for just a few minutes.
3. Watch your keys. Don't lend them. Don't leave them. Don't lose them. And don't put your name and address on the key ring.
4. Watch out for unwanted visitors. Know who's on the other side of the door before you open it.
5. Be wary of isolated spots, like underground garages, offices after business hours, and apartment laundry rooms.
6. Have your keys ready to use before you reach the door, whether at home, your car, or work.
7. Park in well-lit areas and lock the car, even if you'll only be gone a few minutes.
8. Drive on well-traveled streets, with doors and windows locked.
9. Keep your car in good shape with plenty of gas in the tank.
10. If possible, avoid walking or jogging alone. Vary your routes. Create a walking buddy relationship with a classmate.
11. Walk with confidence. The more confident you look, the stronger you appear.
12. Be alert to people passing by and to your surroundings.
13. Use a purse or pocketbook that allows to cross your body with the strap and then hold your bag under your arm.
14. If possible, at night, walk on well-lit and traveled streets.
15. Let someone know where you leave, where you are and when you expect to arrive/return.
16. Avoid alleyways and deserted parking lots.
17. Avoid expose or wearing flashy expensive jewelry.
18. Be cautious of strangers approaching you from behind. Be assertive. Don't let anyone violate your space. Turn around, face them, let them pass and walk ahead.

19. Be cautious of strangers approaching you and asking for time, money, a cigarette or for directions.
20. Do not stop if a car pulls up alongside you.
21. Use common sense, don't jaywalk. Use pedestrian walk lights and crosswalks.
22. Wear shoes that allow you to move quickly or run.
23. Know your route and know the possible safety go-to places on that route.
24. Keep your cell phone within reach if the event you need police assistance.
25. Never hitchhike or pick up a hitchhiker.
26. Always trust your instincts. If you feel uncomfortable in your surroundings, take action to leave the area.
27. Know your limits when it comes to using alcohol

D. BYSTANDER INTERVENTION

1. The term "bystander intervention" refers to non-involved parties to an incident becoming involved. Bystander intervention requires a willingness to do what is right and the courage to intervene safely and appropriately. If you witness a concerning situation you may be able to step in before things escalate further:
 - a. Determine if there is an immediate threat to the safety of oneself or others if so, call 911 for assistance.
 - b. DO NOT put yourself or others in harm's way.
 - c. If the situation has not escalated to the point where law enforcement is required, you may be able to diffuse it successfully, so no one is injured or injured further.
 - d. Subtlety, tact, and humor can be handy tools in diffusing a situation.

2. **A Hypothetical Scenario:** You are among a group of people attending an event or bar. One member of your group is intoxicated, to the point of not being able to make appropriate decisions. Another person appears to take advantage of the situation by suggesting "going up to his or her room or leaving the area." It is evident to you that the intoxicated person is not able to appropriately consent. What can you do?

Possible Intervention Strategies:

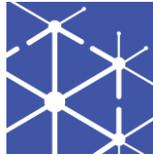
- a. **Be subtle:** "I don't know if that is such a good idea. I think we all have had enough, and we have an early day tomorrow." Often, other bystanders will pick up on the situation, understand your concerns and join in the diffusion.
- b. **Be direct:** "she is not in any condition to go anywhere. Her friends will make sure she is okay, and we are watching out for her." This approach is a bit confrontational, but it can mitigate a situation quickly. You, however, need to determine if a direct plan will make the situation worse.

Be Safe
 Be Proactive
 Be Courageous
 Do the Right Thing

- c. **Create a distraction:** “Hey, I need your help down at the end of the bar. I am going to get a round for everyone, and I need your help to carry them. Can you give me a hand?”

E. REGISTERED SEX OFFENDER INFORMATION

The Dru Sjodin National Sex Offender Public Website (NSOPW) is a public safety resource that provides access to sex offender data nationwide. NSOPW is a partnership between the U.S. Department of Justice and state, territorial, and tribal governments, working together for the safety of adults and children. To look up sex offender data nationwide on the NSOPW database, visit: <http://www.nsopw.gov/en>





Part V

ALCOHOL AND DRUG POLICIES AND PREVENTION PROGRAM

WFI City College complies with the Drug-Free Schools and Communities Amendment of 1989 (Public Law 101-226).

