

GONZAGA-IN-FLORENCE

Annual Security & Fire Safety Report

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A Publication of the Gonzaga-In-Florence Program

In compliance with the Clery Act

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Spokane, Washington

All University policies, practices and procedures contained in this Guide are consistent with Gonzaga's Catholic, Jesuit identity and Mission Statement.

UNIVERSITY POLICIES: Gonzaga-In-Florence community members have a responsibility to be familiar with and adhere to University policies, rules and expectations. Specific policy information is printed in the GIF Student Handbook and the Gonzaga University Student Code of Conduct. A copy of the Gonzaga University Student Code of Conduct is available to all students, staff, and faculty members through the Gonzaga website at: <https://www.gonzaga.edu/student-life/student-services/resolution-center/student-code-of-conduct>

DISCLAIMER: The Director of the Gonzaga-In-Florence program or his/her designee shall resolve any questions involving the application or interpretation of policies and procedures set forth in this guide. In such instances the decision of the Director shall be final and binding, unless the situation is of so serious a nature that it is referred by the Gonzaga-In-Florence Director to administrators on the main campus of Gonzaga University for resolution.

The Director of the Gonzaga-In-Florence program reserves the right to change any of the policies, procedures and content included in this guide at any time.

The on-line version is considered the official publication of this guide. Any printed version may not reflect the exact content of the on-line version. Discrepancies between the on-line version and any printed version of the guide will be resolved in favor of the on-line version.

Report published Oct. 2019 includes policies for the calendar year 2018 and statistics for the calendar years 2016-2018.

INTRODUCTION

The Gonzaga-In-Florence (GIF) program has a rich history of more than 50 years. The present location of the main campus building has been home to the program since academic year 2003-2004. The majority of the academic program, as well as all of the administrative functions, occur at this location. It is the center of the GIF community.

Nearly all students enrolled in the program reside in privately-owned pensioni, contracted through the program, within moderate walking distance of the GIF building. The pensioni must meet minimum standards established by the Italian government, as well as by the GIF program. The formalized contracts between the GIF program and the pensioni owners are such that the pensioni qualify as Clery reportable on-campus housing. All pensioni are within one mile of the administrative building. Students access their pensioni by key or key code, access varies by pensione. The GIF program does not have any officially recognized student groups with off-campus housing facilities. The GIF program also offers home-stay opportunities.

The safety and security of all members of the GIF community is of utmost importance. Fostering a safe environment for people and property is a responsibility shared by all members of the community.

The GIF program and campus does not have a campus security or police department. Productive relationships have been established with the police agencies that serve the campus and area, particularly the Polizia Di Stato. The GIF program does not have a formalized memorandum of understanding with these police agencies for the investigation of criminal offenses, nor does it have any written agreements between GIF and local law enforcement agencies. More information about the Polizia Di Stato is available at the following web site: <http://www.poliziadistato.it>. Police and fire response agencies that serve the GIF campus are familiar with the building's location and layout.

A doorperson for the administrative building is retained by the program for purposes of monitoring building access and checking doors in the evening. This doorperson has no arrest powers. The building is locked even during business hours, with monitored access via a keycard entrance system. All student entrances and exits are logged in a cloud-based software system. In the evening, access is granted via keypad and check-in procedure with the door person. Video surveillance is utilized during the day and at night.

All GIF administrators are keenly aware of the need for awareness and vigilance regarding security and are instructed how to respond appropriately to emergencies and safety/security situations in the building. All staff are trained to Italian government standards related to safety and first aid. Necessary repairs and preventive maintenance are noted in a timely work order and forwarded to the appropriate person for resolution.

EMERGENCY REPORTING

Students who are experiencing an emergency should immediately contact the local emergency phone number(s): 112 or 113. There are a number of different types of police in Florence with different levels of authority. Firstly, there are the Carabinieri, the military police, who intervene at all levels in order to maintain public order. They respond, very quickly, to all calls made to 112 and their cars or vans (which are navy blue with a red stripe along the side) can be seen either stationed in the major squares, piazzas,

or patrolling the streets at intervals, both day and night. Secondly, there are the State Police, Polizia di Stato, who respond to all calls made to 113. Like the Carabinieri they can be seen patrolling the city (in light blue and white cars) both day and night. Thirdly, there is the Vigili Urbani or Polizia Municipale, the traffic police, whose responsibility is limited to monitoring, driving and parking etc. and who frequently issue very hefty fines for driving and parking offences. And fourthly, there is la finanza, the fiscal police, who are called upon to intervene in all fiscal matters. Students should contact the local emergency numbers (112 or 113) if they need immediate assistance. We highly encourage University community members to promptly and accurately report crimes to the local police in circumstances that a victim elects to or is unable to make the report. After calling the local emergency number, students should notify someone from GIF administration. If they are in their pensione, they should call the local emergency number and then immediately notify the front desk and someone from the GIF administration. They may also contact one of the Student Development staff if they need assistance interpreting or with follow-up. Contact numbers for GIF staff are listed in the Crime Reporting section below. When calling law enforcement, be prepared to provide the following information:

- Your name, phone number, and your exact location. Know the name of the building that you are in, as well as the street address or the closest cross streets.
- The nature of your emergency, including who, what, how, when, and where
- If the suspects have left the scene, give a complete description and direction of travel if possible. Give any vehicle information. Tell the operator if any weapons were seen or used
- For a fire, tell the operator if there is visible smoke or fire, what type of building it is and if there are injuries
- For a medical incident, give the age and condition of the victim, as well as what caused the situation (seizure, slip and fall, car accident, etc.)

NON-EMERGENCY CRIME REPORTING

In addition to reporting emergencies to the local emergency number, if necessary, crimes and suspicious situations which are non-emergency in nature should also be reported to school administrators (see list below) as soon as is possible and practical after the reporting party becomes aware of the situation. Crimes and suspicious situations that occur not just in the GIF building, but also in the pensioni and on school-sponsored trips should be reported. Students are encouraged to report to both local police and GIF administrators promptly and accurately. Confidential and non-confidential reports from all sources are evaluated to determine if issuing an emergency notification or timely warning to the community is appropriate, and are used to formulate the required annual crime statistics. As long as the reporting procedures do not violate Title IX responsible employee requirements, a victim or witness of a crime can provide a voluntary, confidential report of a crime for inclusion in the Annual Security Report by contacting the GIF Director (contact information listed on page 5) or by contacting the Clery Compliance Coordinator at jordant@gonzaga.edu.

When a GIF administrator receives a report of a crime, an evaluation is made to determine the level and type of response. A GIF representative will assist the victim in making a report with local police. Community members are strongly encouraged to report crimes against persons directly to the local police at the time the crime occurs.

The administrators listed below should be contacted with information about criminal incidents and emergencies and situations which present a continuing threat to the community. Reports should also be made to these administrators for inclusion in the annual crime statistics.

Jason Houston, Ph.D.,
Director, Gonzaga-In-Florence
Room 116
Cell +39 334 798 2573
Houston@gonzaga.edu

Frederica Dionisio
Assistant Director, Student Development
Room 203
Cell +39 340 162 1805
Dionisio@gonzaga.edu

Student Development Staff
Mozilo Center

*Please use the listed cell phone numbers only for reporting crimes and emergencies to GIF administrators.

Reports received by these individuals are forwarded to Assistant Director for Student Development at GIF, who will document the incident, generally after meeting with the affected student(s). The Assistant Director can assist with explaining resources and processes within the GIF program, as well as the Italian criminal justice system, and make referrals to appropriate departments and outside agencies.

A GIF administrator will evaluate all crime reports and make further inquiries if necessary, as well as make a determination if the incident requires a "Security Alert" to the community (see below). All reports are also evaluated for inclusion in the required yearly Clery crime statistics. This evaluation includes information received confidentially.

Ordained religious professionals and professional mental health counselors employed by the University have a professional obligation to maintain confidentiality information disclosed during a counseling session. The University does not include statistical information about crimes from such sessions unless provided to the Clery Compliance Coordinator (jordant@gonzaga.edu) on a confidential and voluntary basis, withholding any personally identifying information. The University allows pastoral and professional counselors, if they deem appropriate, to advise clients of the options for reporting a criminal incident to the Clery Compliance Coordinator on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics. There are no formal university policies that reinforce or directly encourages counselors to this option.

SEXUAL MISCONDUCT/HARRASSMENT RISK REDUCTION

Crimes may be reported to GIF administrators on a confidential basis if the reporting party doesn't wish to pursue criminal or University disciplinary action. Anonymous reports of rape and sexual assault can be made via an Anonymous Sexual Assault report form, available throughout the building. Reports can also

be made anonymously and non-anonymously through the Sexual Conduct, Intimate Partner Violence and Gender-Based Harassment Report Form on the Gonzaga University website: www.gonzaga.edu/sexualmisconductform. More information on University sexual misconduct policies and procedures, and a full list of resources available can be found on page 17.

No victim is EVER to blame for being assaulted or abused. Anyone can be sexually assaulted, and there are no sure means to prevent sexual assault because the only people who can prevent sexual assault are those who perpetrate it. However, below are some tips to help recognize warnings signs of abusive behavior and help to reduce the risk of a potential attack.

WARNING SIGNS OF ABUSIVE BEHAVIOR:

Domestic and dating abuse often escalates from threats and verbal abuse to violence. And, while physical injury may be the most obvious danger, the emotional and psychological consequences of domestic and dating violence are also severe. Warning signs of dating and domestic violence include:

1. Being afraid of your partner;
2. Constantly watching what you say to avoid a “blow up;”
3. Feelings of low self-worth and helplessness about your relationship;
4. Feeling isolated from family or friends because of your relationship;
5. Hiding bruises or other injuries from family or friends;
6. Being prevented from working, studying, going home, and/or using technology (including your cell phone);
7. Being monitored by your partner at home, work or school; and
8. Being forced to do things you don’t want to do.

SEXUAL ASSAULT RISK REDUCTION¹:

1. Try not to leave your drink unattended.
2. Only drink from un-opened containers or from drinks you have watched being made and poured.
3. Avoid group drinks like punch bowls.
4. Cover your drink. It is easy to slip in a small pill even while you are holding your drink.
5. If you feel extremely tired or drunk for no apparent reason, you may have been drugged. Find your friends and ask them to leave with you as soon as possible.
6. If you suspect you have been drugged, go to a hospital and ask to be tested.
7. Keep track of how many drinks you have had.
8. Try to come and leave with a group of people you trust.
9. Avoid giving out your personal information (phone number, where you live, etc.). If someone asks for your number, take his/ her number instead of giving out yours.

