

**Columbia College Chicago**

**CAMPUS VIOLENCE PREVENTION PLAN**

Columbia College Chicago

1/6/2015

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# Forward

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## Introduction

Columbia College Chicago is committed to the safety and security of its faculty, staff, students and guests (the “Campus Community”). This Campus Violence Prevention Plan (“CVPP” or the “Plan”) articulates the College’s policies and programs designed to prevent, reduce and/or manage violence – should it occur on campus. The Plan is inter-disciplinary and multi-jurisdictional. It applies to and requires the participation of all members of the “Campus Community” as well as third parties (ie. contracted employees) and facilitates partnerships with local law enforcement.

## Purpose and Plan Objectives

In compliance with the Illinois Campus Security Enhancement Act of 2008, institutions of higher education in Illinois are required to develop an inter-disciplinary and multi-jurisdictional campus violence prevention plan, which includes annual training and exercises. This Plan is a comprehensive document founded on established principles of early intervention, proactive engagement, and the provision of prompt and comprehensive responses to those affected by violent acts. Uniquely tailored to the specifics of Columbia’s culture and environment, the Plan:

- Defines the College’s policy on a violence free campus;
- Identifies the procedures and responsibility of the Campus Community to report acts of violence and threatening behaviors;
- Develops an assessment and intervention mechanism (The Campus Behavioral Assessment Team);
- Outlines existing violence prevention strategies and support services;
- Establishes a governing body to educate the community on The Plan and to identify additional measures to support Plan goals (The Violence Prevention Committee).

## **Applicability**

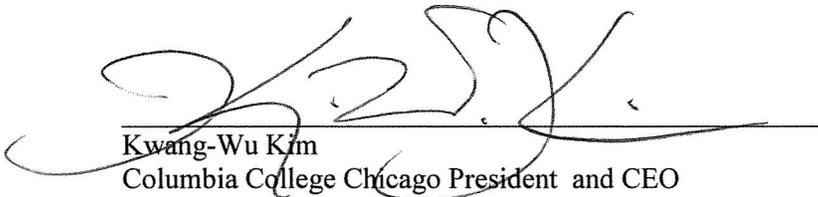
The CVPP articulates requirements pertaining to the prevention and response to violence for the entire Campus Community and governs all College-owned and/or leased property and buildings.

## **Letter of Promulgation**

This plan, which details comprehensive violence prevention efforts, is approved and formally adopted as the Columbia College Chicago Campus Violence Prevention Plan (CVPP).

The CVPP as adopted and approved by the President shall govern campus violence prevention management, planning, policies and procedures.

Adopted on the 9<sup>th</sup> of January, 2015



Kwang-Wu Kim  
Columbia College Chicago President and CEO

## **Enforcement and Implementation Authority**

The Office of Campus Safety and Security, in consultation with the Campus Violence Prevention Committee and the following College offices (as well as other individuals from the Campus Community as needed), shall implement and enforce this plan:

- Division of Student Affairs
- Office of Human Resources
- Office of Academic Affairs
- Office of General Counsel

The Campus Violence Prevention Committee, as explained in Section V, shall review this Plan annually.

## **Distribution List of CVPP Recipients**

The Columbia College Chicago Violence Prevention Plan is published annually and is available to the campus community via the Office of Campus Safety and Security website [www.colum.edu/safety](http://www.colum.edu/safety) and will also be linked to the following websites:

Dean of Students Office      <http://students.colum.edu/>

Human Resources              <http://www.colum.edu/hr>

Provost                              <http://www.colum.edu/provost>

If applicable, hard copies of the CVPP will be distributed annually to the following individuals:

