

**Jeanne Clery Disclosure of Campus Security
Policy and Campus Crime Statistics Report for
2023**

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1. Annual Security Report

To maintain compliance with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act (Clery Act), the Higher Education Act (HEA) requirements, and related statutes and regulations, and in an effort to continuously promote and improve safety and security measures on campus, Westcliff University and all affiliated campuses including Western State College of Law collect and publishes information regarding its security policies, available services and crime statistics. Once collected, the information is presented annually in this Annual Safety and Security Report (ASR) to prospective and current students, employees, and the public.

The ASR is published every year by October 1st and contains three years of campus crime statistics and campus security policy statements for all Westcliff University Campuses. Information pertaining to each campus location is clearly designated using appropriate headers throughout the ASR.

Any section that is not clearly designated for a specific campus is applicable to all campus locations.

All crime statistics contained in this ASR are for Clery Act reportable crimes occurring on the referenced campus and on public property, including thoroughfares, streets, sidewalks, and parking facilities, within a campus or immediately adjacent to or accessible from the campus, as defined by 34 C.F.R. § 668.46(a).

The ASR also includes current policies required pursuant to the current version of 34 C.F.R. § 668.46 and the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act (Clery Act), as amended by the Violence Against Women Reauthorization Act of 2013 (VAWA), Pub. Law 113-4.

The crime statistics contained in this ASR, as reported annually to the U.S. Secretary of Education, can also be viewed by searching Westcliff University's name at <https://ope.ed.gov/campussafety/>.

Westcliff University - Irvine Campus:

Westcliff University's Irvine campus is the main campus location. The Westcliff University Campus ASR committee coordinates with the other institutional campuses to compile the institutional ASR.

Crime data for Westcliff University's Irvine campus is based on Clery crime information obtained from the school's Campus Security Authority personnel (CSA), the campus crime log, and local law enforcement agencies. For more information about CSAs see section 4.d of this ASR.

Institutional administrators prepare this ASR, which includes reported campus crime and crime statistics from local law enforcement agencies. These sources of information are utilized in the review process regarding the ASR. All documentation used in the review process is kept by the Facilities Manager, Human Resources Director, and Dean of Student Affairs.



The ASR is distributed to all enrolled Westcliff University, Irvine students and current employees via a notice by electronic mail stating that the current version of the ASR has been posted to the school's website <https://www.westcliff.edu/> . The notice includes a description of the information provided in the ASR, a direct link to the ASR, and indicates that a paper copy of the ASR will be provided upon request by contacting the Financial Aid Compliance Specialist at jaimelang@westcliff.edu .

New students are informed of the availability of the ASR during Title IX training during their New Student Orientation and employees are informed by HR through the required review of the employee handbook.

Additionally, a copy of the current ASR is made available to the public on Westcliff University's website, and links to the ASR are contained in the Employee Handbook and Student Catalog.

Any questions about this ASR should be directed to the members of the ASR Committee which include: the Westcliff University Facilities Manager, the Senior Director of Human Resources (former Director of Human Resources), the Westcliff University Dean of Student Affairs, the Vice President of Growth and Enrollment (former VP of Operations), the WSCL Associate Dean of Student Services, the Westcliff University Miami Assistant Campus Director.

Western State College of Law:

Western State College of Law (WSCL) coordinates with the Westcliff University Irvine Campus to compile the institutional ASR. Crime data for WSCL is based on Clery crime information obtained from the school's Campus Security Authority personnel (CSA), the campus crime log, and local law enforcement agencies. For more information about CSAs see section 4.d of this ASR.

Institutional administrators prepare this ASR, which includes reported campus crime and crime statistics from local law enforcement agencies. These sources of information are utilized in the review process regarding the ASR. All documentation used in the review process is kept by the Facilities Manager at Westcliff University's Irvine Campus as well as the Westcliff University Human Resources Director and Dean of Student Affairs.

The ASR is distributed to all enrolled students and current employees via a notice by electronic mail stating that the current version of the ASR has been posted to the school's website <https://www.wsulaw.edu/>. The notice includes a description of the information provided in the ASR, a direct link to the ASR, and indicates that a paper copy of the ASR will be provided upon request by contacting the Student Affairs Office during regular business hours.

New students and employees are informed of the availability of the ASR by the Senior Assistant Dean of Student Affairs, for students, or by Westcliff University Human Resources for faculty and staff.

Additionally, a copy of the current ASR is made available to the public on WSCL's website, and links to the ASR are contained in the Employee Handbook and Student Catalog.

Any questions about this ASR should be directed to the members of the ASR Committee which includes: the Westcliff University Facilities Manager, the Senior Director of Human Resources (Director of Human Resources), the Westcliff University Dean of Student Affairs, the Vice President of Growth and Enrollment (former VP of Operations), the WSCL Associate Dean of Student Services, the Westcliff University Miami Assistant Campus Director.

Westcliff University - Miami Campus:

Westcliff University's Miami campus coordinates with the Westcliff University Irvine campus to compile the institutional ASR. Crime data for Westcliff University's Miami campus is based on Clery crime information obtained from the school's Campus Security Authority personnel (CSA) and local law enforcement agencies. For more information about CSAs see section 4.d of this ASR.

Institutional administrators prepare this ASR, which includes reported campus crime and crime statistics from local law enforcement agencies. These sources of information are utilized in the review process regarding the ASR. All documentation used in the review process is kept by the Facilities Manager at Westcliff University's Irvine Campus as well as the Westcliff University Human Resources Director and Dean of Student Affairs at Westcliff University's Irvine Campus.