BEING A SAFE BYSTANDER:

1. Always take your personal safety into consideration before acting as a bystander.
2. Involve others, if possible.
3. Take note of your surroundings and notice potential issues in intervention.
4. Maintain a calm and collected tone of voice if intervening directly.
5. Call local law enforcement at 112 or 113 if you feel you cannot safely intervene.

¹ Provided by Rape, Abuse & Incest National Network (RAINN)

Italian law differs from U.S. federal and state law with regards to sex offenders and the obligation for those persons to register. A publicly accessible register, either on-line or in paper form, may or may not be available. Interested or concerned persons should contact a local law enforcement agency in Italy for guidance.

BEHAVIORAL INTERVENTION TEAM

Gonzaga-In-Florence community members can utilize the Gonzaga University Behavioral Intervention Team, located in Spokane, WA to report concerning behavior. Gonzaga's Behavioral Intervention Team (BIT) was established for the purpose of early identification, assessment, intervention, and management of incidents and behaviors that pose a risk to the safety and well-being of the Gonzaga community. The BIT relies on information from community members in order to identify and address potential threats. While the team analyzes patterns of behavior and takes a holistic approach towards threat assessment, certain warning behaviors can shed light on the need for a full scale investigation. Some warning signs that community members should look for include (but are not limited to) the following behaviors:

- Violent fantasy content in writings, social media posts, and viewing of materials
- Anger problems
- Making threats
- Boasting and practicing of fighting
- Unusual interest in police, military, terrorist activities and materials
- Isolation and/or social withdrawal
- Suicidal ideation
- Homicidal ideation
- Stalking
- Non-compliance and disciplinary problems
- Imitation of past murderers
- Interest in previous shooting situations
- Victim/martyr self-concept
- Strange or aberrant behavior
- Paranoia
- Violence and cruelty
- Inappropriate affect
- Acting out
- History of police contact
- Mental health history related to dangerousness
- Expressionless face/anhedonia
- Excessive use of alcohol/drugs

To contact the BIT about a potential threat or concern or to obtain more information about Gonzaga's threat assessment process, please use the following resources:

BIT Coordinator Email: BIT@gonzaga.edu

BIT Coordinator Phone: 001-509-313-2224

Behavioral Intervention Team Web Page & Reporting Form: <https://my.gonzaga.edu/campus-resources/campus-security-public-safety/crime-reporting/behavioral-intervention-team>

EMERGENCY RESPONSE AND NOTIFICATION PROCEDURES

Emergency notifications are to be issued in the case of an immediate threat to the health or safety of our community. Gonzaga will immediately notify the campus community upon confirmation of an emergency or dangerous situation. Gonzaga University may be notified of an actual or potential emergency impacting the University through several sources, including:

- Gonzaga community members
- Members of the public
- Emergency response personnel
- Emergency management personnel
- Media (traditional and social) reports

Notification may occur through the use of the building's public address system, email messaging, social media, texting or phone calling trees. The Director of the GIF program, along with the Assistant Director for Student Development and other appropriate officials are responsible for determining whether a threat exists and has been confirmed, and for initiating the notification process. Confirmation of the threat may be ascertained via communication with local police and emergency responders, U.S. or Italian government officials, on-site observation or reliable witness reports. Confirmation and assessment of the threat is an on-going process.

Upon confirmation of a threat, the GIF program will, without delay, and taking the safety of the campus community into account, determine the content of the notification and initiate the notification system(s) unless issuing a notification will, in the professional judgement of responsible authorities, compromise efforts to assist a victim or to contain, respond to or otherwise mitigate the emergency. The notification will provide basic information about the threat and how campus community members should respond, for example, remain in place or evacuate to a specified location. Information, instructions and the scope of the notification may change as the situation evolves.

The GIF officials will work in conjunction with Gonzaga officials on the main campus in Spokane to provide information to the larger Gonzaga community regarding an emergency. This may be done via Priority Mail email or by official University social media accounts. If it is appropriate to notify the local community of the emergency to the GIF program, this will be done in consultation with local emergency responders.

The GIF program reviews and tests its emergency response and evacuation procedures and system(s) on an annual basis. Notification to the campus community of testing is publicized via email messaging and the Ciao newsletter. Documentation of testing is maintained in the office of the Assistant Director for Student Development and includes a description of the test, the date and time of the test, and whether the test was announced or unannounced.

TIMELY WARNINGS AND SECURITY NOTICES

Reports received by GIF administrators and information provided by local police or the American consulate (when available) are used to formulate immediate and longer-term responses to safety and security issues. Timely Warnings are issued to inform the Florence community about Clery Act Crimes (pages 12-13) that present an immediate, serious, or ongoing threat to the community. Often, the intent

is to alert community members of a potentially dangerous criminal situation or an ongoing community threat so that they have the time and information necessary to take appropriate precautions, and prevent similar crimes. Timely warnings will include specific details on the type of crime(s), general location of the crime(s), and any relevant instructions or recommendations for promoting safety and reducing the risk of similar crimes from occurring. When conditions warrant it, the Director or Assistant Director for Student Development (or their designee) will develop and issue a timely warning via a "Security Alert" to the GIF community. The "Security Alert" is distributed primarily via email, but may also be posted on bulletin boards throughout the GIF building and in the pensioni, as well as on closed group Facebook page. The university will issue Timely Warnings on a case-by-case basis considering the following criteria: (1) one of the below listed Clery crimes are reported; (2) the crime occurred within the University Clery geographical boundaries; and (3) there is a substantial risk to the safety of other members of the campus community because of this crime. A lower priority "Security Notice" may be issued for certain incidents or when trends or patterns of crime are seen, or pertaining to a crime that occurred outside of Clery geography (pages 14-15) if it is a location used and frequented by the student population.

SAFETY PROGRAMS AND EDUCATION

The GIF Orientation program serves as the main program designed to inform students and employees about campus security procedures and practices. Orientation occurs once per semester and covers topics related to safety and security, as well as information provided by the American Consulate. All GIF students, including those who are not visiting from the Spokane campus, are required to participate in Orientation. The safety and security portion of this program provides students with instructions on what to do in the case of an emergency, instructions on how to travel safely, and information about foreign driver and pedestrian safety. Students are provided with an emergency card which includes personal information about themselves and the numbers of the school administration and other useful emergency contact information. Students are asked to carry this card along with their passport when they are traveling so they can contact Gonzaga-In-Florence and/or the nearest U.S. Embassy or consulate if they are not in Florence when a crisis occurs. Other programs related to security procedures and practices are implemented on an as-needed basis.

GIF Orientation also serves as the main program designed to inform students about the prevention of crimes. Instructions are provided on topics including: financial/credit card security, avoiding political demonstrations, common sense safety guidance, common sense drug and alcohol guidance including the influence of drugs and alcohol on the potential to become the victim of a crime, and sexual misconduct/assault prevention. In order to raise awareness about sexual misconduct abroad, all GIF students are additionally required to read mandatory content focusing on sexual violence and relationships abroad, and confirm with administration that they have read the material. The University prohibits the crimes of dating violence, domestic violence, sexual assault, and stalking, as defined by the Clery Act. The definitions of dating violence, domestic violence, sexual assault, stalking and consent can be found in the "Definitions under Italian Law" section on page 27. Information on sexual assault risk reduction can be found on page 6. The university also conducts ongoing prevention and awareness campaigns for students, staff, and faculty on issues related to domestic violence, dating violence, and stalking. Ongoing prevention and awareness campaigns are developed and promoted by the Office of Health Promotion. Each year Gonzaga participates in both Domestic Violence Awareness Month (October) as well as Sexual Assault Awareness Month (April). These campaigns are intended to raise

awareness and promote campus action. Campaigns may take place over social media, and through the established communication channels for the GIF program. Any questions regarding Gonzaga University's awareness and prevention programming around sexual misconduct, harassment and discrimination issues can be directed to the Office of Health Promotion at ohp@gonzaga.edu. Questions about GIF Orientation or mandatory safety programming can be directed at the GIF Director. There are no crime prevention programs specifically targeting employees.

All Gonzaga University students are required to complete an online education course titled Zag Into Action. This program is designed to familiarize students to the Gonzaga University bystander intervention program, Zags Help Zags. The program is provided annually, yet students are only required to take the course prior to their first year. Additional Zags Help Zags trainings are offered throughout the year at the Spokane campus. Students are introduced to bystander intervention strategies and are given opportunities to think critically about the ways in which they might apply these strategies in person to promote well-being and prevent harm. This program encourages the campus community to look out for themselves and others. This program was launched fall 2018. Students who started Gonzaga University prior to 2018 starting received an in person Zags Help Zags bystander intervention training during orientation weekend. Students studying at GIF who are not visiting from the Gonzaga Spokane campus did not receive these trainings. Information for how to safely act as a bystander can be found on page 6.

The daily "Ciao" newsletter is distributed via email around 10:00AM, Monday through Thursday. The Ciao can be used to provide information about any safety and security advisories for the campus community. In addition, other printed materials such as the GIF Orientation booklet and Student Handbook, and information distributed during Opening Tour in the fall, provide information on safety and security procedures and crime prevention on campus, in the pensioni, and while traveling. These materials are distributed to each student in the fall (or when that student begins the program) and are also distributed to GIF staff and faculty. The purpose of presenting this information is to encourage community members to be responsible for their own security and the security of others.

DRUG AND ALCOHOL ABUSE RESOURCES AND EDUCATION PROGRAMS

Gonzaga encourages students who suspect they may have a problem associated with alcohol or other substance abuse to seek assistance through campus resources such as the Student Development Office, the Campus Health Center, and the Counseling Center. The GIF Director can connect students to these resources. The University may refer students with problems beyond its means to outside rehabilitative or counseling services. For further information about the University's compliance with the Drug-Free Schools and Campuses Regulations and the Higher Education Act, the University's drug and alcohol policies, and programs specific to drug and alcohol abuse education, refer to the 2018 Drug Free Schools and Communities Act, which can be viewed in its entirety at <https://www.gonzaga.edu/about/our-campus-location/campus-safety/about-campus-security-public-safety/drug-free-schools-and-communities-act>.

THE CLERY ACT

The "Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act" was originally enacted in 1990. It is commonly known as the Clery Act and has been amended several times since its inception. The two initial goals of this legislation were to disclose campus crime statistics on an annual basis and to provide timely warnings to the campus community about criminal activity. The most recent

amendments added provisions related to fire safety awareness and missing students in campus residential facilities and also afforded additional rights to campus victims of sexual assault, domestic violence, dating violence, and stalking. Gonzaga University supports the goals of the Clery Act, and publishes this Annual Security Report in order to provide transparency in campus criminal activity, to foster community awareness and to increase knowledge of safety provisions. The report is prepared by the Clery Compliance Coordinator, in conjunction with the Director of GIF.

