Title: Campus Violence Prevention Policy

Written by: Director Student Services and External Relations

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Approved by:

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PURPOSE

The safety and security of the Trinity College of Nursing & Health Sciences ("Trinity" and/or "College") campus and community are very important. Students, employees, and visitors should be able to pursue their education, work, and other activities in a safe, non-threatening environment. College safety and security is based on the ability to set forth guidelines and have a plan with response options in the event of an act of campus violence. Safety and prevention of violence is everyone's responsibility. Trinity College of Nursing & Health Sciences complies with the Higher Education Opportunity Act, which includes Campus Safety and Security (PL 110-315).

DEFINITIONS

Violence: Violence is the use of physical force or activity that causes harm, damage, including domestic violence, dating violence, sexual assault or abuse of an individual or property. This includes physical force and/or activity which cause mental anguish. An act of campus violence constitutes an emergency and may involve one or more persons engaging dangerous and or deadly weapons. This type of incident can last for minutes or hours, range over a large and constantly changing area, and threaten everyone within close proximity of the aggressor(s). Students and staff may or may not receive advance warning of an act of campus violence. A witness, personal observation, or the sound of weapons discharging may be the only alert received, leaving little time to react.

Threat or Threatening Behavior: A threat is any statement or action, expressed or implied, that could cause a reasonable person to fear for the safety of him/herself, that of another person, and/or for College property. Examples of threats include, but are not limited to words or actions which intimidate; harassment; stalking or following someone with the intent to harass, intimidate, harm, or cause other malicious activity; and the use of communication mediums to threaten such as telephone, fax, electronic, or conventional mail.
**Weapons:** Weapons are not permitted on College-controlled property except for purposes of law enforcement and as specially authorized for the purposes of instruction, research, or service and as approved in writing by the Chancellor. To ensure compliance with Illinois Firearm Concealed Carry Act (430 ILCS 66/1) entrances to campus property and facilities are clearly posted to notify people that the College is a prohibited area. Under Illinois’ law, property owned or leased by a private college is a “prohibited area” where concealed carry is not allowed, except those people with a valid concealed carry permit who can keep their firearms locked in their personal vehicles.

Prohibited weapons include, but are not limited to any: (1) firearm, firearm ammunition, BB gun, pellet gun, paintball gun, tear gas gun, taser, or other dangerous or deadly device of similar type; (2) knife with a blade of at least 3 inches in length (except ordinary eating utensil), dagger, dirk, switchblade, knife, stiletto, ax, hatchet, or other deadly or dangerous weapon or instrument of similar type; (3) bludgeon, blackjack, slingshot, sandbag, sand club, metal knuckles, billy club, throwing star, nunchaku, or other dangerous or deadly weapon of similar type; (4) bomb, bombshell, grenade, firework, bottle or other container containing an explosive, toxic or noxious substance, unless under academic/classroom supervision, (other than an object containing a nonlethal noxious liquid, gas, or substance designed solely for personal defense possessed by a person 18 years of age or older); (5) souvenir weapon or other weapon that has been rendered permanently inoperative; and any weapons outlined in the Illinois Compiled Statutes on Armed Violence (720ILCS 5/33 A-l, et seq.)

**POLICY**

**Violence Not Tolerated**
Trinity College is committed to a safe and secure environment for all employees, students, and visitors. Conduct that threatens the health or safety of any person, or creates a reasonable fear that such a result will occur, including but not limited to: acts of violence, threats of violence, possession of weapon(s) on college-controlled property, without proper written authorization, threatening behavior, and/or reckless disregard for the health or safety of any person are not acceptable conduct at Trinity College and will not be tolerated. Violation of this policy and/or the Code of Student Conduct will result in disciplinary action up to and including termination of employment and/or dismissal from the College.

**Responsibility**
The entire College community shares the responsibility for a safe and secure campus. Knowledge of violent acts or threats planned or carried out are to be reported to supervisors or other appropriate campus administrators immediately. In case of emergency, please call 911 and/or press one of the College's panic alarms or blue light for assistance.

**Application**
This policy covers all persons:
- On College property;
- At College-sponsored events;
- Fulfilling duties of a college student off-campus (such as work in the clinical setting);
-Engaging in any action having direct impact on the College community.