The ASR is distributed to all enrolled Westcliff University, Miami students and current employees via a notice by electronic mail stating that the current version of the ASR has been posted to the school's website: <https://www.westcliff.edu/> . The notice includes a description of the information provided in the ASR, a direct link to the ASR and indicates that a paper copy of the ASR will be provided upon request by contacting the Financial Aid Compliance Specialist at jaimelang@westcliff.edu .

New students are informed of the availability of the ASR during Title IX training during their New Student Orientation and employees are informed by HR through the required review of the employee handbook.

Additionally, a copy of the current ASR is made available to the public on Westcliff University's website, and links to the ASR are contained in the Employee Handbook and Student Catalog.

Any questions about this ASR should be directed to the members of the ASR Committee which include the Westcliff University Facilities Manager, the Senior Director of Human Resources (former Director of Human Resources), the Westcliff University Dean of Student Affairs, the Vice President of Growth and Enrollment (former VP of Operations), the WSCL Associate Dean of Student Services, the Westcliff University Miami Assistant Campus Director.

2. Clery Geographical Areas

The Clery Act requires each institution to disclose certain crime statistics that occur on three types of property: campus, non-campus buildings or property, and public property areas.

“Campus” is defined as buildings or property owned or controlled by the institution within the same reasonably contiguous geographic area and used by the institution in a manner related to the institution’s educational purpose. It also includes property in that contiguous area owned by the institution but controlled by another person, if that property is used by students and supports institutional purposes (e.g. a food or retail vendor). Branch campuses and geographically disconnected administrative divisions or schools would be considered separate campuses for the purposes of reporting.

“Public property” is property that is located within the same reasonably contiguous geographic areas of the campus, such as a sidewalk, street or public parking lot, that is adjacent to a facility owned or controlled by the institution for purposes related to the institution’s educational purposes. Crimes occurring on “public property” must also be reported in the crime statistics.

A “non-campus building or property” is one that is owned or controlled by a school recognized student organization, or one that is owned or controlled by the institution and used by students or by the institution for education-related purposes and that is not within the same reasonably contiguous geographic area of the campus. Crimes occurring on “non-campus property” must be reported. However, incidents occurring on public property adjacent to “non-campus buildings or property” do not have to be included.

Westcliff University uses various contracted facilities for athletic activities. These locations are considered non-campus properties during the contracted hours. A list of non-campus properties and their times of use can be found in section 3.d of this ASR. Crime reported at a non-campus property during the times provided from 2020-2022 are included in the Clery Crime statistics found in section 10 of this ASR.

For the purposes of Clery Reporting, Westcliff University currently has two campuses:

1. Westcliff University Irvine Campus including Western State College of Law (WSCL)*

Main Westcliff University Campus Address:

17877 Von Karman Ave Suite 400 Irvine, CA 92614

Western State College of Law Addresses:

16715 Von Karman Ave, Irvine, CA 92606

16735 Von Karman Ave, Irvine, CA 92606

2. Westcliff University- Miami Campus

825 Brickell Bay Drive Suite 1841, Miami, FL 33131

*Though Westcliff University’s Irvine Campus and Western State College of Law (WSCL) are considered a single campus for the purposes of clery reporting they have separate policy statements and administrators. For this reason different policy sections are provided for Western State University- Irvine and Western State

College of Law throughout this ASR, however, their crime statistics are reported together in section 10 and in the online database report that goes to the US Secretary of Education.

The Westcliff University Miami Campus is considered a separate campus for Clery Reporting and has separate policy statements and Clery Crime statistics as identified by the appropriate heading in each section of this ASR.

3. Campus Security and Maintenance

Westcliff University is committed to preventing workplace violence and to maintaining safe working and learning environments for all students and staff on campus. All students and employees, including supervisors and temporary employees, are to be treated with courtesy and respect at all times. Conduct that threatens, intimidates, or coerces another employee, student, or member of the public at any time, including off-duty periods, will not be tolerated. This prohibition includes all acts of harassment, including harassment that is based on an individual's sex, race, age, or any characteristic protected by federal, state, or local laws and applies to all Westcliff University Campuses including Westcliff University Irvine, Westcliff University Miami, and Western State College of Law.

3.a Security and Access to Campus Facilities

Westcliff University has secure facilities with the ability to limit access and maintain a safe environment for students, employees, and guests.

Westcliff University - Irvine Campus:

Security personnel from I.P.S. Inc patrol the 4th floor suite of the Intersect Building in which Westcliff University's Irvine Campus is located. The I.P.S. Inc security personnel are also stationed at the front desk of Westcliff University's Irvine campus. All students and staff are required to sign in using an electronic tablet at the front desk prior to entering.

Westcliff University does not have any campus residences.

Western State College of Law:

Security on the Western State College of Law (WSCL) campus is provided by the Allied Universal Security Services, which provides 24-hour security with a locked building access system. Though the building is accessible to the public during regular business hours, it is only accessible after hours via personally issued cards. Von Karman Creative Campus (VKCC), the owner of the center in which the WSCL campus is located, uses the same security system to provide 24-hour security in the immediate area, including the parking lot servicing the WSCL campus.

WSCL does not have any campus residences.