The Clery Act requires annual reporting of the number of specified criminal offenses that occur on campus or surrounding campus and are reported to GIF administration, or Gonzaga Campus Security & Public Safety. The list of Clery crimes and their definitions can be found on pages 12-13. The reporting period is January 1 - December 31 of each year. The statistics for the most recently completed calendar year, as well as the two previous years, must be released in a report by October 1 of each year. The Clery Act also requires the institution to maintain a Daily Crime and Fire Log. These logs are maintained on the GIF website.

The Clery Compliance Coordinator evaluates GIF reports for inclusion in the Clery statistics. Additionally, the Resolution Center for Student Conduct and Conflict prepares an extract report of disciplinary referrals for violations of alcohol, drug, and weapon laws by GIF students. Requests for crime statistics specific to the GIF Clery geography from local law enforcement in Florence are made on an annual basis. An internal audit of incidents classified as Clery-reportable is conducted to test individual statistics against incidents. Fire statistics and fire safety disclosures are provided by the GIF Director.

The Clery Act also requires that this Annual Security Report includes a number of disclosure statements by the institution related to University policies and procedures. Specific provisions of this law stipulate that all students, staff, and faculty of an institution receive this report. In addition, the crime statistics are reported to the Department of Education. Information about the U.S. Department of Education's collection and publication of CSPS statistics, including definitions of crimes and other terms related to the Clery Act may be found at: <https://ope.ed.gov/campussafety>

CAMPUS SECURITY AUTHORITIES

The Clery Act recognizes certain university officials and offices as "Campus Security Authorities" (CSAs). Under Federal Law CSA's are required to report a crime. The Act defines these individuals, among other individuals, as "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 judicial proceedings. An official is defined as a person who has the authority and the duty to take action or respond to particular issues on behalf of the institution." These individuals are identified and trained by the Clery Compliance Coordinator on an annual basis. CSAs are trained either through an online training with testing, or in booklet form, depending on departmental preference. In the event that an identified CSA witnesses or is made aware of the occurrence of a Clery Act crime within Clery geography, they are required to immediately report the crime to the GIF Director, who then reports to CSPA. Reports may be made confidentially to protect the identity of the victim. For more information about CSAs and their responsibilities, refer to the CSA webpage at <https://my.gonzaga.edu/campus-resources/campus-security-public-safety/the-clery-act/campus-security-authorities>.

CLERY CRIME DEFINITIONS

Murder/Manslaughter – The willful killing of one human being by another.

Negligent Manslaughter – The killing of another person through gross negligence.

Sexual Assault - Any sexual act directed against another person, without consent of the victim, including instances where the victim is incapable of giving consent. This includes Rape, Fondling, Incest, and Statutory Rape as defined by the Clery Act.

Rape – Penetration no matter how slight of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim. This offense includes the rape of both males and females.

Fondling – The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental or physical 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.

Robbery – Taking or attempting to take anything of value from 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.

Burglary – Unlawful entry of a structure to commit a felony or a theft.

Motor Vehicle Theft – Theft or attempted theft of a motor vehicle.

Arson – Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle, or aircraft, or personal property of another, etc.

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

- By a current or former spouse or intimate partner of the victim;
- By a person with whom the victim shares a child in common;
- By a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner;
- By a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred;
- 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. 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. Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. Dating violence does not include acts covered under the definition of domestic violence.

Stalking - Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for the person's safety or the safety of others; or suffer substantial emotional distress. 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.

Liquor Law Violations - The violation of local laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, or use of alcoholic beverages, not including driving under the influence and drunkenness.

Drug Law Violations - The violation of laws prohibiting the production, distribution, and/or use of certain controlled substances and the equipment or devices utilized in their preparation and/or use. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation, or importation of any controlled drug or narcotic substance. Arrests for violations of local laws, specifically those relating to the unlawful possession, sale, use, growing, manufacturing, and making of narcotic drugs.

Weapons Law Violations - The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices, or other deadly weapons.

Hate Crime – A criminal offense that manifests evidence that the victim was intentionally selected because of the perpetrator's bias against the victim. Clery Act bias categories include race, religion, sexual orientation, gender, gender identity, ethnicity, national origin, and disability.

CLERY GEOGRAPHY DEFINITIONS

On-Campus Non-Housing – Any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institution's educational purposes, including residence halls; and is frequently used by students, and supports institutional purposes.

On Campus Housing – Any student housing facility that is owned or controlled by the institution, or is located on property that is owned or controlled by the institution, and is within the reasonably contiguous geographic area that makes up the campus is considered an on-campus student housing facility. Includes buildings that are owned by a third party that has a written agreement with the institution to provide student housing.

Public Property – All public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus.

Non-Campus – 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.

CLERY MAP AND LOCATIONS

Gonzaga-In-Florence Building:

- Via Giorgio la Pira, 11/13, 50121 Firenze FI, Italy

On Campus Residential Buildings:

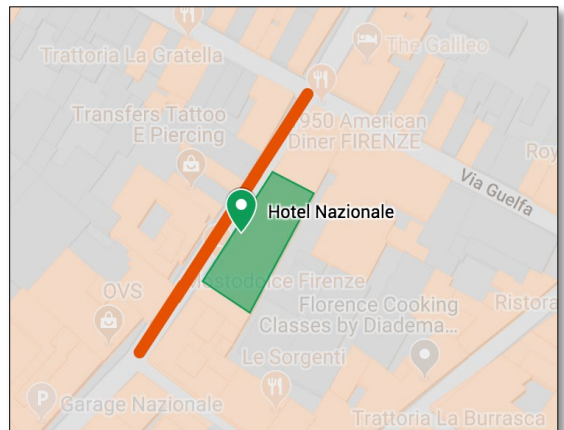
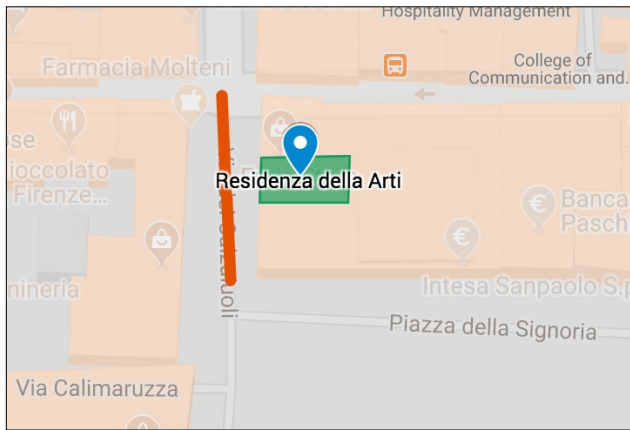
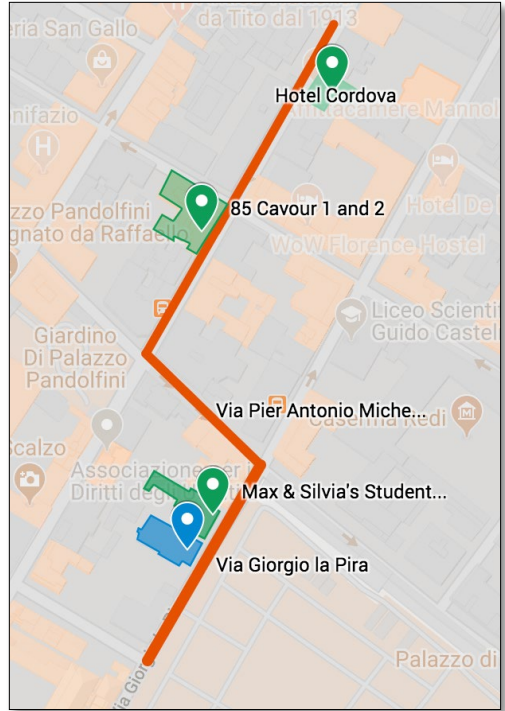
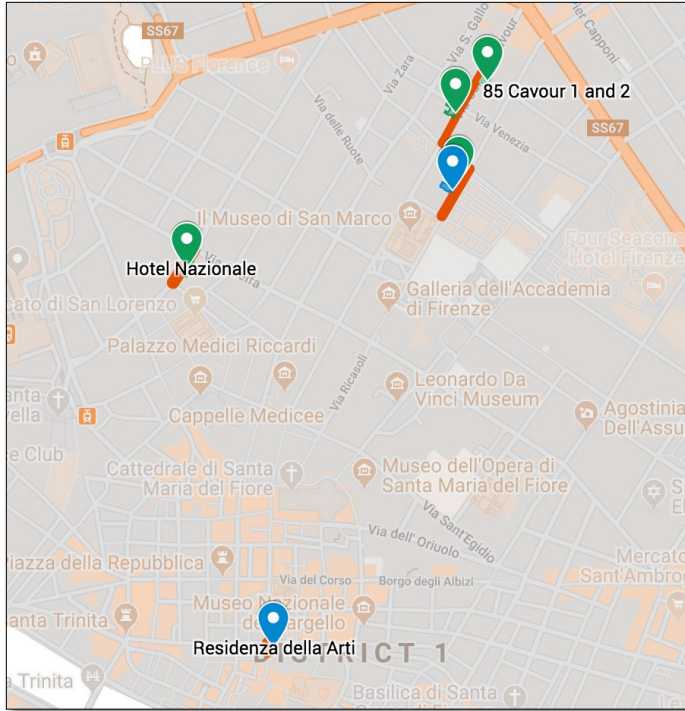
- Via Nazionale, 22, 50123 Firenze FI, Italy
 - Hotel Nazionale & Holiday Rooms
- Via Camillo Cavour, 85, 50121 Firenze FI, Italy
 - 85 Cavour 1 and 2
- Via Camillo Cavour, 96, 50129 Firenze FI, Italy
 - Hotel Cordova
- Via Giorgio la Pira, 17, 50121 Firenze FI, Italy
 - Max & Silvia Student's House
- Via dei Calzaiuoli, 2, 50122 Firenze FI, Italy (Aug-Dec only)
 - Residenza delle Arti

Public Property:

- Via Giorgio La Pira
- Via Pier Antonio Micheli
- Via Camillo Cavour
- Via Nazionale
- Via dei Calzaiuoli (Aug-Dec only)

Mapping Legend:

- On Campus Non-Residential
- On Campus Residential
- Public Property



CLERY ACT STATISTICS 2016-2018

	2018				2017				2016			
CRIMINAL OFFENSES	On-Campus		Non-Campus	Public	On Campus		Non-Campus	Public	On Campus		Non-Campus	Public
	Non-Housing	Housing			Non-Housing	Housing			Non-Housing	Housing		
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0	0	0	0
Manslaughter: Negligent	0	0	0	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0	0	0	0
Burglary (& Attempted Burglary)	0	1	0	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft (& Attempted MVT)	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0
VAWA OFFENSES												
Domestic Violence	0	0	0	0	0	0	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0	0	0	0	0	0	0
Stalking	0	0	0	0	0	0	0	0	0	0	0	0
ARRESTS												
Weapons Arrests	0	0	0	0	0	0	0	0	0	0	0	0
Drug Arrests	0	0	0	0	0	0	0	0	0	0	0	0
Alcohol Arrests	0	0	0	0	0	0	0	0	0	0	0	0
CONDUCT REFERRALS												
Disciplinary Referrals for Weapons	0	0	0	0	0	0	0	0	0	0	0	0
Disciplinary Referrals for Drugs	0	0	0	0	0	0	0	0	0	0	0	0
Disciplinary Referrals for Alcohol	0	0	0	0	0	0	0	0	0	0	0	0

Notes: After an assessment of pension contracts, the calendar year 2018 is the first year that GIF is reporting statistics and fire safety information for on campus residential facilities. There were no hate crimes meeting Clery criteria reported in 2018, 2017, and 2016.