**PROCEDURE**

**Reporting On Campus**
The College has procedures for responding to and addressing conduct that violates this policy and urges all students, employees, and visitors to be alert to the possibility of violence on campus. As part of the College community, all students, employees, and visitors are responsible for reporting violence they experience or witness.

Students, faculty, staff, and visitors should address emergencies by calling 911. Violence or threats against self or others should not be ignored or disregarded. If experiencing or observing an immediate threat or violent situation, local law enforcement is to be alerted as soon as possible. Delayed reporting may unnecessarily allow the behavior to continue, cause harm, or jeopardize the investigation due to the passage of time, fading memories, or departure of witnesses.

The A.L.I.C.E. response utilizes five steps to increase chances of survival during a surprise act of violence on campus. The A.L.I.C.E. response does not follow a set of required actions. Survival is paramount in this situation. It may be appropriate to use only one or two parts of the response plan or utilize all five parts. In this type of incident, perception is the reality and individuals will decide what appropriate action to take; dealing with known information and disregarding unknown information.

1. **Alert** - Announcement of the onset of the emergency can be anything.
   - Gunfire
   - Witness
   - Phone alert

2. **Lockdown** - This is a semi-secure starting point from which to make survival decisions. Internal lockdown should occur immediately by all who decide not to evacuate.
   - Secure the room
   - Lock the door
   - Cover any windows in the door if possible
   - Tie down the door, if possible, using belts, purse straps, shoe laces, etc.
   - Barricade the door with anything available (desks, chairs, etc.)
   - Look for alternate escape routes (windows, other doors)
   - Call 911
   - Pull the panic alarm found near the door
   - Move out of the doorway in case gunfire comes through
   - Silence or place cell phones on vibrate
   - Once room is secured, do not open the door for anyone. Police will enter the room when the situation is over
   - Gather weapons (coffee cups, chairs, books, pens, etc.) and mentally prepare to defend yourself or others
• Put yourself in position to surprise the active shooter should they enter the room
• If you are in lockdown for a long period of time, give consideration to issues such as bathroom use, keeping people calm, etc.
• Be prepared to provide first aid

External lockdown - Exterior campus lockdown will be determined by law enforcement based on the circumstances of the incident.

3. **Inform**- Use any means necessary to pass on real time information.
   • Can be derived from 911 calls
   • Give in plain language
   • Tell who you are
   • Explain what is happening - active aggressor/active killer shooting on site
   • Describe where on campus and what room
   • Describe how - shots fired/multiple-burst of shots fired, include type of weapon(s)
   • Include movements and actions of the suspect(s) if known

4. **Counter**- This is the use of simple, proactive techniques should students and/or staff be confronted by the aggressor(s); counter techniques interrupt the violent actions of the suspect.
   • Anything can be a weapon
   • Throw things at the aggressor’s head to disrupt their aim
   • Create as much noise as possible
   • Attack in a group (swarm)
   • Grab the aggressor’s limbs and head and take them to the ground and hold them there
   • Fight dirty- bite, kick, scratch, gouge eyes, etc.
   • If you have control of the aggressor call 911 and tell the police your location and listen to their commands when officers arrive on scene

5. **Evacuate**- Remove yourself from the danger zone as quickly as possible.
   • Decide if you can safely evacuate
   • Run in a zigzag pattern as fast as you can
   • Do not stop running until you are far away from the area
   • Bring something to throw with you in case you would encounter the aggressor(s)
   • Break out windows and attempt to quickly clear glass from the frame
   • Do not attempt to drive from the area

**Reporting on Clinical**
The UnityPoint - Trinity Medical Center phones (Rock Island, Moline and Bettendorf) can also be used to report emergencies by dialing “6000”. A switchboard operator will recognize this as a priority call. The operator will notify security officers to report to the needed area.

**Non-Emergency Concerns**
Members of the College community are encouraged to report other behavior that is unusual or threatening even if it is not perceived as an immediate, dangerous, or imminent risk. To report
concerns that may not pose an immediate threat, an Incident Form should be completed. Faculty or the Director of Student Services and External Relations should be contacted. The Incident Form is located on the College website. Concerns over the conduct of a student, employee, or visitor on campus, may be reported to the following persons:

1. Faculty, Dean of Nursing and Health Sciences, or the Director of Student Services and External Relations if the concern is about a student
2. The Director of Student Services and External Relations if the concern is about a student, College employee, or visitor
3. The Chancellor, Dean of Nursing and Health Sciences, or the UnityPoint Health - Trinity Human Resources Employee Relations Manager, if the concern is about a College or UnityPoint Health-Trinity employee

Concerns should include the behaviors involved and the feelings and reaction evoked by the behaviors. List any observers to the incident. Non-emergency concerns require documentation on the Incident Form to be submitted to the Director of Student Services and External Relations.