Westcliff University Miami Campus:

The Miami campus is located on the 18th floor of a building with 24 hour security. Access to the Westcliff campus in Miami requires students to be granted access the following ways:

- a) A staff member with an updated student list stays at the lobby allowing students to the campus after all identification requirements have been met.
- b) A phone system with direct access to the campus is located at the entrance of the building, student and staff members must dial *157, when the communication has been established and the identification requirements have been met, students are buzzed into the building.

The Westcliff University Miami campus operates within a building that is owned by Open Hearts Language Academy (OHLA). This building has 24 hour security conducted by Kent Security as part of the operational requirements from the building owner. Security visits in the campus are provided by Kent Security, if written reports are made due to complaints or criminal activity they are also conducted by Kent Security.

Security Officers continually monitor the access of people into the building and into the campus. They also monitor all exterior areas that are not part of the Westcliff University Miami Campus but are part of the building in which the campus is located by performing periodic inspections. These areas include both swimming pools, the gym, marina, lobby, all towers, and the Westcliff University Miami campus.

Westcliff University's Miami Campus does not have any campus residences.

3.b Law Enforcement Authority and Security Personnel Jurisdiction

Westcliff University - Irvine Campus:

The I.P.S. Inc. security personnel that are located at the front entrance of the Westcliff University Irvine Campus have the authority to ask for identification and determine whether individuals have lawful business at Westcliff University and to grant or deny access to the campus.

No commissioned officers are located at the Westcliff University, Irvine Campus and security officers do not possess arrest authority.

Westcliff University has a working relationship with the Irvine Police Department, but no formal written contracts and no Memoranda of Understanding (MOU) exist between Westcliff University and any law enforcement agency. Criminal incidents are reported to the local police department with jurisdiction over the campus.

Western State College of Law:

Western State College of Law (WSCL) security officers have the authority to ask persons for identification and to determine whether individuals have lawful business at the location and grant or deny access to the campus.

No commissioned officers are located at the WSCL campus and security officers do not possess arrest authority.

WSCL has a working relationship with the Irvine Police Department, but no formal written contracts and no Memoranda of Understanding (MOU) exist between WSCL security and any law enforcement agency. Criminal incidents are reported to the local police department with jurisdiction over the campus.

Westcliff University - Miami Campus:

Westcliff University's Miami Campus does not have its own security department. The security provided at and around the campus are provided through the Open Hearts Language Academy (OHLA), which is the building owner.

An administrator at the Westcliff University campus in Miami is responsible for checking identification and authorizing access into the building. That administrator does not have arrest authority and is not a sworn or commissioned law enforcement officer. Westcliff University has a working relationship with the Miami Police Department but there are no formal written contracts and no Memoranda of Understanding (MOU) between the Westcliff University Miami Campus and local law enforcement agencies.

Security reports are made to the security personnel provided through the building owner. Crimes and serious safety concerns should be reported to local law enforcement.

3.c Maintenance of Facilities

Westcliff University - Irvine Campus:

Campus facilities at Westcliff University's Irvine campus are primarily maintained by Hines Property Management. Hines Property Management is responsible for overseeing repairs of the campus facilities. This includes, but is not limited to: making sure that the parking structures are accessible with working security gates, the pathways between the parking structure and campus building are well lit and clear of any hazards, the doors and locks are in good condition, the elevators work and are maintained regularly, the alarm systems are maintained and in working order, emergency stairwells are lit and accessible, security devices including fire extinguishers have not passed their expiration date.

All members of the campus community are encouraged to report any known problems or hazards to the Westcliff University Facilities Manager who can contact Hines Property Management if needed. Quickly identifying and reporting any known problems or hazards will allow the Facilities Manager and Hines Property Management to take action as needed and enhance campus safety for everyone.

Western State College of Law:

Campus facilities at Western State College of Law (WSCL) are maintained by both Von Karman Creative Campus (VKCC) property management and Westcliff University's Facilities Department. VKCC is responsible

for overseeing the majority of repairs of the campus facilities. This includes, but is not limited to: making sure that the doors and locks are in good condition, the elevators work and are maintained regularly, the alarm systems are maintained and in working order, emergency stairwells are lit and accessible, security devices including fire extinguishers have not passed their expiration date. Westcliff University's Facilities department shares responsibility for making sure that the internal parts of the building are in good working order. All members of the campus community are encouraged to report any known problems or hazards to the WSCL Business Manager. The WSCL Business Manager will then open a ticket with either VKCC property management or Westcliff University's Facilities Department so that appropriate action can be taken.

Westcliff University - Miami Campus:

Campus facilities at Westcliff University's Miami campus are maintained by the Open Hearts Language Academy (OHLA). The Open Hearts Language Academy is responsible for overseeing repairs of the campus facilities. This includes, but is not limited to: making sure that the parking structures are accessible with working security gates, the pathways between the parking structure and campus building are well lit and clear of any hazards, the doors and locks are in good condition, the elevators work and are maintained regularly, the alarm systems are maintained and in working order, emergency stairwells are lit and accessible, security devices including fire extinguishers have not passed their expiration date. All members of the campus community are encouraged to report any known problems or hazards to the Westcliff University Miami Campus' Assistant Campus Director. The Assistant Campus Director works with the OHLA maintenance department to make sure that any repairs or safety hazards are addressed appropriately.

3.d Non-Campus Locations and Activities

Westcliff University - Irvine Campus:

The following non-campus properties have been used by Westcliff University from 2020- the present for student athlete activities including practices and games. Westcliff University is required to report any Clery Crime Reports that occurred in these facilities during the specified times of use as crimes reported on non-campus property. Westcliff University does not provide security for any of the following locations, if security is provided it is through the owner of the facility.