<b>CVPP Recipient</b>	<b>Date Issued</b>	<b>Issued By</b>
President and CEO	1/12/2015	Martha Meegan
Senior Vice President/Provost	1/12/2015	Martha Meegan
Vice President Campus Environment	1/12/2015	Martha Meegan
Vice President Student Success	1/12/2015	Martha Meegan
Vice President of Legal Affairs and General Counsel	1/12/2015	Martha Meegan
Chief of Staff	1/12/2015	Martha Meegan
Vice President Business Affairs/ CFO	1/12/2015	Martha Meegan
Vice President Development	1/12/2015	Martha Meegan
Vice President Marketing and Communications	1/12/2015	Martha Meegan
Associate Vice President Dean of Students	1/12/2015	Martha Meegan
Associate Vice President Human Resources	1/12/2015	Martha Meegan
Associate Vice President Safety and Security	1/12/2015	Martha Meegan
Associate Vice President Facilities and Operations	1/12/2015	Martha Meegan
Assistant General Counsel	1/12/2015	Martha Meegan
Director Campus Safety and Security	1/12/2015	Martha Meegan
Director Academic Information and Communications	1/12/2015	Martha Meegan
Associate Director International Programs	1/12/2015	Martha Meegan

## Record of Changes

The following procedures should be followed when instituting changes to the CVPP:

- The Director of Campus Safety and Security (the “Director”) will issue major changes on copy pages that will be updated in the CVPP. New pages should be inserted as directed. The old pages will be removed and destroyed.
- The Director shall update the hyperlinked Plan after any modification.
- Plan holders will be notified of changes by memorandum and/or email. Plan holders will be responsible for using the modified CVPP.
- When any change is made, an entry should be noted in the following log:

Change Number	Date Entered	Page or Section Changed	Entered by

# Violence Prevention Policy and Plan

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## I. Violence Prevention Policy

Columbia College Chicago has zero tolerance for Campus Violence and is committed to providing the Campus Community with an environment that is free of violence and potentially life threatening behaviors. **Violent Behavior and Threatening Behavior, as defined below, (A) committed by or against any member(s) of the Campus Community, and (B) occurring on College-owned, and/or leased property and buildings OR in connection with any College program or activity, will not be tolerated.**

### Definitions of Prohibited Behavior

**Violent Behavior** includes any behavior, whether intentional or reckless, which results in bodily injury to one's self, another person and/ or damage to property.

**Threatening Behavior** includes any behavior, whether intentional or reckless, that by its nature would be interpreted by a reasonable person as intent to harm one's self, another person or damage property belonging to another. Threatening Behavior may be oral, written, or communicated through multimedia means.

**Campus Violence** encompasses Violent Behavior and Threatening Behavior. Depending on the circumstances, it may include, but is not limited to:

- Physically assaulting a person, or physical threats to inflict physical harm;
- Evidence of significant violent ideations or the expression of violent ideas beyond the scope of a course curriculum;
- Arson, sabotage, equipment vandalism, damaging or destroying property, throwing or hitting objects;
- Displaying or using a weapon; displaying or using an object which appears to be a weapon in a threatening manner; and/or carrying a firearm of any kind onto campus property;
- Intimidating, threatening language, or a pattern of hostile and/or abusive language directed to engage in violence against a person that leads a reasonable person to expect that violent behavior may occur;

- Stalking, domestic and dating violence, as defined by the Violence Against Women's Reauthorization Act of 2013.

### **Sanctions**

Individuals in violation of the College's violence prevention policies may be removed and/ or barred from College property pending the outcome of an investigation and are subject to the imposition of interim remedial steps and disciplinary action up to and including expulsion and termination, consistent with College policies, rules, and collective bargaining agreements as provided in Section II. Individuals may also be referred to law enforcement authorities.

## **II. Related Policies on Violence and Violence Prevention**

The below College policies are related to and support the institution's violence prevention efforts. In the event of a conflict between the terms of this Policy and any other College policy or procedures, excluding the College's Student Sexual Misconduct Policy and Procedures, the terms of this Policy have priority.