A. WFI CITY COLLEGE DRUG AND ALCOHOL POLICY

1. WFI City College is committed to providing students, faculty and staff an environment free of disruptive and dangerous behavior. In keeping with this commitment, the Institute, to the best of its abilities and resources, ensures an environment that is free of alcohol and other drugs, including prescription medication and substances causing impaired performance.
2. The unlawful manufacture, distribution, sale, possession or use of illicit drugs or alcohol by student, faculty or staff in or surrounding WFI City College facilities, or at any off-campus activity or event sanctioned by the Institute are strictly prohibited. Students or employees who violate this policy are subject to disciplinary action up to and including expulsion or termination of employment.
3. In addition to WFI City College sanctions, students, faculty, and staff who violate this policy can be subject to criminal prosecution under local, state, and federal law. WFI City College reports students, faculty, and staff who break the law to appropriate law enforcement officials.
4. In some instances, students, and employees are told to attend alcohol and substance abuse help centers. If referred, then continued enrollment or employment will be subject to successful completion of a formal evaluation, treatment, and any prescribed counseling.
5. All expenses directly or indirectly associated with a violation of local, state or federal drug and alcohol laws including evaluation, treatment and counseling and corrective actions taken by WFI City College up to and including dismissal, will be the responsibility of the student.

6. Student and employees who believe that they have a substance abuse problem who wish to seek treatment of their own accord may contact the Campus Director or the Senior Security Authority for referral assistance. All matters are confidential. Students and employees who haven't been charged with either the manufacture, distribution, sale, possession or use of illicit drugs or alcohol in or surrounding WFI City College facilities who seek a referral from the Campus Director or Senior Security Authorities will not be subject to policy sanctions.
7. Students, faculty, and staff may report a violation observed on or surrounding WFI City College premises to either the Campus Director or the WFI Senior Security Authority.
8. Faculty, staff, and students employed under the Federal Work Study Program receive related personnel policies, in addition to this booklet to educate them about the provisions of the Drug-Free Workplace Act of 1988. Institutions participating in campus-based programs must maintain a drug-free workplace. Employees must notify the WFI City College Campus Director in writing of a conviction on a criminal drug statute occurring in the workplace within five days after receiving such the conviction. Disciplinary action will take place within 30 days of notification and can range from a letter of admonishment, suspension from school or work, and enrollment in a rehabilitation program to termination from school or employment.

B. FACTS AND IMPLICATIONS

1. There are numerous legal sanctions under local, State, and Federal law which punish violators. Penalties can range from suspension, revocation, and denial of a driver's license to mandatory community service, mandatory drug alcohol treatment counseling, imprisonment, and property seizure.
2. Students can lose eligibility for financial aid, Social Security, retirement, welfare, health, disability and veteran's benefits. The Department of Housing and Urban Development, which provides funds to states and communities for public housing, now has the authority to evict residents and members of their household who are involved in drug-related crimes on or near the public housing premises. Finally, a record of a felony conviction in a drug-related crime may prevent a person from continuing their careers or entering specific new professions.
3. The laws of the State are adequate to protect the innocent and stringent enough to ensure that person that persons involved with the illegal dealing of drugs or excessive use of alcohol face punishment.
4. In addition to local and state authorities, the federal government has four agencies involved in the fight against illicit drugs. These agencies are The Drug Enforcement Agency, U.S. Customs, Federal Bureau of Investigation and the U.S. Coast Guard.

5. It is a crime to hold someone else's drugs. It is a crime to sell drugs. You can face arrest if you are in a house where people are using and drugs, even though you are not. You are considered to possess and can be charged with possession of drugs if drugs are in your pocket, purse, backpack, locker, car or house.
6. Drug abuse is the utilization of natural and synthetic chemical substances for a non-medical reason to affect the body and its processes, the mind and nervous system and behavior. The abuse of drugs can affect a person's physical and emotional health, work and social life. Alcohol is the most abused drug in the United States.
7. Drugs can be highly addictive. People tend to lose their sense of responsibility and coordination when using. Restlessness, irritability, anxiety, paranoia, depression, slowed movement, inattentiveness, loss of appetite, sexual indifference, convulsions, comas, or even death can result from overuse or abuse of drugs.