These non-campus properties are under the jurisdiction of different local law enforcement agencies depending on the city in which they are located. The local police departments monitor and document criminal activity in these locations. These jurisdictions include the Irvine Police Department for all locations within the city of Irvine, the Huntington Beach Police Department for all locations within the city of Huntington Beach, and the Costa Mesa Police Department for all locations within the city of Costa Mesa.

Westcliff University non-campus properties in use starting between January 2020- December 2022:

- **Momentous Sports Center** located at 14522 Myford Rd, Irvine, CA 92606. Westcliff University had use of the indoor facility from January 2020- May 2023 from 8am-1pm.

- **Golden West College** indoor athletic facilities located at 15744 Goldenwest St., Huntington Beach, CA 92647 from January 2020- the present from 3:30pm-10:00 pm
- **Golden West College** outdoor athletic facilities located at 15744 Goldenwest St., Huntington Beach, CA 92647 from January 2020- the present from 3:30 pm- 10:00 pm
- **Orange County Great Park** outdoor athletic facilities located at 8000 Great Park Blvd, in Irvine CA 92618 from January 2020-the present, from 7am - 1pm
- **Woollett Aquatic Center** outdoor athletic facilities located at 4601 Walnut Ave in Irvine, CA from January 2020- the present, from 9 am- 1pm
- **Jordan Lawley Facility** an indoor athletics facility located at 15350 Barranca Pkwy in Irvine, CA 92618 from January 2021- the present, from 8am- 1pm and 3:30 pm- 10:00 pm
- **Orange Coast College** outdoor athletic facilities located at 2701 Fairview Rd, Costa Mesa, CA 92626 from January 2022-the present, from 3:30-10:00 pm
- **Vanguard University** outdoor athletic facilities located at 55 Fair Dr, Costa Mesa, CA 92626 from January 2022-the present, from 8 am-5pm.

The following locations became Westcliff University non-campus properties for the purposes of Clery reporting during the specified dates in the 2023 calendar year. Any crimes reported at these locations during the times specified below will not be counted in this current ASR, but will be included in Clery Statistics for Westcliff University non campus properties starting in the ASR published next year (2024).

Westcliff University does not provide security for any of the following locations, if security is provided it is through the owner of the facility. These non-campus properties are under the jurisdiction of different local law enforcement agencies depending on the city in which they are located. The local police departments monitor and document criminal activity in these locations. These jurisdictions include the Irvine Police Department for all locations within the city of Irvine, the Lake Forest Police Department for all locations within the city of Lake Forest and the Orange County Sheriff's Department for all locations within the city of Ladera Ranch.

1. **Irvine Unified School District** outdoor athletic facilities located at 5050 Barranca Pkwy, Irvine, CA 92604 from January 2023-present from 11am to 5 pm
2. **Lake Forest Sports Park** outdoor athletic facilities located at 28000 Vista Terrace, Lake Forest, CA 92630 from July 2023-the present from 8 am to 1 pm.
3. **Clava Sports Facility** indoor athletic facilities located at 26923 Fuerte Drive, Lake Forest, CA 92630 from August 2023-April 2024 (contracted use), from 7am- 3pm Monday-Friday
4. **Cox Sports Park** outdoor athletic facilities located at 27623 Crown Valley Pkwy, Ladera Ranch, CA 92694 from September 2023- the present from 8 am - 1 pm

Western State College of Law:

Western State College of Law (WSCL) does not currently have any non-campus locations. It does not have any officially recognized student organizations with off-campus locations and student criminal activity off campus is not monitored.

Westcliff University - Miami Campus:

Westcliff University's Miami Campus does not have any non-campus location. It does not have any officially recognized student organizations with off-campus locations and student criminal activity off campus is not monitored.

4. Procedures for Reporting Criminal Activities or Other Emergencies

The following sections contain information about how students, employees, and guests can report crimes and emergencies and includes summaries of important reporting-related policies.

4.a Reporting Emergencies

An "emergency" includes any dangerous situation involving an immediate threat to the health or safety of students, faculty, staff or guests occurring on or near the campus, including fire. Upon observation of or involvement in any type of emergency, students, faculty, staff and guests of any campus should immediately **call 911** before following any other campus-specific emergency procedures.

Westcliff University - Irvine Campus:

In an emergency situation, students, staff, faculty and guests should first contact the Irvine Police Department by dialing 911, then if it is possible and safe to do so students should contact the Dean of Student Affairs or another available employee and employees should contact the Human Resource Department so that a report can be made and Westcliff University's Emergency Response and Evaluations Procedures (described in section 6 of this ASR) can be activated if needed.

Western State College of Law:

In the event of an emergency, WSCL students, employees, and guests should contact the Irvine Police Department by dialing 911 and then notify the Business Manager or Senior Assistant Dean of Student Affairs, if/when it is safe to do so.

Westcliff University - Miami Campus:

In an emergency situation, students, staff, faculty and guests should first contact the Miami Police Department by dialing 911 and then notify the Assistant Campus Director if it is possible and safe to do so.

4.b Reporting Crimes

Students, faculty, and staff from all campuses are strongly encouraged to report all crimes to local law enforcement. **In an emergency dial 911.** To report any suspicious activity or persons on or around campus contact the local law enforcement agency. Crimes should also be reported to a Campus Security Authority.