SEXUAL MISCONDUCT AND HARASSMENT REPORTING, POLICIES AND PROCEDURES

What to Do If You Experience Sexual Harassment or Misconduct:

Any student who is affected by sexual misconduct or harassment is notified of their right and option to report to law enforcement and/or seek immediate medical assistance. The notification of law authorities is entirely optional and can always be declined. If the student chooses to notify law enforcement, the student has the option of being assisted by campus authorities (including the GIF Director and GIF Assistant Director of Student Development) in notifying law enforcement. The University is committed to treating all individuals with dignity, care, and respect. A Complainant and a Respondent will both have equal access to support and counseling services through the University. If a student chooses not to utilize services within the University, there are a variety of external services available. The following table of resources is provided to guide students on their support options, both University and external, confidential and non-confidential. In most cases, emergency phone calls directed at CSPS (001-509-313-2222) will be routed to the Study Abroad staff member on call, who is trained to connect students with the appropriate offices or resources.

	University Resources & Support Options	Non-GU Resources & Support Options
Confidential	Gonzaga Spokane Health & Counseling Services Center 001-509-313-4052	Lutheran Community Services Northwest Sexual Assault Crisis Line 001-509-624-7273
	Sexual Misconduct, Intimate Partner Violence and Gender-Based Harassment Report Form www.gonzaga.edu/sexualmisconductform	Lutheran Community Services Northwest Advocate Call/Text 001-509-342-8564 GUadvocate@LCSNW.org
	Office of Mission and Ministry 001-509-313-4242 (Confidentiality limited to any priest serving as a sacramental confessor or any ordained religious serving in the sacred confidence role)	Local Ambulance 118 Santa Maria Nuova (Hospital) +39 055 69381
Non-Confidential	Gonzaga Spokane Campus Security & Public Safety Department 001-509-313-2222	Local Police Department 112/113
	Gonzaga Spokane Center for Cura Personalis 001-509-313-2227	Florence American Consulate 055-266-951
	Gonzaga Spokane Title IX Office 001-509-313-6910	
	Gonzaga Spokane Student Development Office 001-509-313-4100	
	Gonzaga Spokane Human Resources 001-509-313-5996	
	Gonzaga Spokane Student Financial Services 001-509-313-6582	
	GIF Director 39-334-798-2573	

Health and Safety:

The first priority for any individual who has been assaulted is to get to a safe place. An individual's physical well-being should be addressed as soon as possible, whether or not that individual wishes to make a report to the University or local law enforcement. The Pronto Soccorso (ER) at the Santa Maria Nuova can be used for emergencies. Medical providers in Florence can facilitate and provide:

1. Emergency or follow-up medical services. The medical exam has two goals: first, to treat the full extent of any injury of physical trauma and to consider the possibilities of sexually transmitted disease or pregnancy; and second, to properly collect and preserve evidence as part of a "rape kit"/sexual assault examination for potential criminal prosecution (provided only by a trained provider in a hospital). IMPORTANT: do not shower, bathe, douche, brush your teeth, drink or change your clothing, as you may be destroying evidence. This evidence may assist in proving that the criminal offense occurred or may be helpful in obtaining a protection order.
2. STD/HIV testing, pharmaceuticals to prevent contraction
3. Pregnancy testing, pharmaceuticals to prevent pregnancy

Additional Confidential Options:

The University recognizes that not every individual will be prepared to make a formal report to the University or to local law enforcement. Individuals seeking to talk to someone about an incident of sexual harassment or misconduct in a confidential manner without making a report to the University or triggering any investigation or action by the University or the police can:

1. Speak to a medical professional or counselor at University Health and Counseling Services over the phone.
2. Call LCS Northwest's SAFET Response Center, which is the local sexual assault crisis center and crime victim service center. LCS Northwest's services are completely confidential and they do not exchange information or forward information to the university. LCS Northwest community-based victim advocates have privileged communication outlined by RCW 5.60.060 (7)(b). They can offer confidential support and crisis intervention immediately after an event occurs, or months or years later. They will support survivors in making legal and medical decisions and inform them of their rights and options (on and off campus), and connect them to additional resources. LCS Northwest victim advocates are also trained and certified to provide psychoeducation on the effects of trauma. LCS Northwest victim advocates can also assist with Crime Victims Compensation which may pay for hospital visits, follow-up appointments, and counseling, among other expenses. Gonzaga University has retained the contract services of a community-based victim advocate from LCS Northwest to confidentially support survivors of sexual assault and other crimes, such as bullying, stalking, harassment, physical assault, hazing, etc. Advocates can assist in the search of medical care and other community resources as the student's request. The victims advocate can assist can also assist in issues related to visas and immigration. If students would like to discuss Title IX or reporting options, LCS Northwest community-based victim advocates are trained in the Title IX and the reporting process on and off campus. If the student chooses to report the incident, the advocate can provide confidential support before, during, and after the report, and throughout the on or off campus legal process.

It is important to note that talking with a victim advocate is not the same thing as making a report with the University. Community-based advocates are independent of the university and do not provide information disclosed to them to the University. LCS Northwest is also available 24/7 by calling Campus Security and Public Safety at 001-509-313-2222.

3. Speak to any Priest serving as a sacramental confessor or any ordained religious serving in the sacred confidence role. Ordained counselors are employed by the Office of Mission and Ministry.
4. Both anonymous and non-anonymous complaints can be submitted to the University by using the Sexual Misconduct, Intimate Partner Violence and Gender-Based Harassment Report Form at www.gonzaga.edu/sexualmisconductform. Anonymous reports or reports that do not include an identifiable complainant, respondent, specific date or date range, location or allegations of misconduct under the policy may limit the University's ability to respond.

About Non-Confidential Resources and Reporting Options:

The University encourages all Gonzaga community members to report information about any type of sexual misconduct or harassment of another person involving a current student, staff, or faculty member. An incident does not have to occur on campus to be reported to the University. Off campus conduct that adversely affects or has the potential to adversely affect the Gonzaga community also falls under this policy. The University will promptly investigate and respond to all reports of sexual misconduct and harassment.

When a student or employee reports that they have experienced sexual misconduct or harassment, the institution will provide a written explanation of their rights and options. The individuals will have the opportunity to ask questions, and will be provided written information with on- and off-campus resources concerning counseling, health, victim advocacy, legal assistance, and visa and immigration assistance. Information on how to access such services can be found on page 17. The University provides equal resources to both a Complainant and a Respondent in making decisions, obtaining information about their rights and options under this policy, and assisting either party in the event that a report of sexual misconduct or harassment is made.

A Complainant need not decide whether to request that the University pursue student conduct processes and/or sanctions at the time the report is made. Once the University is made aware of an incident, the option to request action within the Student Code of Conduct will remain open as long as the Complainant and the Respondent are students. If any party involved in a complaint is no longer affiliated with the University, the University will still seek to meet its Title IX obligation by taking steps to end the harassment, prevent its recurrence, and address its effects.

Under Washington State Law, the University must, within forty-eight hours of receiving a report of alleged sexual assault of a student under the age of 18, make a report or cause a report to be made to Child Protective Services or local law enforcement. The individual who made a report or about whom a report was made will be informed of this requirement by a Student Development professional staff member.

Non-Confidential University Reporting Options:

- 1.) To file an official complaint at the University regarding dating violence, domestic violence, sexual assault or stalking, the list of Title IX professional staff on pages 21-22 can be contacted via phone or email, or by emailing titleix@gonzaga.edu
- 2.) CSPS can be contacted 24/7 year-round over the phone at 001-509-313-2222. A Complainant can request that a CSPS Officer files an official report or request to speak with Lutheran Services. There is no requirement that the Complainant file a Security incident report in order to speak with Lutheran Services. CSPS can connect students to other services, in addition to initiating an official report.
- 3.) Complaints can be submitted to the University by using the Sexual Misconduct, Intimate Partner Violence and Gender-Based Harassment Report Form at www.gonzaga.edu/sexualmisconductform.
- 4.) Campus Partners at the Student Development Office (which includes Housing and Residence Life), the Center for Cura Personalis, and the Human Resources Department can all be contacted and can assist in initiating a formal complaint at the University level.

Reporting to Law Enforcement:

Community members have the option of filing an official report to the local police department in Florence. Notifying the police will generally result in the Complainant, and in some cases the Respondent, being contacted by a police officer. The police department determines if a criminal investigation will occur and if the case will be referred for prosecution. A case not referred for criminal prosecution will still receive a University response.

An act not criminally prosecuted may still violate University policy. To the extent permitted or required by law, the University will cooperate with outside investigators. However, outside law enforcement agencies do not respond to Title IX violations, and will only respond to allegations of criminal behavior. As a result, the University encourages reporting to both the University itself and to an outside law enforcement agency, if the alleged sexual misconduct may also be a crime.

The University process and the criminal justice process are two separate and independent courses of action. If a Complainant wishes to file a report with the police department, a Gonzaga Student Development professional staff member, or GIF staff member is available to assist. The University will not file a police report about an incident or on behalf of a student unless compelling circumstances exist. The University's response to a report is not impacted by the Complainant's decision to file a criminal complaint, or by the outcome of the criminal investigation.

INTRODUCTION TO UNIVERSITY POLICIES AND PROCEDURES

This section contains select excerpts from Gonzaga's Harassment & Discrimination Policy and the Student Code of Conduct. To read the Harassment & Discrimination Policy in its entirety, please refer to <https://www.gonzaga.edu/student-life/student-services/resolution-center/student-code-of-conduct/standards-of-conduct-and-policies/university-policies/harassment-and-discrimination-policy>. To read the Student Code of Conduct in its entirety, please refer to <https://www.gonzaga.edu/student-life/student-services/resolution-center/student-code-of-conduct>.