**Protective Orders/Restraining Orders Issued by a Court**
Members of the College community who have an Order of Protection should provide a copy of the order to the Director of Student Services and External Relations who will notify College staff and UnityPoint Health - Trinity Security as appropriate.

**Notification and Preparedness**
Trinity College, as part of its annual communication on safety, will inform individuals of this policy and its related procedures and resources. The policy is available online and as part of the Annual Campus Crime and Security Report (www.trinity collegeqc.edu). Notifications and testing occur annually. Campus violence prevention is included in New Student Orientation and is a specialty computer-based learning module accessed via the NetLearning Management System. This training includes College faculty, staff, and students.

**Emergency Alert System**
This alert system is used to notify the campus community of threats to physical safety in emergency situations (tornado, violence, hazardous material incident, College closure, severe weather, etc.). The Trinity Alert allows Trinity College administrators to send recorded or electronic emergency messages to Trinity College students, faculty, and staff simultaneously by cell phone, home phone, and e-mail using contact information from the College Directory. In an emergency situation the College will, without delay, send out an announcement taking into account the content of the notification, and initiate the Trinity Alert System, unless the notification will, in the professional judgment of authorities, compromise efforts to assist victims or to contain, respond to, or otherwise mitigate the emergency.

Administration or designated law enforcement personnel will determine the severity and extent of the emergency and to whom the alerts should be sent. Administration or the designated person will determine the content of the message and subsequently initiate the notification system. The Director of Student Services and External Relations is the primary contact person for the Trinity Alert System.
The Trinity Alert System is built upon the Connect-ED System, developed specifically for schools, colleges, and universities by Blackboard Connect. Emergency Alerts will also be posted on the website.

The Emergency Alert System will be tested at least once annually.

**Confidentiality**
Confidentiality of complaints and parties will be preserved to the greatest extent possible, understanding that the College may have an obligation to take some action even if the complainant is reluctant to proceed. Parties and witnesses to a complaint are also expected to maintain confidentiality of the matter, understanding that they will often not have all the facts and they could impair the investigation by divulging information to persons outside of the investigatory process.

**Non-Retaliation and False Claims**
The College prohibits retaliation against persons who in good faith report violations of policy or cooperate in an investigation. The College also prohibits the filing of knowingly false or misleading reports and providing knowingly false or misleading information in an investigation. Discipline or other action can result from either of these acts of violation of policy.

**Threat Management**
The Campus Violence Prevention Committee, Threat Assessment Team, and Critical Incident Team are formed to promote awareness and responsiveness across campus to avoid or address situations that may involve violence, threats, intimidation, or property damage. Leaders of the respective teams communicate with each other and collaborate when there is an issue involving an individual not affiliated with the College and when a particular concern about a student, faculty or staff member has implications for the campus community.

**Campus Violence Prevention Committee**
The Campus Violence Prevention Committee is a standing committee that functions to provide support, assistance, research, and policy review in regard to violence prevention on campus. The Committee is chaired by the Director of Student Services and External Relations and shall include representatives from the Faculty/Staff/Students, and other departments or units when deemed appropriate.

The Committee shall be responsible for the following:

- Incorporate violence prevention strategies into related policies and/or procedures;
- Encourage zero tolerance policy statements that reaffirm violence prevention strategies;
- Integrate existing campus programs and policies that deal with associated issues (e.g. workplace violence, suicide prevention, anti-bullying, stigma reduction, sexual assault prevention);
- Evaluate physical facilities and grounds and make recommendations to improve safety and further the goal of violence prevention;
- Assist with the implementation of the Campus Violence Prevention Plan throughout
The Committee shall ensure that campus safety is integral to new student orientation sessions and that all faculty, staff, and students complete an annual NetLearning module on Responding to Acts of Campus Violence.