Reportable crimes include but are not limited to: criminal homicide including murder, non-negligent manslaughter, and negligent manslaughter; forcible and non-forcible sex offenses; robbery; aggravated assault; burglary; motor vehicle theft; arson; hate crimes; arrests for liquor, drug, and weapons law violations; domestic violence; dating violence; and stalking.

Specific procedures for crime reporting at each of Westcliff's Campuses can be found under the designated campus below.

Westcliff University - Irvine Campus:

Westcliff University encourages all members of its community to report any crimes that they have observed or been involved in to local law enforcement agencies and a Campus Security Authority (CSA), even if they have no intention of pursuing legal action. Reports can be filed by students on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics by contacting the Dean of Student Affairs; employees can file a confidential report for the same purposes with the Human Resource Department. However, it is the policy of Westcliff University to properly document all reported criminal activity and notify the local authorities when required by law.

Students should promptly report all criminal activity or emergencies occurring on or around Westcliff University's Irvine campus to the Dean of Student Affairs. If the Dean of Student Affairs is not available, students may contact any of the Campus Security Authorities along with the Irvine police department by dialing 911 for emergencies or 949-724-7000 for non-emergency reporting.

Westcliff University employees are trained to report conduct violations to immediate supervisors and the Human Resource Department. However, depending on the circumstance around and severity of the crime, Westcliff Universities should also contact the Irvine Police Department by dialing 911 in the case of an emergency or 949-724-7000 for non-emergency reporting, and any Campus Security Authority for internal reporting.

Westcliff University does not have a campus police department, however, Campus Security Authorities can assist students in determining the nature of a crime, contacting the Irvine police department, and making a confidential crime report as described in section 4.f of this report.

A complete list of Campus Security Authorities can be found in section 4.d of this report.

Western State College of Law:

Victims or witnesses to a crime are encouraged to file a report of the incident. Reports can be filed on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics by contacting the Business Manager or Senior Assistant Dean of Student Affairs or any campus security authority. Reports are kept in a secure location in the offices of Business Manager or Senior Assistant Dean of Student Affairs. Names of

victims or witnesses are not disclosed in the crime report. It is the policy of Western State College of Law (WSCL) that all criminal acts or other emergencies be properly documented and reported to local authorities as required by law.

Students and employees should promptly report all criminal actions and emergencies occurring on or around WSCL facilities either in person or by calling to the Business Manager at 714-459-1167 or Senior Assistant Dean of Student Affairs at 714- 459-1117. If the Business Manager or Senior Assistant Dean of Student Affairs are not available, you may contact any member of the senior staff or faculty and the Irvine Police Department by dialing 911 for emergencies or 949-724-7000 for non-emergency reporting.

A complete listing of all Campus Security Authorities can be seen in section 4.d of this report. WSCL does not have campus police, but Campus Security Authorities can assist with contacting the Irvine Police Department or making a confidential report as described in section 4.f.

Westcliff University - Miami Campus:

Westcliff University encourages all members of its community to report any crimes that they have observed or been involved in to local law enforcement agencies and the Assistant Campus Director, even if they have no intention of pursuing legal action. Reports can be filed on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics by contacting the Assistant Campus Director. However, it is the policy of Westcliff University to properly document all reported criminal activity and notify the local authorities as required by law.

Students should promptly report all criminal activity or emergencies occurring on or around Westcliff University's Miami campus to the Assistant Campus Director. If the Assistant Campus Director is not available, students may contact the Westcliff University Main (Irvine) Campus Vice President of Growth and Enrollment (former Vice President of Operations) or Westcliff University Main (Irvine) Campus Dean of Student Affairs along with the Miami police department by dialing 911 for emergencies or 305-603-6640 for non-emergency reporting.

Westcliff University employees are trained to report conduct violations to immediate supervisors and the Human Resource Department. However, depending on the circumstance around and severity of the crime, Westcliff Universities should also contact the Miami Police Department by dialing 911 in the case of an emergency or 305-603-6640 for non-emergency reporting, and the Assistant Campus Director for internal reporting.

Westcliff University does not have a campus police department, however, the Assistant Campus Director can assist students in determining the nature of a crime, contacting the Miami police department, and making a confidential crime report as described in section 4.f of this report.

A complete list of Campus Security Authorities can be found in section 4.d of this report.

4.c Response to Reports of Criminal Activities or Other Emergencies

Reports of crimes, threats, suspicious activity, and any other safety concerns will be investigated by the appropriate party at each of the Westcliff Campuses. Response to these reports will be determined based on the safety concerns of the individuals on and around the campus, the severity of the crime reported, and policies and procedures pertaining to the circumstances including privacy and confidentiality concerns.

Westcliff University - Irvine Campus:

When a Campus Security Authority is notified of a crime or emergency that has or is taking place on or around the Westcliff University Irvine campus they will:

- Immediately assess the situation based on their own judgment or and/or after consultation with other Westcliff University employees, whether the situation warrants contacting 911 and/ or following the emergency response and evacuation procedures summarized in section 6.a of this report.
- Immediately assess, based on their own judgment and/or after consultation with other Westcliff University employees or the local police, whether a “timely warning” should be issued to the campus community as described in section 5 of this report.
- With regard to a reported incident that is or may be an instance of sexual violence, immediately contact Westcliff University’s Title IX Coordinator who has the authority to evaluate and respond in accordance with Westcliff University’s VAWA policies, especially those that relate to reports of sexual violence as described in section 8 of this report.
- The Campus Security Authority will investigate and gather additional information necessary to determine whether the incident should be reported in the crime statistics contained in this ASR.