Gonzaga University recognizes the inherent dignity of all individuals and promotes respect for all people in its activities and programs and in the relationships it shares with students, faculty, staff, and the

public. Further, the University expects all community members to promote dignity and respect in their daily interactions with each other.

Sexual misconduct and harassment will not be tolerated at Gonzaga University. The University prohibits the crimes of dating violence, domestic violence, sexual assault, and stalking, as defined by the Clery Act. Such acts are counter to our mission, values, Student Code of Conduct, and University policy. Acts of sexual misconduct and harassment interfere with an individual's ability to benefit from the Gonzaga experience. The University is committed to taking all appropriate steps to eliminate sexual misconduct and harassment, prevent its recurrence, and address its effects.

The University seeks to cultivate a campus culture of prevention and awareness surrounding sexual misconduct and harassment and encourages all members of the Gonzaga community to report any incident of sexual misconduct or harassment. The University will take steps to resolve in a prompt, fair, and impartial manner from the initial investigation to the final result. We do this by providing counseling and support services for individuals and groups who have been affected by sexual misconduct or harassment, by investigating reports in a thorough and equitable manner, by holding students who violate this policy accountable through the Student Code of Conduct, and by providing education and training to the Gonzaga community.

It is a violation of University policy to threaten, intimidate, or retaliate in any way against an individual because he/ she raised allegations of sexual misconduct or harassment; participated in an investigation; complaint process or hearing; or filed a complaint alleging harassment. The University will take immediate and responsive action to any retaliation.

Role of the Title IX Coordinator:

The University has designated a Title IX Coordinator to oversee its response to all reports of sexual misconduct and harassment and coordinate compliance with the mandates of Title IX. The University's Title IX Coordinator is:

Stephanie Thomas, Title IX Director
102 E. Boone Avenue
509-313-6910
thomassn@gonzaga.edu

The Title IX Director is assisted by the following Deputy Title IX Coordinators:

Christine Purviance, Assistant Director
102 E. Boone Avenue
509-313-5858
purviance@gonzaga.edu

Matt Nelson, EEO Lead Investigator
502 E. Boone Avenue
2nd Floor Crosby
509-313-3998
nelsonm4@gonzaga.edu

Heather Gores, Associate Athletic Director
502 E. Boone Avenue
Martin Centre, PV315
509-313-3599
gores@athletics.gonzaga.edu

Eric Baldwin, Deputy Title IX Coordinator
502 E. Boone Avenue
College Hall 120
509-313-4135
baldwine@gonzaga.edu

The Title IX Director and Coordinators are knowledgeable and trained in the University's policies and procedures, state and federal laws that apply to matters of sexual misconduct and harassment, and the dynamics of sexual misconduct and harassment. All reports of misconduct will be investigated and managed by Title IX professional staff, or University Conduct Board members who have been trained annually on issues related to domestic violence, dating violence, sexual assault, stalking, and victimization, and on how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability. The Title IX Director and Coordinators are level one certified through ATIXA. University Board Conduct members receive annual training through the Title IX office regarding relevant evidence, procedural results for conducting a proceeding, and avoiding actual and perceived conflicts of interest. The Title IX Director and Coordinators are available to meet with any individual, either Complainant, Respondent, or third party, to discuss the options for resolution of a report under this policy.

Statement of Privacy and Confidentiality:

Gonzaga is committed to protecting the privacy and confidentiality of all individuals involved in a report of harassment or discrimination. Gonzaga will balance privacy and confidentiality with its obligation to conduct a thorough review of the allegation for the purpose of protecting the parties and the broader campus community and maintaining an environment which is free from harassment and discrimination.

- i. Privacy generally means information related to a report of misconduct will only be shared with a limited circle of individuals. The use of this information is limited to those Gonzaga employees who "need to know" in order to assist in the active review, investigation or resolution of the report. While not bound by confidentiality, these individuals are required to be discreet and respect the privacy of all individuals involved in the process.
- ii. Confidentiality means information shared by an individual with designated campus or community professionals cannot be revealed to any other individual without the express permission of the individual. These professionals include those licensed by the State as a medical professional, mental health clinician or clergy serving in their capacity as a sacramental confessor or any ordained religious professional serving in the sacred confidence role.

When Gonzaga has received a report of harassment or discrimination, but the Complainant requests his/her identity remain private or confidential, or that Gonzaga not pursue an investigation, Gonzaga must balance this request for privacy with its responsibility to provide a safe and non-discriminatory environment for all members of the Gonzaga community. Decisions regarding privacy requests will be made by the Title IX Coordinator for gender-based harassment, discrimination, and/or sexual misconduct. Decisions regarding privacy of all other equal opportunity complaints will be made by the appropriate Gonzaga officials. Gonzaga will take all reasonable steps to investigate and respond to the report consistent with the Complainant's request, but its ability to do so may be limited by the request for privacy. However, with the presence of circumstances (including without limitation the seriousness of the alleged harassment and the age of the parties) or evidence of a pattern of repetitive behavior, Gonzaga may conduct further investigation, or take other appropriate measures without the Complainant's consent. A Complainant will be informed whenever legally permissible of any action

taken by Gonzaga to resolve the complaint, including further investigation and corrective or disciplinary steps.

If circumstances alleged in a report of misconduct pose an immediate threat to the Gonzaga community or when timely notice must be given to protect the health or safety of the community, Gonzaga may not be able to maintain the same level of privacy. Immediately threatening circumstances include, but are not limited to, reported incidents of sexual misconduct which include the use of force, a weapon, or other circumstances which represent a serious and ongoing threat to Gonzaga students, faculty, administrators, staff, or visitors.

All resolution proceedings are conducted in compliance with the requirements of FERPA, the Clery Act, Title IX, and University policy. No information shall be released from such proceedings except as required or permitted by law and University policy. Publically available recordkeeping, including Clery Act reporting and disclosures, will be maintained and will not include personally identifying information, as defined in section 4002 (a)(20) of the Violence Against Women Act of 1994.

Definitions, Examples and Prohibited Conduct:

This policy addresses a broad spectrum of behavior, all of which falls under the definition of sexual harassment.

SEXUAL HARASSMENT

Sexual harassment is defined as any unwelcome sexual advance; request for sexual favors; or other verbal or physical conduct or communication of a sexual nature when:

1. Submission to such conduct is an explicit or implicit condition of employment or academic success; or
2. Submission to or rejection of such conduct is used as the basis for an employment or academic decision; or
3. Such conduct has the purpose or effect of –
 - a. interfering with an individual's work or academic performance; or
 - b. creating an intimidating or hostile working or academic environment.

Sexual harassment may include sexual misconduct and sexual violence. A single isolated incident of sexual harassment may create a hostile environment if the incident is sufficiently severe. The more severe the conduct, the less need there is to show a repetitive series of incidents to provide a hostile environment, particularly if the harassment is physical. Sexual misconduct and sexual violence can include, but is not limited to, sexual assault, domestic violence, dating violence, sexual exploitation, harassment, and stalking.

Sexual harassment also includes gender-based harassment, which may include acts of verbal, nonverbal, or physical aggression, intimidation, or hostility based on sex or sex-stereotyping, even if those acts do not involve conduct of a sexual nature.

Examples of behaviors which might be considered sexual harassment include, but are not limited to:

1. Demeaning sexist statements, humor or jokes about sex or gender-specific traits, crude sexual remarks, offensive stories, remarks of a sexual nature about a person's clothing or body, remarks about sexual activity or experiences, sexual innuendo or other suggestive comments, offensive notes, sexual propositions, or insults and threats, that an individual communicates are unwanted and unwelcome.

2. Display or circulation of written materials or pictures degrading to an individual(s) or gender group.
3. Inappropriate or unwelcome physical contact or suggestive body language, such as touching, patting, pinching, hugging, kissing, or brushing against an individual's body.
4. Undue and unwanted attention, such as repeated inappropriate flirting, compliments about clothing or physical attributes, staring, or making sexually oriented gestures.
5. Pressuring an individual to become involved in sexual activity.
6. Making a student's work or an employee's job more difficult because of that person's sex, gender identity, or sexual orientation.
7. Using a position of power and authority to:
 - a. threaten or punish, either directly or by implication, for refusing to tolerate harassment or submit to sexual activity, or for reporting harassment;
 - b. promise rewards in return for sexual favors.
8. Sexually assaulting an individual.
9. Engaging in demeaning verbal and other expressive behavior of a sexual or gendered nature in instructional settings.

Sexual misconduct and harassment can take many forms:

1. Sexual misconduct and harassment can occur between equals (e.g., student to student, employee to employee) or between persons of unequal power status (e.g., supervisor to subordinate, professor to student, coach to student-athlete).
2. Sexual misconduct and harassment can be committed by an individual or may be a result of the actions of an organization or group. It can be committed against an individual, an organization, or a group.
3. Sexual misconduct and harassment can be committed by an acquaintance, a stranger, or someone with whom the Complainant has an intimate or sexual relationship.
4. Sexual misconduct and harassment can occur by or against an individual of any gender. This policy prohibits sexual misconduct or harassment against Gonzaga community members of any gender, gender identity or sexual orientation.

SPECIFIC EXAMPLES OF PROHIBITED CONDUCT

The University expects all members of the Gonzaga community to conduct themselves in a manner consistent with the Student Code of Conduct, the Personnel Policies and Procedures Manual, and Faculty Handbook, for students, staff, and faculty respectively. In addition to the range of behaviors identified above as sexual harassment, the following conduct is specifically prohibited by this policy:

Sexual Assault:

Related to Attempted or Actual Penetrations — Having or attempting to have non-consensual vaginal, anal, or oral penetration, however slight, with any object or body part, with another person. This includes intercourse or attempted intercourse under circumstances including:

1. the use or threat of coercion or force;
2. when the other person is incapacitated and that incapacitation is reasonable apparent to the Respondent; *OR*
3. when the other person does not consent.

Related to All Other Forms of Sexual Contact — Having or attempting to have any non-consensual, non-accidental touching of a sexual nature. This touching can include, but is not limited to, kissing, touching the intimate parts of another, or causing the other to touch the harasser's intimate parts. This includes sexual contact under circumstances including:

1. the use or threat of coercion or force;
2. when the other person is incapacitated and that incapacitation is reasonably apparent to the Respondent; *OR*
3. when the other person does not consent.

Sexual Based Communication:

Speaking to, or directing any kind of communication, words, or images of a sexual nature at another person that is not welcomed by the receiving party. If the communication is unwelcome, that is, if it occurs without the other person's consent or participation it may create a hostile learning and living environment. Sexual-based communication can include interactions in person, by phone, electronic messages and photos, written words or images such as graffiti, and social media postings.