**Threat Assessment Team**

Team members request a meeting whenever a potential or actual act of campus violence issue is brought to light. Meetings shall be convened and facilitated by the Director of Student Services and External Relations. Members shall share information and make decisions about next steps to be taken. Membership shall include the Director of Student Services and External Relations, Chair of the Student Affairs Committee, Dean of Nursing and Health Sciences, College Chancellor, and the UnityPoint Health-Trinity Employee Assistance Program Counselor as appropriate.

The Threat Assessment team will identify, monitor, and when deemed necessary, recommend appropriate interventions for Trinity students, faculty, and staff who display unhealthy, threatening, and/or dangerous patterns of behavior. Such behaviors include, but are not limited to:

1. Suggesting intent to harm self or others.
2. Creating disruptions in the work/learning environment.
3. Intimidating other faculty, staff, and/or students.
4. Stalking or following someone with the intent to harass, intimidate, harm, or cause other malicious activity.
5. Acting in a frightening or threatening manner.

**Team Responsibilities include:**

1. Issue/concern is identified by or reported to Director of Student Services and External Relations by submission of the Incident Form by phone or in person.
2. The Threat Assessment Team assesses the behaviors of concern based on:
   a. Investigation of incident.
   b. Review of the student/staff/faculty record and previous incidents.
   c. The NaBITA Threat Assessment Tool.
   d. Additional pertinent information discovered through investigation.
   e. Communication with administration, faculty, and supervisors as appropriate.
3. Recommend appropriate action/intervention[s] to the Critical Incident Team.
4. Point person is identified to monitor the situation. This may be faculty, staff, or an administrator.
5. Point person provides regular updates to Threat Assessment Team until the issue is resolved.
6. In some cases, it may be reasonable for the College to take interim measures or impose restrictions on contact with persons who may be subject to a threat of violence. In
addition, the College may also revoke permission of persons violating this policy from remaining on campus.

7. A factual description of the response will be documented, as appropriate, including the incident report and additional information. Report will be kept by the Director of Student Services and External Relations in a designated folder.

Critical Incident Team
Trinity College has a values based commitment to creating an optimal learning environment for all College students. These values include providing a supportive environment of a small-college experience. The Critical Incident Team is chaired by the Chancellor or designee and membership shall include the Director of Student Services and External Relations and the Dean of Nursing and Health Sciences. The Critical Incident Team serves as a coordinating entity in responding to critical incidents affecting students; to assist local emergency agencies with their response to critical incidents affecting students; and to assist students to return to normal activities following a critical incident.

Definition of a Critical Incident
A critical incident is an adverse event that causes or has the potential to cause harm to an individual student, group of students, or the College and requires immediate response from the Critical Incident Team. The Campus Violence Prevention Committee has defined the critical incidents to which they may respond to include:

- Suicide attempt/threat
- Non-suicidal self-injurious behavior that is disruptive, requires medical attention, occurs under the influence of alcohol and/or drugs
- Homicidal threat/significant homicidal ideation
- Death of a student (on or off campus)
- Fire/explosion or significant damage to property affecting students
- Communicable disease
- Life threatening injury or illness of a student
- Missing person
- Sexual assault
- Natural disaster affecting students

Trinity College recognizes that the above list may not cover all situations that warrant intervention.

Recovery from Violent Situation
After a violent situation occurs, the affected employees, students, or families may often face difficulties in resolving their feelings and concerns. As situations are assessed, the Trinity College Campus Violence Prevention Committee can, in collaboration with the Critical Incident Team, facilitate group discussions or debriefing sessions as needed for the affected area to provide some understanding of and closure to the situation. Accommodations may be made for those students affected by acts of violence.
External Resources
Department of Children and Family Services – The State of Illinois Public Act 97-0711 amended the Abused and Neglected Child Reporting Act (ANCRA) to mandate that all personnel of higher education institutions report cases of suspected child abuse or neglect to the Department of Children and Family Services (DCFS) toll-free, 24-hour Child Abuse Hotline at 1-800-24-ABUSE (22873). UnityPoint Health, Trinity Net Learning – includes the following required certifications of faculty, staff and students:

- Illinois DCFS Child Abuse Mandatory Reporting Training
- Iowa Mandatory Abuse – Child
- Iowa Mandatory Abuse – Adult

Mental Health: Student Assistance Program (SAP): All students are eligible to participate in the Student Assistance Program (SAP)* as offered through Precedence, Inc. and UnityPoint Health. Counselors are available to assist students with personal or other issues that arise while a student is at the College. Students may seek SAP assistance independently, or can be referred by their Advisor/Program Coordinator or Dean. Brochures are available in Student Services or from an Academic Advisor. SAP services are available 365 days per year, 24 hours per day by calling (800) 383-7900 or (309) 779-2273. Services are located at 3416 Blackhawk Rd., Rock Island, Illinois. This is a free, limited, confidential program and will not be part of the student’s academic record.