Western State College of Law:

When the Western State College of Law (WSCL) Business Manager or Senior Assistant Dean of Student Affairs is notified of a crime or emergency that has or is taking place on or around the WSCL campus they will:

- Immediately assess the situation based on their own judgment or and/or after consultation with other WSCL employees, whether the situation warrants contacting 911 and/ or following the emergency response and evacuation procedures summarized in section 6.a of this report.
- Immediately assess, based on their own judgment and/or after consultation with other WSCL employees or the local police, whether a “timely warning” should be issued to the campus community as described in section 5 of this report.
- With regard to a reported incident that is or may be an instance of sexual violence, immediately contact the Senior Assistant Dean of Student Affairs who has the authority to evaluate and respond in accordance with WSCL’s VAWA policies, especially those that relate to reports of sexual violence as described in section 8 of this report.

- The WSCL Business Manager or Senior Assistant Dean of Student Affairs will investigate and gather additional information necessary to determine whether the incident should be reported in the crime statistics contained in this ASR.

Westcliff University - Miami Campus:

When the Assistant Campus Director is notified of a crime or emergency that has or is taking place on or around the Westcliff University Miami Campus they will:

- Immediately assess the situation based on their own judgment or and/or after consultation with other Westcliff University employees, whether the situation warrants contacting 911 and/ or following the emergency response and evacuation procedures summarized in section 6.a of this report.
- Immediately assess, based on their own judgment and/or after consultation with other Westcliff University employees or the local police, whether a “timely warning” should be issued to the campus community as described in section 5 of this report.
- With regard to a reported incident that is or may be an instance of sexual violence, immediately contact Westcliff University’s Title IX Coordinator who has the authority to evaluate and respond in accordance with Westcliff University’s VAWA policies, especially those that relate to reports of sexual violence as described in section 8 of this report.
- The Assistant Campus Director will investigate and gather additional information necessary to determine whether the incident should be reported in the crime statistics contained in this ASR.

4.d Campus Security Authority Personnel

Campus Security Authorities (CSAs) are designated individuals on each of Westcliff University’s campuses to whom crime should be reported. Campus Security Authorities have authorization to record reported crimes in order to accurately report campus Clery Crime Statistics, like those found in section 10 of this ASR. Campus Security Authorities also have responsibility for discerning when reports require additional action to be taken by the University, such as when timely warnings need to be issued or emergency procedures need to be activated.

Westcliff University - Irvine Campus:

Westcliff University’s Irvine Campus Security Authorities are:

Title	Phone
Facilities Manager	949-825-5999 ext 5179
Office Manager	949-825-5999 ext 5096
Facilities Coordinators	949-825-5999 ext 5216 or ext 5401
Senior Director of Human Resources	949-825-5999 ext 5563

Dean of Student Affairs	949-825-5999 ext 5049
IT Business Analyst	949-825-5999 ext 5116
HR Business Partner	949-825-5999 ext 5095
President, CEO	949-825-5999 ext 5988

All members of the campus community are encouraged to report crimes or criminal activity to any of the Campus Security Authorities listed above. This list of Campus Security Authorities is subject to modification, and is not intended to be all inclusive due to changes in responsibilities within the institution.

Western State College of Law:

Western State College of Law's (WSCL) Campus Security Authorities are:

Title	Phone
WSCL Dean	714-459-1140
Associate Dean for Academic Affairs	714-459-1156
Business Manager	714-206-1268 cell / 714-459-1167
Senior Assistant Dean of Student Affairs	714-459-1117
Director of Alumni Relations	714-459-1261
Executive Assistant to the Dean	714-471-7091 cell / 714-459-1168
Director of the Law Library	714-459-1110
Assistant Dean of Admissions	714-459-1108

All members of the campus community are encouraged to report crimes or criminal activity to any of the campus security authorities listed above. This list of Campus Security Authorities is subject to modification, and is not intended to be all inclusive due to changes in responsibilities within the institution.

Westcliff University - Miami Campus:

The Westcliff University Miami Campus Security Authority is the Assistant Campus Director, who can be reached at: 786-798-9836

4.e Campus Crime Log

As a requirement of the Clery Act under 34 CFR 668.46(f) an institution which maintains a campus police or campus security department, must maintain a written, easily understood daily crime log. Entries must be made into this log within two business days of the report of information to the campus police or campus security department unless disclosure of a reported crime is prohibited by law or would jeopardize the confidentiality of the victim. Information that is withheld from the crime log must be disclosed once the adverse effects of doing so is no longer likely to occur.

Information about the Daily Crime Log for each Westcliff University Campus can be found below.