Sexual Exploitation:

Taking sexual advantage of another for the Respondent's advantage or benefit, or for the benefit or advantage of anyone other than the Complainant, and that behavior does not otherwise constitute other forms of sexual misconduct or harassment described in this policy. Examples of sexual exploitation include creating images (including video or still photography) of another person of a sexual nature via web-cam, camera, Internet exposure, etc., without knowledge and consent of all persons; knowingly exposing a person who has not consented to the risk to HIV or any other Sexually Transmitted Disease (STD); inducing incapacitation for the purpose of making the other person vulnerable to sexual assault; and, voyeurism.

Stalking:

A pattern of repeated and unwanted attention, harassment (as defined in this policy), contact, or any other course of conduct directed at a specific person that would cause a reasonable person to become alarmed or be in fear of harm or injury, including physical, emotional, or psychological harm. This includes cyber-stalking, a particular form of stalking in which electronic media such as the internet, social networks, blogs, cell phones, texts or other similar devices or forms of contact are used to pursue, harass or make unwelcome contact with another person.

Domestic Violence:

A situation in which one partner in a domestic relationship is physically, emotionally, or sexually abused by the other partner. Domestic violence can occur between individuals who are married, who reside together, who share a child, or who are separated following a domestic relationship. Domestic violence can occur between individuals of the same or opposite sex.

Dating Violence:

A situation in which one partner in a dating relationship is physically, emotionally, or sexually abused by the other partner. A dating relationship means a social relationship of a romantic or sexual nature. Dating violence can occur between individuals who are separated following a dating relationship. Dating violence can occur between individuals of the same or opposite sex.

Retaliation:

Acts or attempts to seek retribution including, but not limited to, any form of intimidation, reprisal, harassment or intent to prevent participation in University proceedings under this policy. Retaliation may include continued abuse or violence, other harassment, and slander, and libel.

DEFINITIONS OF CONSENT, COERCION & INCAPITATION

Consent:

Consent occurs when the parties exchange affirmative words or behavior indicating their agreement to freely participate in mutual sexual activity. Consent must be informed, knowing and voluntary, and freely and actively given. As a general rule, a person will be considered unable to give valid consent if she/he cannot appreciate the “who, what, when, where, why and how” of a sexual interaction. The following further clarifies the definition of consent:

1. Each participant in a sexual encounter is expected to obtain and give consent to each act of sexual activity.
2. If at any time it is reasonably apparent that either party is hesitant, confused or unsure, both parties should stop and obtain mutual consent before continuing such activity.
3. Consent may be withdrawn by either party at any time. Withdrawal of consent must also be outwardly demonstrated by words or actions that clearly indicate a desire to end sexual activity. Once withdrawal of consent has been expressed, sexual activity must cease.
4. Relying on non-verbal communication can lead to misunderstandings. Consent should not be inferred from silence, passivity, lack of resistance, or lack of an active response alone. A person who does not physically resist or verbally refuse sexual activity is not necessarily giving consent.
5. Individuals with a previous or current intimate relationship do not automatically give either initial or continued consent to sexual activity.
6. An individual who is physically incapacitated from alcohol or other drug consumption (voluntarily or involuntarily), or is unconscious, unaware, or otherwise physically helpless is considered unable to give consent. For example, one who is asleep or passed out cannot give consent.
7. An alcoholic in a blackout state may appear to act normally but may not have later recall of the events in question. The extent to which a person in this state affirmatively gives words or actions indicating a willingness to engage in sexual activity, and the other person is unaware – or reasonably could not have known – of the alcohol consumption or blackout, must be evaluated in determining whether consent could be considered as having been given.
8. Alcohol and other drugs impair a person’s decision-making capacity, awareness of the consequences and ability to make judgments, and can create an atmosphere of confusion over whether consent has been freely and clearly sought or given.
9. Being intoxicated or impaired by drugs or alcohol is never an excuse for sexual misconduct or harassment and does not diminish one’s responsibility to obtain consent.

Coercion:

The use, attempted use, or threat of force, immediate or future harm, or the use of physical, severe and/or pervasive emotional intimidation to cause another person to engage in or submit to certain activities. Coercion also includes administering a drug, intoxicant, or similar substance that impairs the person’s ability to give consent.

Incapacitation:

An individual who is incapacitated cannot consent to sexual activity. An individual is incapacitated if he/she is physically helpless, unconscious, or unaware, due to drug or alcohol consumption (voluntarily or involuntarily) or for some other reason. Where alcohol is involved, incapacitation is a state beyond drunkenness or intoxication. Some indicators of incapacitation may include, but are not limited to, lack of control over physical movements; being unaware of circumstances or surroundings; or being unable to communicate for any reason.

Definitions Under Italian Law:

Acts of sexual assault, dating violence, domestic violence and stalking occurring within the context of interpersonal relationships may be criminal offenses under Italian Law.

Sexual Assault:

Under Italian law, the definitions of sexual assault and rape overlap and do not differ from region to region. Italian law regards all forms of sexual assault, including date rape, spousal rape, and rape of males, as serious violent crimes. Rape/sexual assault is defined as the act of forcing someone to perform or experience sexual acts by using violence, under threat of injury, or by abusing her/his authority.

Dating violence:

Based on good faith research, there is no specific definition or prohibition of “dating violence” under Italian law.

Domestic violence:

Based on good faith research, domestic violence is not specifically addressed in Italian law. Instead, it is considered an aggravating factor in general crimes of violence, such as assault.

Stalking:

Based on good faith research, the College is not aware of any Italian law that defines or prohibits stalking.

Consent:

Based on good-faith research, the College has determined that consent (as it relates to sexual activity) is not defined under Italian law.

Interim Measures to Protect Safety and Well-Being:

After a report is made, the University will provide written notification to students and employees about existing services available, both on campus and in the community, as well as information about options for academic, living, transportation, and employment changes, or other protective measures. The University will provide interim support and reasonable protection against further acts of misconduct, harassment, or retaliation as needed, and will provide services and resources to provide a safe environment. For a listing of services and resources see the Campus and Community Resources section of this policy on page 17. The University will determine the necessity and scope of any interim measures pending the completion of the complaint process. All individuals are encouraged to report concerns about failure of another individual to abide by any restrictions imposed by an interim measure. The University will take immediate and responsive action to enforce a previously implemented interim measure. Interim measures are not appealable. The University will maintain as confidential any accommodations or protective measures provided to the Complainant and Respondent, to the extent

that maintaining confidentiality will not impair the ability of the institution to provide accommodations or protective measures. The range of interim measures includes:

Contact and Communication Directives:

The Complainant or Respondent may request, or the University may impose, even if not requested, communication and contact restrictions to prevent further potentially harmful interaction. A Complainant or Respondent may request a change in an academic or living situation after a report of sexual misconduct or harassment. Any such request shall be made to the Student Development professional staff member assigned to her/his case. Upon request the Student Development professional assigned to the case will inform the Complainant or Respondent of options and will endeavor to accommodate the requested changes if they are reasonably available.

In some cases, an individual may wish to consider a protection/anti-harassment order issued by the appropriate court of the State of Washington. This is a civil proceeding independent of the University. If a court order is issued the University will, to the extent possible, assist the protected person in benefitting from the restrictions imposed by the court and will also facilitate on campus compliance with the order. The court enforces the order through law enforcement. The University does not enforce the order but does enforce its own rules. It is important to note that a civil “no contact” order could prevent the University from conducting a hearing in which students subject to the order are entitled to be present and provide information. A student can return to the court to request modification of the order for the purpose of facilitating attendance at a University hearing.

Academic, Employment, or Living Arrangements:

A Complainant or Respondent may request, or the University may impose, even if not requested, a change in academic, employment, or living situation after a report of sexual misconduct or harassment. Upon request the Title IX Coordinator will inform the Complainant or Respondent of the options and is obligated to accommodate the requested changes if they are reasonably available. The Title IX Coordinator will work with various offices on campus, including Housing and Residence Life and the Center for Cura Personalis, to determine and facilitate appropriate accommodations. Interim changes may include:

1. Changing class or work schedule, including the ability to stop a course without penalty;
2. Limiting an individual’s or organization’s access to certain University facilities or activities pending resolution of the matter;
3. Obtaining a Voluntary Leave of Absence;
4. Providing an escort to ensure safe movement between classes and activities;
5. Providing academic support services; and
6. Any other remedy which can be tailored to the involved parties to achieve the goals of this policy.

Emotional Support:

The University will assist in providing counseling services through the Health and Counseling Services Center or will assist in providing a referral to off campus agencies as detailed in the Campus and Community Resources section of this policy. Counseling and emotional support is available to any University member.

PROCEDURES FOR THE RESOLUTION OF SEXUAL MISCONDUCT AND HARASSMENT REPORTS UNDER THE STUDENT CODE OF CONDUCT

Overview of Options:

The University is committed to providing all students with a safe environment in which to live and learn. Consistent with this goal, the University will respond promptly and equitably when any incident of sexual misconduct or harassment is alleged against a student or the University becomes aware of the situation by other reliable means. The first priority is to offer support and services to members of the Gonzaga community. The University's response may take a number of forms within its discretion. Potential responses include: offering reasonable protection and services to the Complainant or others; conducting a Title IX inquiry or review; conducting an investigation; contacting the Respondent; imposing corrective or restrictive measures; and/or conducting a hearing pursuant to the Student Code of Conduct.

The Student Development Office, working in conjunction with the Title IX Office, administers the process of receiving, responding to and resolving reports when students are involved. If a report involves a student and a staff or faculty member, the Student Development Office will work cooperatively with the University's Equal Opportunity Officer and Human Resources. This policy is consistent with the University's overall harassment and discrimination policies.

Review and Investigation:

The University will review and respond to all reports of sexual discrimination, misconduct, and harassment. In every case, the University will make an immediate assessment of any risk of harm to individuals or the campus community and will take appropriate steps to address any risks. Following this initial review, the University may take steps to investigate or otherwise determine what occurred. The University will take all reasonable steps to investigate and respond to the report consistent with the Complainant's request; however, circumstances may exist when the University chooses to move forward with an investigation and/or resolution under either the student conduct or employee disciplinary system, or take other appropriate measures without the Complainant's consent. The University will investigate the report in a thorough and equitable manner to all parties involved. These investigative steps may include interim measures intended to provide for the safety of individuals and the campus community. The University's overarching goal is to end any misconduct, to prevent its recurrence, and to address its effects.

Generally speaking, the University will complete the investigation and resolution of all reports within 60 calendar days of receiving a report. Parties will be notified in writing of the final outcome within ten calendar days of the hearing or other action which concludes the report process.