### **Employee Code of Conduct**

Employees are expected to comply with established College rules and also observe all other proper standards of conduct. If an employee fails to maintain proper standards of conduct or violates any of the established rules, the employee will be subject to disciplinary action up to and including termination. The full disclosure of the Employee Code of Conduct is located at:

<https://iris.colum.edu/controller/iaudit/Human%20Resources/Code%20of%20Conduct.pdf>

### **Student Conduct Code**

Students are encouraged to value the community and to accept responsibility for their individual behavior as well as for the common good. Columbia College Chicago's Student Code of Conduct is primarily a positive guide to the creation of a community that encourages the personal and intellectual development of each person and secondly, a list of behaviors that would interfere with the important work of our community. The Student Code of Conduct is available at:

<http://www.colum.edu/codeofconduct>

## **Drug and Alcohol Policy**

Columbia College Chicago complies with the Drug Free Workplace Act of 1988 and the Drug Free Schools and Communities Act of 1989 which recognize that all employees, faculty and students have the right to a workplace and educational environment that is drug free. Columbia does not tolerate the manufacturing, possession, use, or distribution of narcotics, illegal drugs, or controlled substances on College premises or at College-sponsored events, both on and off campus. The policy may be found at:

<http://www.colum.edu/drugpolicy>

Pertaining to employees:

Unacceptable behavior within our workplace includes intoxication (under the influence of), possession, sale or attempted sale, purchase or attempted purchase of alcohol or illegal, dangerous or restricted drugs/substances on College property or any participation in or encouragement of the above; The policy may be found at:

<https://iris.colum.edu/hr/Employee%20Relations/DrugFree%20Workplace%20Policy/Forms/AllItems.aspx>

## **Anti-Discrimination and Harassment Policy**

Columbia is committed to maintaining an environment that respects the dignity of all individuals.

Accordingly, Columbia will not tolerate harassment or discrimination based on religion, race, sex, sexual orientation, gender identity or expression, national origin, age, disability or ethnicity by or of its students, faculty or staff. Full disclosure of the policy is available at:

<https://iris.colum.edu/hr/Employee%20Relations/default.aspx>

## **Sexual Harassment and Assault Policy**

In compliance with Title IX of the Education Amendments of 1972, Columbia College Chicago prohibits sexual harassment, including sexual violence and discrimination on the basis of sex in all educational programs and activities. Policy and procedures are disclosed at:

<http://students.colum.edu/handbook/policies/anti-discrimination-and-harassment.php>

## **Sex Offense Registry**

The Federal Campus Sex Crimes Prevention Act of October 2000 requires higher educational institutions to identify where information pertaining to registered individuals convicted of sexual offenses may be obtained. The Office of Campus Safety and Security offers this information upon request; however, information may also be retrieved directly from the Chicago Police Department website

[http://gis.chicagopolice.org/CLEARMap\\_rso/startPage.htm](http://gis.chicagopolice.org/CLEARMap_rso/startPage.htm). As identified by Illinois statute <http://www.isp.state.il.us/sor/>, individuals convicted of sex offense crimes are obligated to register with the State of Illinois, and their place of employment, vocation, education or volunteer service. On campus registration is conducted in the Office of Campus Safety and Security, 916 South Wabash, Room 505. The College policy may be found in the Annual Crime Statistics and Fire Safety Brochure (<http://students.colum.edu/safety/pdf/annual-crime-fire-report.pdf>).

## **Weapons and Firearms Policy**

The possession or carrying of weapons, firearms or explosives on Columbia College property is strictly prohibited and includes the possession or use of fireworks, ammunition, airguns, air soft, or other weapons such as knives, tasers, swords, billy clubs, throwing stars and nunchucks. The webpages listed below address this policy:

Annual Crime Statistics and Fire Safety Brochure:

<http://students.colum.edu/safety/pdf/annual-crime-fire-report.pdf>

Student Code of Conduct:

<http://www.colum.edu/codeofconduct>

## **Computer and Network Usage Policy**

Access to Columbia's computer and network resources imposes certain responsibilities and obligations and is granted subject to College policies and local, state and federal laws. Use of these resources should demonstrate respect for intellectual property, ownership of data, system security mechanisms and individual rights to privacy. Such use should also be free from intimidation, harassment and annoyance. Information about appropriate use of Columbia's computer and network resources is available at <http://students.colum.edu/handbook/policies/technology-resource-acceptable-use-policy.php>

### III. Reporting Responsibilities and Procedures

The prevention of violence requires Campus Community members and third parties to be in a state of awareness, to be conscious of the possibility of Campus Violence, and to be committed to reporting incidents and behavior as described below.