Westcliff University - Irvine Campus:

A Daily Crime Log for Westcliff University's Irvine Campus is maintained by the Department of Human Resources, the Facilities Department, and the Dean of Student Affairs. The crime log is maintained as follows:

- Once a Campus Security Authority has received a report of a crime on the Westcliff University Campus, the circumstances will be investigated and recorded into the crime log.
- Crimes are recorded by date when the crime was reported, the nature, date, time, and general location of each crime, and the disposition of the complaint, if known.
- Westcliff University allows for the public inspection of the logs, except where prohibited by law or when disclosure would jeopardize the confidentiality of the victim or investigation of the case. Any information that is withheld will be disclosed by Westcliff University once the adverse effect described is no longer likely to occur.
- The most recent 60 days of the crime log entries are open to the public for inspection during Westcliff University's normal business hours at the Front Desk Security Area with notification of the Human Resources Department, Facilities Manager, or Dean of Student Affairs. Requests to view portions of the Westcliff University Crime log can be made by contacting the Human Resources Department, Facilities Manager or Dean of Student Affairs and will be made available for review within 2 business days of the request.
- The campus crime log is publicized through the publication and distribution of this ASR

Western State College of Law:

Western State College of Law (WSCL) maintains a Daily Crime Log of all criminal incidents reported to the institution. The Daily Crime Log includes the date and time the incident occurred, the nature of the offense, the location of the offense, the offense allegedly committed and the disposition of the complaint if known. The Daily Crime Log is available for public inspection in the Business Manager or Senior Assistant Dean of Student Affairs offices during normal business hours. The campus crime log is publicized through the publication and distribution of this ASR

Westcliff University - Miami Campus:

The Westcliff University Miami Campus does not have a Campus Police or Security Department and does not require a crime log. Campus Security for Westcliff University's Miami campus is provided by Kent Security, a

third party company contracted by the Open Heart Language Academy (OHLA), who manages the building in which Westcliff's Miami campus is located.

Kent Security keeps track of their patrol area and can weigh in on safety decisions for Westcliff University's Miami campus, such as whether or not a Timely Warning should be issued.

4.f Policies and Procedures for Voluntary and Confidential Crime Reporting

Westcliff University - Irvine Campus:

If a student is a victim of a crime and does not want to pursue action within either Westcliff University's disciplinary system or the criminal justice system, the student still may want to consider making a confidential report. With the student's permission, the Dean of Student Affairs can file a report on the details of the incident without revealing the student's identity. The purpose of the confidential report is to comply with the student's wish to keep the matter confidential, while taking steps to ensure the safety of the student and that of others. Employees have the same right to confidential reporting, but should contact the Westcliff University Human Resource Department to submit a confidential report.

Reports filed in this manner are counted and disclosed in the annual crime statistics for Westcliff University's Irvine Campus. Reports are kept in a secure location accessible to the Dean of Student Affairs and the Human Resource Department.

In accordance with the Clery Act regulations, Campus "Pastoral Counselors" and Campus "Professional Counselors", when acting as such, are not considered to be a campus security authority and are not required to report crimes for inclusion into the annual disclosure of crime statistics. The school uses the services of a third-party service that links students to licensed counselors who provide confidential professional counseling. As a matter of policy, the counselor is encouraged; if and when deemed appropriate, to inform persons being counseled of the procedures to report crimes on a voluntary, confidential basis, for inclusion into the annual crime statistics.

Students at Westcliff University's Irvine Campus are encouraged to contact the Dean of Student Affairs, 949-825-5999 ext 5049 to confidentially report a crime. Likewise, faculty and staff are encouraged to contact the Senior Director of Human Resources, 949-825-5999 ext 5563 to confidentially report a crime.

Western State College of Law:

If a student is a victim of a crime and does not want to pursue action with Western State College of Law's (WSCL) system or the criminal justice system, the student still may want to consider making a confidential report. With the student's permission, the Business Manager or Senior Assistant Dean of Student Affairs can file a report on the details of the incident without revealing the student's identity. The purpose of the confidential report is to comply with the student's wish to keep the matter confidential, while taking steps to ensure the safety of the student and that of others. Reports filed in this manner are counted and disclosed in the annual crime statistics for WSCL. Reports are kept in a secure location accessible to the Business Manager and



Senior Assistant Dean of Student Affairs. Employees have this same right to confidential reporting but should contact either the WSCL Business Manager or Human Resources Department to file a confidential report.

In accordance with the Clery Act regulations, Campus “Pastoral Counselors” and Campus “Professional Counselors”, when acting as such, are not considered to be a campus security authority and are not required to report crimes for inclusion into the annual disclosure of crime statistics. The school uses the services of a third-party licensed psychologist or counselor who provides confidential professional counseling. As a matter of policy, the counselor is encouraged; if and when deemed appropriate, to inform persons being counseled of the procedures to report crimes on a voluntary, confidential basis, for inclusion into the annual crime statistics.

Students are encouraged to contact the Senior Assistant Dean of Student Affairs, 714-479-1117 to confidentially report a crime. Likewise, faculty and staff are encouraged to contact the Business Manager, 714-459-1167 or the Senior Director of Human Resources 949-825-5999 ext 5563 to confidentially report a crime.

Westcliff University - Miami Campus:

If a student is a victim of a crime and does not want to pursue action within either Westcliff University’s disciplinary system or the criminal justice system, the student still may want to consider making a confidential report. With the student’s permission, the Assistant Campus Director can file a report on the details of the incident without revealing the student’s identity. The purpose of the confidential report is to comply with the student’s wish to keep the matter confidential, while taking steps to ensure the safety of the student and that of others. Employees have the same right to confidential reporting, but should contact the Westcliff University Human Resource Department to submit a confidential report.

Reports filed in this manner are counted and disclosed in the annual crime statistics for Westcliff University’s Irvine Campus. Reports are kept in a secure location accessible to the Dean of Student Affairs and the Human Resource Department.

In accordance with the Clery Act regulations, Campus “Pastoral Counselors” and Campus “Professional Counselors”, when acting as such, are not considered to be a campus security authority and are not required to report crimes for inclusion into the annual disclosure of crime statistics. The school uses the services of a third-party service that links students to licensed counselors who provide confidential professional counseling. As a matter of policy, the counselor is encouraged; if and when deemed appropriate, to inform persons being counseled of the procedures to report crimes on a voluntary, confidential basis, for inclusion into the annual crime statistics.