Title IX Inquiry:

In every report of sexual harassment or misconduct, the Title IX Coordinator will review the report; provide investigative steps; and will endeavor to ensure that all appropriate remedies have been considered and implemented as needed.

A Complainant is encouraged, but never pressured, to participate in the University's investigation and conduct process so that the facts of each report can be explored and responsible parties held accountable for their misconduct, if warranted. If a Complainant chooses not to participate in a full investigation and/or student conduct hearing, the University will still undertake a Title IX inquiry to review the report and seek to reach a resolution that will eliminate any harassment, prevent its recurrence, and address its effects.

Student Code of Conduct Reports:

Reports of student to student or student to faculty/staff sexual misconduct or harassment will be adjudicated under the Student Code of Conduct.

After a Complainant has submitted a report alleging misconduct, a trained staff member from Student Development will meet with the Complainant. The purpose of meeting is to assure that all University services and resources are made available to the Complainant. The Respondent will also be afforded the opportunity to meet with a Student Development staff person for the same general purposes.

In all cases, the Title IX Coordinator will assess the processes utilized and the resulting resolutions for the purpose of determining whether there are additional remedial measures, support mechanisms or educational efforts that would further the goals of eliminating harassment, preventing its recurrence, and addressing its effects.

University Conduct Board Hearings:

Complainant participation in hearings related to alleged violations of Gender-based Harassment, Discrimination, and Sexual Misconduct, or alleged crimes of violence:

1. Complainants have an identical right to be present at and to participate in all hearing processes as outlined in Hearing Procedures.
2. The panel chair may allow the contesting parties to be screened from the vision of one another during the hearing, may make arrangements for attendance by video conference, or make other appropriate accommodations, all within their sound discretion.
3. The Complainant will have the opportunity to present any relevant information in the case against the accused party. This information may be presented by the introduction of any available and relevant documents, physical evidence or through the in-person testimony of witnesses. The panel chair, the Respondent and the UCB members may direct reasonable questions to witnesses presented by the Complainant.
4. The Complainant and the Respondent may not directly question one another unless granted permission to do so by the panel chair. If a request to allow direct questioning between the parties is made, the panel chair shall enter into the record a written finding in support of their decision. If a request to allow direct questioning is denied, the chair, at their discretion, may allow the parties to pose additional questions or inquire further into specific matters by submitting these questions/requests in writing to the chair. The chair may then, at their discretion, pose the submitted questions to the other party. If necessary, a brief break may be granted to allow both parties an opportunity to prepare and submit such questions/requests. The chair is empowered to disallow or reframe any questions that are irrelevant, redundant, or otherwise inadmissible.
5. In matters alleging a violation of the University's Harassment and Discrimination Policy no information facts or evidence bearing upon the prior sexual conduct of a party shall be introduced into a hearing process absent permission to do so granted by the hearing panel chair. Where a Respondent and Complainant have a prior intimate or sexual relationship this information may be relevant to determine responsibility, however, the mere fact of a current or previous consensual intimate or sexual relationship between the two parties does not itself imply consent or preclude a finding of responsibility for sexual misconduct. Any prior sexual conduct of the Complainant unrelated to the Respondent is not relevant and shall not be considered. The prior unrelated sexual misconduct of the Respondent may be relevant to the issue of appropriateness of sanction.
6. Complainants will also be simultaneously notified in writing of the outcome of the case. Notification will be made in compliance with privacy laws, including but not limited to FERPA. Notification shall include information regarding how an appeal may be filed. Following an appeal, the Complainant and Respondent will also receive simultaneous notification of any change to the result of a proceeding and when such results become final.

Upon written request, the university will disclose to the Complainant of a crime of violence or non-forcible sex offense the report on the results of a university disciplinary proceeding against the

Respondent. If the Complainant is deceased as a result of such crime or offense, the next of kin of such Complainant will be treated as the Complainant if so requested.

PROCEDURES FOR THE RESOLUTION OF SEXUAL MISCONDUCT AND HARASSMENT REPORTS FOR FACULTY AND STAFF UNDER THE GONZAGA UNIVERSITY POLICIES AND PROCEDURES MANUAL

This section contains select excerpts from the Gonzaga University Policies and Procedures Manual, referencing the disciplinary procedures for faculty and staff as related to cases of alleged dating violence, domestic violence, sexual assault or stalking. To read the manual in its entirety, please refer to <https://my.gonzaga.edu/faculty-staff-services/human-resources/policies-and-handbooks>.

Reporting:

While certain community members are mandatory reporters, Gonzaga encourages all community members to report information about any type of gender-based harassment, discrimination, and/or sexual misconduct involving students, staff or faculty members. An incident does not have to occur on campus to be reported. Off campus conduct which adversely affects or has the potential to adversely affect the Gonzaga community also falls under this policy. Gonzaga will promptly investigate and respond to all reports of sexual misconduct, harassment and discrimination.

Gonzaga provides resources to both Complainants and Respondents in making decisions, obtaining information about their options under this policy and assisting either party in the event that a report of gender-based harassment, discrimination, and/or sexual misconduct is made.

A Complainant need not immediately request an investigation or disciplinary actions at the time the report is made. Once Gonzaga is made aware of an incident, the option to request action will remain open as long as the Complainant and/or Respondent are current students, staff, faculty or are otherwise subject to this policy. If any party involved in a complaint is no longer affiliated with Gonzaga, Gonzaga will still seek to meet its Title IX obligation by taking steps to end the harassment, prevent its recurrence and address its effects.

Under Washington State Law, Gonzaga must, within forty-eight hours of receiving a report of alleged sexual assault of an individual under the age of eighteen (18), make a report or cause a report to be made to Child Protective Services or local law enforcement. An appropriate Gonzaga professional will notify the reporting party of Gonzaga's mandatory reporter requirements.

Coordination with Law Enforcement:

Notifying Law Enforcement may result in the Reporting Party, Complainant and/or Respondent being contacted by a police officer. The police department determines if a criminal investigation will occur and if the case will be referred for prosecution. A case not referred for criminal prosecution may receive a Gonzaga response.

An act not criminally prosecuted may violate Gonzaga policy. To the extent permitted or required by law, Gonzaga will cooperate with outside investigators. Gonzaga encourages reporting to both Gonzaga and to an outside law enforcement agency, if the alleged gender-based harassment, discrimination, and/or sexual misconduct may also be a crime.

Gonzaga process and the criminal justice process are two separate and independent courses of action. If an individual wants to file a report with Law Enforcement, a Gonzaga professional staff member is available to assist. Gonzaga generally will not file a police report on behalf of an individual, unless circumstances warrant. Gonzaga's response to a report is not impacted by the filing of a criminal complaint or by the outcome of the criminal investigation.

Amnesty:

It is Gonzaga's goal that all individuals report all incidents of sexual misconduct so that those affected can receive the support and resources needed. Therefore, violations of Gonzaga's alcohol and drug policies by a Reporting Party or a Complainant may be exempt from disciplinary action in situations where gender based harassment, discrimination, and/or sexual misconduct also occurs. However, Gonzaga may initiate an educational discussion about the use of alcohol or drugs and their impact.

False Reports:

Submission of a complaint, concern or report of harassment will not affect the Reporting Party's or Complainant's employment, grades, academic standing or work assignments.

Interim Measures:

After a report is made, Gonzaga will provide interim support and reasonable protection against further acts of misconduct, harassment or retaliation as needed, and will provide services and resources to provide a safe environment. For a listing of services and resources see the Campus Resources section of this policy.

Gonzaga will determine the necessity and scope of any interim measures pending the completion of the complaint process. All individuals are encouraged to report concerns about failure of another individual to abide by any restrictions imposed by an interim measure. Gonzaga will take immediate and responsive action to enforce a previously implemented interim measure. Interim measures are not appealable.

The range of interim measures includes:

- **Contact/Communication Directives:** The Complainant or Respondent may request, or Gonzaga may impose, even if not requested, communication and contact restrictions to prevent further potentially harmful interaction. Any such request shall be made to the investigator. Upon request the investigator assigned to the case will inform the Reporting Party or Respondent of options and will endeavor to accommodate the requested changes if they are reasonably available. In some cases, an individual may wish to consider a protection/anti-harassment order issued by the appropriate court of the State of Washington. This is a civil proceeding independent of Gonzaga. If a court order is issued Gonzaga will, to the extent possible, assist the protected person in benefitting from the restrictions imposed by the court and will also facilitate on-campus compliance with the order. The court enforces the order through law enforcement. Gonzaga does not enforce the order but does enforce its own rules.
- **Academic, Employment or Living Arrangements:** A Complainant or Respondent may request, or Gonzaga may impose, even if not requested, a change in academic, employment or living situation after a report of sexual misconduct, harassment or discrimination. Upon request Gonzaga will

inform the Complainant or Respondent of the options and will endeavor to accommodate the requested changes if they are reasonably available. Interim changes may include:

- Class or work schedule changes
 - Limiting access to certain Gonzaga facilities or activities
 - Leave of Absence
 - Campus Security escorts across campus
 - Academic support services
 - Other remedies which can be tailored to the involved parties to achieve the goals of this policy
- Emotional Support: Gonzaga provides counseling services through the Health and Counseling Center for students, or the Employee Assistance Plan (EAP) for staff and faculty. These resources also provide referrals to off campus agencies.

PROCEDURES FOR RESOLUTION OF GENDER-BASED HARASSMENT, DISCRIMINATION, AND SEXUAL MISCONDUCT

Overview of Potential Resolution Outcomes:

Gonzaga is committed to providing all students, staff, and faculty with a safe environment in which to live, learn and work. Consistent with this goal, Gonzaga will respond promptly and equitably when any incident of gender-based harassment, discrimination, and/or sexual misconduct is alleged against an individual or Gonzaga becomes aware of the situation by other reliable means. The first priority is to offer support and services to members of the Gonzaga community. Gonzaga's response may take a number of forms within its discretion. Potential responses include offering reasonable protection and services to involved parties, conducting a Title IX inquiry or review, conducting an investigation, imposing corrective or restrictive measures (including any student conduct outcome up to suspension or expulsion or employee remediation including termination) and conducting resolution processes.

Review and Investigation:

Gonzaga will review and respond to all reports of sexual discrimination, misconduct, harassment, and discrimination. In every case, Gonzaga will make an immediate assessment of any risk of harm to individuals or the campus community and will take appropriate steps to address. Following this initial review, Gonzaga may take steps to investigate or otherwise determine what occurred. Gonzaga will take all reasonable steps to investigate and respond to the report consistent with the Complainant's request; however, circumstances may exist when Gonzaga chooses to move forward with an investigation or resolution or take other appropriate measures without the Complainant's consent. Gonzaga will investigate the report in a thorough, equitable, and expeditious manner. These investigative steps may include interim measures intended to provide for the safety of individuals and the campus community. Gonzaga's overarching goal is to end any misconduct, to prevent its recurrence, and to address its effects. Generally speaking, Gonzaga will attempt to complete the investigation and resolution of all reports within 60 calendar days of receiving a report.