#### Reporting Imminent Danger

Any incident of Violent and /or Threatening Behavior that poses imminent danger and harm to self and/or others and requires an **immediate** response and protection from law enforcement (“Imminent Danger”) must be reported to:

- Chicago Police by dialing 911; provide pertinent information and follow Police directives.
- Campus Security by dialing extension 1111 (312) 369-1111 or by utilizing the Emergency Call Box located on each floor.
- Take protective actions and if able, warn others until Campus Security and /or the Chicago Police respond and assume control of the situation.

#### Reporting Concerning Behavior

Any incident, behavior or action of others, including but not limited to language which appears to be concerning, unusual, disruptive, suspicious, threatening or violent in nature, that does **not** require an immediate response and protection from law enforcement, (“Concerning Behavior”) should be reported to Campus Security by dialing extension 1111, (312) 369-1111 or the appropriate representative listed below. Representatives must forward the report to the Director for review and, if appropriate, an assessment by the Campus Behavioral Threat Assessment Team will be conducted.

- Students - Student Health and Support Services (312) 369-8595
  - The Dean of Students or designee
- Staff – Office of Human Resources (312) 369-7456
  - Assistant Vice President of Human Resources or designee
- Faculty - Office of the Provost (312) 369-7496
  - Provost or designee
- Visitors, Contractors and Campus Affiliates - Campus Security (312) 369-1111
  - Director of Campus Safety and Security or designee

### **Confidentiality of Reports**

To the extent practicable, victims or witnesses of Campus Violence should report all relevant details of an incident including, but not limited to: the date and time of the incident, and the name and contact information of the individuals involved. The College shall endeavor to handle all reports in a secure and responsible manner. Confidentiality will be maintained to the extent allowed by law. Within the Campus Community, the College shall only disclose reported information to those with responsibilities under this Plan or as advised as necessary by the Director.

### **False Reporting**

Deliberately false or misleading reports of violence under this policy will be handled as incidents of unacceptable personal conduct, and any individual making such false or misleading reports will be subject to disciplinary action under the appropriate College policy.

### **Notice of Orders of Protection and No Contact Stalking Orders**

As a precautionary measure, campus members who have been granted a court order of protection or a no contact stalking order are encouraged to disclose the matter to the Director at (312) 369-7729 or a designee from the Office of Campus Safety and Security at (312) 369-3220.

## **IV. The Campus Behavioral Threat Assessment Team**

The Campus Behavioral Threat Assessment Team (CBTAT) is responsible for the review, investigation (including any interim remedial steps or disciplinary action) and follow-up on incidents of Campus Violence. Team Members undergo annual training which may include case studies and/or assessment exercises. The Director shall evaluate the team's procedures and effectiveness based on comments of the community, best practices and updated methodologies.

### **CBTAT Members**

The CBTAT Team is comprised of the following core members with additional support and /or resources offered by listed personnel as needed:

#### **Core Members**

- Office of Campus Safety and Security      Director
- Office of the General Counsel      Assistant General Counsel
- Office of Human Resources      Associate Vice President
- Department of Student Affairs      Dean of Students or Designee
- Office of the Provost      Director Academic Information and Communications
- Office of Counseling Services      Director

Ad Hoc Members

- Student Health and Support      Assistant Dean
- Students with Disabilities      Director
- Residence Life      Representative
- Student Development      Assistant Dean
- Student Relations      Representative

**Process**

The Director, or designee, shall review reports of individuals involved in (1) actions of Imminent Danger and (2) all reports of Concerning Behavior received directly or forwarded by other offices. In consultation with appropriate personnel, the Director of Campus Safety and Security shall take action to address, mitigate and resolve such incidences; and/or instruct CBTAT to further review and act upon those incidences for which he or she determines that such intervention would be helpful.