C. FEDERAL PENALTIES FOR ILLEGAL POSSESSION OF A CONTROLLED SUBSTANCE

1. **21 U.S.C. 844(a)**
 - **1st conviction:** Up to 1 year imprisonment and fined at least \$1,000 but not more than \$100,000, or both.
 - **After One (1) prior drug conviction:** At least 15 days in prison, not to exceed two (2) years and fined at least \$2,500 but not more than \$250,000, or both.
 - **After Two (2) or more prior drug convictions:** At least 90 days in prison, not to exceed three (3) years and fined at least \$5,000 but not more than \$250,000, or both.
2. **Special sentencing provisions for possession of crack cocaine: Mandatory at least five (5) years in prison, not to exceed 20 years and fined up to \$250,000, or both, if:**
 - 1st conviction and the amount of crack possessed exceed 5 grams.
 - 2nd crack conviction and the amount of crack in possession exceeds 3 grams.
 - 3rd or subsequent crack conviction and the amount of crack in possession exceeds 1 gram.
3. **21 U. S. C. 853 (A)(2) AND 881 (A) (7)**
 - Forfeiture of personal and real property used to possess or facilitate possession of a controlled substance if that offense is punishable by more than 1 year imprisonment.
4. **21 U. S. C. 861 (A) (4)**
 - Forfeiture of vehicles, boats, aircraft or any other conveyance used to transport or conceal a controlled substance.

5. **U. S. C. 844a**
 - Civil fine up to \$10,000 (pending adoption of final regulations).
6. **21 U. S. C. 853a**
 - Denial of Federal benefits, such as student loans, grants, contracts, and professional and commercial licenses, up to 1 year for the first offense, up to 5 years for second and subsequent offenses.
7. **18 U. S. C. 922(8)**
 - Ineligible to receive or purchase a firearm.
8. **Miscellaneous**
 - Revocation of specific Federal licenses and benefits, e.g., pilots' licenses, public housing tenancy, etc., is vested within the authorities of individual Federal agencies.
 - These are Federal penalties and sanctions. Additional State penalties and sanctions may apply.

D. PENALTIES FOR ILLEGAL POSSESSION IN PENNSYLVANIA

1. In addition to those above stated federal consequences state and local ordinances provide for additional legal penalties for unlawful possession or distribution of illicit drugs and alcohol.
2. In the Commonwealth of Pennsylvania, a person convicted of possession of a small amount of marijuana for personal use or distribution without the intent to sell can be subject to imprisonment not exceeding one year and a fine not exceeding \$5,000 (Chapter 35, Section 780-113).

F. WFI CITY COLLEGE DRUG AND ALCOHOL-FREE AWARENESS PROGRAM (DAFAP).

1. **Phase One: Clear Commitment to a Drug and Alcohol-Free Environment**

WFI City College has written alcohol and drug policies and a prevention program compliant with The Drug-Free Schools and Communities Act of 1989 (Public Law 101-266). These policies published under the Consumer Information Tab on the Institution website and are disseminated in writing and discussed with all new students and new during orientation.
2. **Phase Two: Drug and Alcohol Abuse Prevention, Education and Support Resources**

Information on resources and community organizations available to help individuals with substance abuse problems is available in print in the WFI City College Library. The literature encourages individuals with a drug or alcohol use problems, or both, to take the initiative to

seek guidance from professionals with treatment expertise. The following resources are provided to support independent outreach.

- **Alcoholic Anonymous:** support for people who want to achieve sobriety www.aa.org
- **Narcotics Anonymous:** support in a recovery environment for people who abuse substances www.na.org
- **Substance Abuse and mental health Services:** U.S. Department of Health and Human Services agency “that leads public health efforts to advance the behavioral health of the nation... and whose mission is to reduce the impact of substance abuse and mental illness on America’s communities.” www.samhsa.gov/

3. **Phase Three: Required Drug Counseling, Rehabilitation, and Assistance Programs**

The student will be required to actively participate in a drug or alcohol abuse assistance or rehabilitation program approved by federal, state, or local health, law enforcement or another appropriate agency.

- Alcohol & Drug Abuse 24 Hour Action Help Line & Treatment (844-244-3171)
- Alcoholics Anonymous, 4318 Frankford Ave, Philadelphia, PA 19124 (215-535-9609)
- Northeast Treatment Centers, 499 North 5 Street, Philadelphia, PA (215-451-7000)
- One Day at a Time, 2532 North Broad Street, Philadelphia, PA (215-221-1033)
- Valley Forge Medical Center, 1033 W. Germantown Pike, Norristown, PA (610-539-8500)

4. **Phase Four: Non-Compliance with the School’s Drug-Free Workplace Policy:**

Dismissal or termination will result if a student or employee fails to comply with the Institute’s policies and fails to complete with or complete successfully prescribed drug counseling and rehabilitation program.