Resolution of Complaints:

- 1.) Student Development has staff designated for resolving student-to-student complaints as well as complaints of harassment or discrimination against a student by an unknown party. Reports where a student is the Respondent will be resolved under the Student Code of Conduct.

- 2.) The Equity and Inclusion Office or academic administration is responsible for resolving complaints against a faculty/staff member. Reports where a staff member is the Respondent will be resolved under Gonzaga University Policies and Procedures Manual. Reports where a faculty member is the Respondent will be resolved under the Faculty Handbook.

Complaints of harassment or discrimination involving both a student and a faculty/staff member are jointly handled by Student Development, the Office of Equity and Inclusion and by appropriate officials within the academic administration.

Parties will be notified in writing of the final outcome of the hearing or other action which concludes the report process.

ADDITIONAL UNIVERSITY POLICIES AND PROCEDURES

Missing or Absent Student Policy

As adults, Gonzaga University students have the right to come and go as they please and to choose to let others know if they will be gone from campus. In virtually all cases of unexpected absence reported by friends or acquaintances the student returns or contacts someone within a short time. There may be cases when an unexpected absence is more serious and there is a concern the student is missing and his/ her safety is at risk.

Gonzaga University defines a "Missing Student" as "a person absent contrary to his/her usual pattern of behavior and unusual circumstances may have caused the absence, or known facts indicate his/her safety may be at risk. Such factors could include, but are not limited to: a report or suspicion of foul play; suicidal or self-destructive comments or behavior; alcohol or drug dependency; or association with persons who may endanger the student's welfare."

A report of a student being absent or missing under unusual or unexplained circumstances must be immediately directed to the CSPA Communications Center, 001-509-313-2222. This office is staffed 24 hours a day, 365 days a year. In addition, reports of missing persons must be made to one of the following:

Jason Houston, Ph.D.,
Director, Gonzaga-In-Florence
Room 116
Cell +39 334 798 2573
Houston@gonzaga.edu

Frederica Dionisio
Assistant Director, Student Development
Room 203
Cell +39 340 162 1805
Dionisio@gonzaga.edu

Richard Menard
Director, Center for Global Engagement
323 E. Boone Ave Spokane, WA
001-509-313-3583
menardr@gonzaga.edu

Anyone receiving a missing student report must immediately bring it to the attention of one of the individuals listed above.

If the University is advised of the unusual or unexpected absence of a student, reasonable steps will be taken to gather information in order to locate the student or establish his or her well-being. The GIF Director is responsible for conducting an inquiry and making a determination the student is “missing.” As part of an inquiry, instructors, advisors, parents, friends, law enforcement officials, and others may be contacted. In addition, social media sites such as Facebook, Twitter, etc. may be accessed and activity on University-issued email accounts may be checked.

The Clery Act contains provisions specifically related to missing or absent students who reside in University residential facilities, which include contracted pensioni. The following policy and procedures apply only to those students.

Any student living in a University-owned, leased, managed, or operated residential facility may list a confidential contact person or persons to whom the University will notify within 24 hours of a determination by the GIF Director’s determination that the student is missing. Students who choose to live in a university designated pensione will be provided the option to elect a confidential contact specific to missing person scenarios prior to the beginning of the semester. The confidential contact information will be maintained jointly by GIF Administration and the Center for Global Engagement. This information is confidentially maintained, will be accessible only to authorized campus officials and will not be disclosed except to law enforcement personnel as part of a missing person’s investigation.

If a student is under 18 years of age and not emancipated (legally independent of his/her parents/guardians), the University will notify the student’s custodial parent or guardian in addition to any confidential contact person listed by the student.

Regardless of whether a residential student lists a confidential contact person, is above the age of 18 years, or is an emancipated minor, the GIF Director will inform the local law enforcement within 24 hours of the determination that a student is missing. When this occurs, the local law enforcement will become the lead agency on the investigation. The GIF will assist with continued inquiry within the campus community.

Nothing in this policy restricts Gonzaga University from making notifications earlier than noted above if deemed appropriate under the circumstances. Nor does this policy restrict Gonzaga University from contacting other individuals if deemed necessary to prevent harm to a student or others, necessary to the inquiry or investigation, or otherwise appropriate under the circumstances.

GIF DRUG POLICY

The illegal use of drugs at Gonzaga-In-Florence is not tolerated. This includes the abuse and medically unsupervised use of prescription drugs. Disciplinary action will be taken against any student who is involved in such use of drugs. Students are Italian laws on the possession, use and sale of illegal drugs, not those of the United States, but are still subject to the GU Code of Conduct. Documented violations of illegal possession, consumption, provision, or sale of narcotics or drugs, or possession of paraphernalia, may result in disciplinary sanction from the University (including potential expulsion from the program) and/or referral to law enforcement officials.

ALCOHOL IN FLORENCE

Many students studying in Florence may find they can legally drink in bars, pubs and restaurants for the first time. GU advises students to be especially careful if they should decide to go out for a night of drinking. GU promotes responsible decision making; if students choose to drink while in Florence they must do so legally and responsibly. If they do not, they could face university sanctions including probation and expulsion from the program. These policies and rules reflect not only respect for the community of Florence, but a concern for the health and safety of the campus community and apply to university faculty, students, staff, visitors, and guests.

Listed below are Italian laws regarding the consumption of alcohol and the possible consequences of violations:

- Article 689 of the Italian Criminal Code states that sale and distribution of alcoholic drinks and beverages by the manager of a bar/cafe/terea or food and beverage shop, in a public place or in place open to the public, is prohibited to individuals under 18-years-old and those who are mentally ill or have a clear mental deficiency caused by any other illness
- Article 688 of the Italian Criminal Code prohibits, in a public place or in a place open to the public, clear drunkenness that could cause a danger to society at large
- Article 690 of the Italian Criminal Code prohibits, in a public place or in a place open to the public, the serving of alcoholic beverages to an individual that cause the individual to become intoxicated. Article 690 also prohibits, in a public place or in a place open to the public, the serving of alcoholic beverages to an individual who is already clearly intoxicated

Students are subject to the laws listed above, not those of the United States, but are still subject to the GU Code of Conduct. Students found in violation of local liquor laws will also be referred to the student conduct process by way of Spokane Campus Resolution Center for Student Conduct and Conflict. Violations of these expectations may result in sanctions from the Resolution Center for Student Conduct and Conflict, in addition to potential expulsion from the program.

FIRE STATISTICS AND SAFETY EDUCATION

The Campus Fire Safety Right-to-Know Act of 2007 defines a fire as “Any instance of open flame or other burning in a place not intended to contain the burning or in an uncontrolled manner.” The act requires colleges and universities with student housing to disclose certain statistics, policies and information. Included in the requirements is a daily fire log. This log contains the following information about each reported fire on campus: nature of the fire, date and time the fire occurred, and the general location of the fire. The log is available for viewing online at <https://www.gonzaga.edu/gonzaga-in-florence/about-us/daily-crime-log>.

Fires are further categorized in this report by cause: Unintentional (cooking, smoking materials, open flames, electrical, heating equipment, hazardous products, machinery/industrial, natural and other); Intentional (arson); and Undetermined. The required statistics to be reported on an annual basis are: number of fires and cause of each fire; number of deaths related to a fire; number of injuries related to a fire that resulted in treatment at a medical facility; and the value of property damage related to the fire.

Reporting Fires and Fire Safety Concerns:

Fires should be reported to the local fire department at 115 and to the GIF Director at the time they occur. Reports of fires after the fact should be called in to CSPS for addition to the fire log. In addition, reports of fires after the fact and fire safety concerns may also be made to the Student Development Contacts listed on page 5.

Fire Alarms, Evacuation, Fire Safety Devices, and Flammable Materials:

Fire evacuation drills are not held in the pensioni. Occupants of the pensioni can request specific programming for that living unit from GIF administrators, in addition to the general fire safety material provided them.

When a fire alarm sounds or a resident becomes aware of a fire in a building the occupants of that building must immediately evacuate. Entering or re-entering a building in which a fire alarm is sounding is prohibited unless authorized by a fire department official. Tampering with, or the unauthorized use of fire safety equipment such as extinguishers, smoke and heat detectors, alarm pull stations, signage or emergency exits is prohibited. This includes activation of a false fire alarm and tampering with any equipment or fixtures used for the purpose of fire, health, or building safety.

The use of equipment that produces, contains, or conducts a continuous open flame—such as candles, potpourri burners, incense, sterno cans, or other combustibles—is prohibited within the pensioni. Examples of flammable items or materials which are specifically prohibited from any University property include, but are not limited to: gasoline containers (full or empty); gas-operated camping equipment (e.g., Coleman stoves); engines or engine parts; propane tanks; and liquid oxygen containers. Other examples of commonly utilized flammable materials that are considered dangerous and therefore prohibited include: chemical compounds and components, open-coil burners; open-coil space heaters; and candles. In addition, natural Christmas trees are prohibited.

Smoking of any kind is prohibited inside the pensioni, including stairwells and balconies. Evidence of smoking, including presence of residual odor, will be responded to as a violation of this policy. Improvements in the systems may be made by the University or pensioni owners in the future as determined by need. Fire safety systems are upgraded and replaced as necessary, there are no current plans for improvement.

Fire Systems:

Building	Smoke Detectors (Central)	Audible Alarm System	Smoke Detectors (Battery)	Fire Extinguishers	Pull Stations	Sprinkler System
85 Cavour (Via Cavour, 85)	X	X		X		
Hotel Cordova (Via Cavour, 96)	X	X				
Hotel Nazionale/Holiday Rooms (Via Nazionale, 22)				X		
Max and Silvia's Student House (Via G. La Pira, 17)			X	X		
Residenza degli Artisti (Via Calzaiuoli, 2)						

Fire Statistics:

Building	Total Fires in Building	Fire Number	Cause of Fire	Injuries	Deaths	Property Damage Value
85 Cavour (Via Cavour, 85)	0	0	0	0	0	0
Hotel Cordova (Via Cavour, 96)	0	0	0	0	0	0
Hotel Nazionale/Holiday Rooms (Via Nazionale, 22)	0	0	0	0	0	0
Max and Silvia's Student House (Via G. La Pira, 17)	0	0	0	0	0	0
Residenza degli Artisti (Via Calzaiuoli, 2)	0	0	0	0	0	0