The SAP resource can assist students in accessing the appropriate resources to deal with concerns that might interfere with their personal and educational development while in college. The service is available to every student who has a difficulty or concern. Included in the service is assistance with personal, social, academic, professional, and vocational concerns. Concerns such as drug and alcohol abuse, marital problems, financial trouble, and others can be addressed. *The Student Assistance Program is part of the UnityPoint Health Employee Assistance Program (EAP).

Employee Assistance Program (EAP): This program is an employer-sponsored program utilizing counselors who specialize in the assessment of personal problems. EAP deals with human problems – the kinds that affect personal well-being or ability to perform your job. Confidential assistance for personal problems, at no cost to the employee, is available by calling (800) 383-7900 or (309) 779-2273 to schedule an appointment.

Federal and State Laws and Regulations: The following Federal and State laws provide regulatory compliance with regard to issues of campus safety and violence at public institutions of higher education:

1. The Federal Student Right to Know and Campus Security Act (Clery)
2. Federal Safety and Drug Free Schools and Communities Act
6. Uniform Crime Reporting (Both State and Federal)
7. Federal and State Alcohol, Drug and Weapon Laws
9. Illinois Victims of Trafficking and Violence Prevention Act of 2000 (Sex Offender)
10. Illinois Education Sexual Assault Awareness Act
11. Illinois Mental Health and Developmental Disabilities and Confidentiality Act
12. Illinois Human Rights Act (P.A. 96-0574)
14. Pending Survivor Outreach & Support Act (introduced July 2014)
15. Pending Campus Accountability & Safety Act (introduced July 2014)

Environmental Health and Safety:

**Exterior Lighting** - Exterior lighting for parking lots and buildings are monitored by the security guards. Any deficiencies are reported to UnityPoint Health - Trinity's Facilities Services department. Security guards patrol all building and parking facilities 24/7. Students are encouraged to report any lighting or security concerns to the Student Services staff as soon as they occur.

**Blue Light Station** - Located in the Trinity College of Nursing & Health Sciences parking lot is a BLUE LIGHT EMERGENCY STATION. This is a direct line to the UnityPoint Health - Trinity Safety and Security department. This 9’ tall tower acts as a crime deterrent and serves as an emergency communication system. This tower is wheelchair accessible and has a highly visible push button on its faceplate. A single touch on the push button summons campus officers to the location and triggers the bright blue police-type strobe light on top of the tower, which brightly lights the surrounding area.

**Panic Alarms** - Panic alarms are located in all classrooms and in other key areas, such as offices and restrooms. Students and staff who believe they are in danger may pull these alarms. This will set off an overhead sound system to alert all others in the building and at the same time will transmit an alarm to Per Mar Security. Per Mar Security will notify the local police as well as UnityPoint Health - Trinity security department to respond.

If the panic alarm is heard throughout the building, all classroom doors should be closed and locked, and the lights turned off unless in the affected area. Students, faculty, and staff should stay away from windows and doors. Windows may be used for evacuation purposes if the situation warrants. If faculty and staff are in the impacted area, they need to seek safety in another part of the building or evacuate. When police officers and/or campus security officers arrive, they will handle the emergent situation. Administration/faculty/staff will work with security personnel to diffuse the situation in the safest and most efficient way possible.

**ID Badges** - Each student, faculty, staff member, and Trinity employee can be identified with a Trinity ID badge. Anyone who is not wearing an ID badge can be asked whether he/she needs assistance and asked their purpose for being on campus.
Approval and Revisions
This plan has been approved by the Chancellor, the highest executive official at Trinity College, on behalf of the Board of Trustees of Trinity College in accordance with the College's approval and notification policies and procedures.