Upon receipt of a report from the Director, CBTAT shall endeavor to complete the following in a timely fashion:

- Conduct a thorough, fact-based, and comprehensive investigation and threat-assessment;
- Recommend interim remedial steps, pending the outcome of the investigation, to protect the victim and the College Community;
- Address aberrant, dangerous or threatening behavior on campus;
- Provide guidance and best practices for preventing violence;
- Work with the affected College units or departments to develop and implement targeted, unit-specific plans to address the incident’s effects and to prevent the reoccurrence of similar incidences;

- Identify on campus and off campus support services (such as mental health services and crisis management) for individuals affected by the behavior;
- Provide post-incident assessment and evaluate the effectiveness of the College's response to incidents on a case or aggregate basis.

The Campus Behavioral Threat Assessment Team is not intended to address routine workplace or academic issues. All employees are required to cooperate with requests from CBTAT relative to successfully monitoring any Campus Violence.

## **V. Campus Violence Prevention Committee**

In compliance with the Illinois Campus Security Enhancement Act of 2008, the College has formed a Campus Violence Prevention Committee to supplement the work of the Director and CBTAT by offering education, research and training on violence prevention to the Campus Community.

### **Objectives**

The Campus Violence Prevention Committee shall endeavor to:

- Evaluate and provide recommendations on the procedures articulated in the Campus Violence Prevention Plan;
- Incorporate violence prevention strategies into related policies and/or procedures;
- Develop promotional campaigns and annual training programs to educate the College Community on the Plan and violence prevention strategies.

### **Members**

Committee members may include, but are not limited to representatives from the following Offices:

- Campus Safety and Security
- Human Resources
- Residence Life
- Office of Counseling Services
- Student Communications
- Center for Innovation in Teaching Excellence
- Faculty Senate

## VI. Violence Prevention Programs and Support Services

The following list provides examples of past training and services related to violence prevention made available to the Campus Community. Current offerings may be obtained by contacting the appropriate department.

- Crime Prevention Awareness - offered by the Office of Campus Safety and Security either upon request or through new student, faculty and staff orientation programs.
- Violence Prevention for College Housing - provided to new and returning Residence Life Staff on topics ranging from civility to hostile intruder situations.
- Sexual Harassment Awareness Training – offered through the Office of Human Resources for Faculty and Staff.
- Active Shooter Response - offered to departments upon request by the Office of Campus Safety and Security.
- Student Wellness Program Series - featuring sessions throughout the year on Sexual Assault Education and Prevention, Healthy Relationships and Substance Abuse.
- Fire Safety Marshal Training - Offered annually to volunteer staff featuring training on emergency evacuation, fire safety and crime prevention topics.
- Self-Defense Training - Offered free to students on a weekly basis and in a workshop format to faculty and staff upon request.
- Employee Assistance Program (EAP) - free confidential counseling and legal services offered to faculty, staff and their covered dependents; includes 24 hour immediate telephone-based crisis intervention and stabilization services.
- Student Support and Health Services –provides access to a range of support services, including mental health and crisis management on campus and through community resources.
- Student Counseling Center - offering 10 free confidential sessions with Licensed Clinical Professional Counselors (LCPC) and/or Certified Drug and Alcohol Counselors.
- On campus Health Centers – available for students, faculty, staff and dependents.
- iJET Notification and Registration System – provides registration of emergency contact information and notification regarding security risks for faculty, staff and/or students traveling abroad.
- Cyber Security and Password Management Workshops - offered to the Campus Community by the Office of Information Technology focusing on safe computer and internet practices.

## **VII. Campus Violence Security Strategies**

The following information outlines security measures implemented by the College in order to prevent, deter and address Campus Violence.

### **Campus Security Department**

Responsible for the protection of life and campus property, the Office of Campus Safety and Security employs over 60 professionally licensed and trained non-sworn security contract personnel (as of the date of this Plan) consisting of supervisors, patrols, dispatch and stationary officers. Security services are supplemented with contracted law enforcement, when necessary. A security vehicle, Segways and bikes are utilized to patrol the Campus footprint and facilitate a rapid response. Amongst other topics, training for supervising personnel may consist of:

- Chicago Police Department: Crisis Intervention Team Training - response to individuals exhibiting mental health illness
- State and Local Anti-Terrorism Training Program: Terrorism Awareness Training
- Active Shooter Identification and Response
- Department of Homeland Security: Bomb Threats and Suspicious Package Detection

### **Security Technology**

Technology installed and/or employed by the Office of Campus Safety and Security for prevention and response includes:

- On campus Security Command Center which includes radio dispatch, Chicago Police scanner, NOAA weather communications and campus-wide video surveillance systems
- Video surveillance capabilities at security stations located in the lobby of campus buildings
- Emergency Call Boxes located on each floor of the campus buildings
- Public address system located on every floor in campus buildings and emergency mass notification system capable of distributing communications through email, telephone and text messaging
- Access control system, key card readers and distress buttons

## **Emergency Management and Safety Initiatives**

Columbia College Chicago has developed the Emergency Operations and Management Plan which articulates the College's response, management and communications to all hazards that disrupt the academic or business operations of the College. This Plan may be located at:

<https://iris.colum.edu/facilities/Emergency%20Response%20Procedures/Forms/AllItems.aspx>

Other initiatives involving emergency management include:

- Exercises on the Emergency Operations and Management Plan for policy makers, emergency response team and crisis communications team
- Postings of emergency response procedures in campus buildings and on the campus website
- Distribution of notification of ongoing criminal activity occurring within the campus footprint, along with recommended precautionary measures

## **External Committees and Organizations**

Membership in the following external organizations and committees provide Columbia College Chicago with additional support and expertise on issues related to violence prevention:

- Security Council of Professional Educators (SCOPE)
- International Association of Campus Law Enforcement Administrators (IACLEA)
- Building Owners Management Association (BOMA) Security Subcommittee Group and Emergency Preparedness Committee
- FBI Anti-Terrorism Task Force
- Office of Emergency Management and Communications Public/ Private Task Force
- ASIS International

## **VIII. Federal and State Regulations Related to Violence Prevention**

The following are some of the federal and state regulations related to violence prevention:

- A. The U.S. Department of Education  
<http://www2.ed.gov/about/offices/list/ope/policy.html>
- The Federal Student Right to Know and Campus Security Act (Clery)
  - Higher Education Act of 1998
  - Higher Education Opportunity Act, 2008
- B. 1988 Federal Drug Free Workplace Act  
<http://www.dol.gov/elaws/asp/drugfree/screen4.htm>
- C. Reauthorization of Violence Against Women Act, 2013  
<http://www.govtrack.us/congress/bills/113/s47/text>
- D. Illinois Campus Security Enhancement Act 2008, (110 ILCS 12/)  
<http://www.ibhe.org/>
- E. Illinois Gun Safety and Responsibility Act – Conceal and Carry, 2013  
<http://www.isp.state.il.us/>
- F. Illinois Child Abuse and Neglect Reporting Act  
<http://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=1460andChapterID=32>
- G. Illinois Campus Demonstrations Act  
<http://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=1053andChapterID=18>
- H. Illinois Mental Health and Developmental Disabilities and Confidentiality Act  
<http://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=2043andChapterID=57>

## **IX. Policy Review and Modification**

The College reserves the right to modify or amend this Policy at any time. Any modifications shall not be retroactively applied to any pending investigations.