Students at Westcliff University’s Miami Campus are encouraged to contact the Assistant Campus Director, 786-798-9836 to confidentially report a crime. Likewise, faculty and staff are encouraged to contact the Senior Director of Human Resources, 949-825-5999 ext 5563 to confidentially report a crime.

4.g Family Educational Rights and Privacy Act (FERPA)

The Family Educational Rights and Privacy Act allows schools to disclose personally identifiable information from appropriate parties when necessary to protect the health and safety of the student or other individuals. 34 CFR Part 99.36. This regulation applies to all Institutes of Higher Learning and all Westcliff University Campuses.

(a) An educational agency or institution may disclose personally identifiable information from an education record to appropriate parties, including parents of an eligible student, in connection with an emergency if knowledge of the information is necessary to protect the health or safety of the student or other individuals.

(b) Nothing in this Act or this part shall prevent an educational agency or institution from:

(1) Including in the education records of a student appropriate information concerning disciplinary action taken against the student for conduct that posed a significant risk to the safety or well-being of that student, other students, or other members of the school community;

(2) Disclosing appropriate information maintained under paragraph (b)(1) of this section to teachers and school officials within the agency or institution who the agency or institution has determined have legitimate educational interests in the behavior of the student; or

(3) Disclosing appropriate information maintained under paragraph (b)(1) of this section to teachers and school officials in other schools who have been determined to have legitimate educational interests in the behavior of the student.

(c) In deciding under paragraph (a) of this section, an educational agency or institution may consider the totality of the circumstances pertaining to a threat to the health or safety of a student or other individuals. If the educational agency or institution determines that there is an articulable and significant threat to the health or safety of a student or other individuals, it may disclose information from education records to any person whose knowledge of the information is necessary to protect the health or safety of the student or other individuals. If, based on the information available at the time of the determination, there is a rational basis for the determination, the Department will not substitute its judgment for that of the educational agency or institution in evaluating the circumstances and making its determination.

5. Timely Warnings

Timely warnings are provided to give students, faculty, and staff notification of crimes that have occurred on the institution's geographic area and have been reported to campus security authorities or to local police agencies and are considered by the institution to represent a serious or continuing threat to students and employees. Timely warnings are not limited to violent crimes or crimes against a person, but may be threats to persons or to property. For example, there may be a rash of burglaries or motor vehicle thefts that merit a warning because they represent a continuing threat to the campus community.

The decision to issue a timely warning is based on the nature of the crime, the continuing danger to the campus community, and the possible risk of compromising law enforcement efforts. The timely warning should allow the members of the campus community to protect themselves.

A description of Timely Warning Procedures can be found for each Westcliff University Campus below:

Westcliff University - Irvine Campus:

When Westcliff University becomes aware of a crime reported on or near the Westcliff University Campus, school officials will investigate the circumstances around the report. This may include reviewing previous reports made to CSAs and listed on the campus crime log, as well as reaching out to the Irvine Police Department. The decision to issue a timely warning will be based on the nature of the crime, the continuing danger to the campus community, and the possible risk of compromising law enforcement efforts. This decision will ultimately be made by the Facilities Manager in consultation with other campus officers such as the President, CEO; Senior Director of Human Resources; Dean of Student Affairs; and Vice President of Growth and Enrollment (former Vice President of Operations).

Timely warning notifications are provided to the campus community in a variety of ways so that the warning will be able to reach the entire campus community. The timely warning will include incident specific information about the crime that triggered the warning and all information necessary to promote safety and aid in the prevention of similar crimes.

Once Westcliff University determines the content of the warning, a timely warning notification will be provided through a variety of mechanisms, including: a post on the school website, emails sent to members of the campus community, and paper notifications posted around the Westcliff University Campus.

Western State College of Law:

When Western State College of Law (WSCL) becomes aware of a crime reported on or near the WSCL campus, school officials will investigate the circumstances around the report. This may include reviewing previous reports made to CSAs and listed in the campus crime log, as well as reaching out to the Irvine Police Department. The decision to issue a timely warning will be based on the nature of the crime, the continuing danger to the campus community, and the possible risk of compromising law enforcement efforts. This decision will ultimately be made by the WSCL Business Manager in consultation with the Dean of the Law School and other WSCL campus officers such as the Assistant Dean of Student Affairs, as well as campus officials from the Westcliff University Main Campus in Irvine such as: the President, CEO; Facilities Manager; and Vice President of Growth and Enrollment (former VP of Operations).

Timely warning notifications are provided to the campus community in a variety of ways so that the warning will be able to reach the entire campus community. The timely warning will include incident specific information about the crime that triggered the warning and all information necessary to promote safety and aid in the prevention of similar crimes.

Once WSCL determines the content of the warning, timely warning reports may be provided via email, posters, letters or flyers.

Westcliff University - Miami Campus:

When Westcliff University becomes aware of a crime reported on or near the Westcliff University Campus, the Assistant Campus Director will investigate the circumstances around the report. This may include reviewing previous reports made to either the Assistant Campus Director, or the Kent Security personnel patrolling around the campus, and contacting the Miami Police Department. The decision to issue a timely warning will be based on the nature of the crime, the continuing danger to the campus community, and the possible risk of compromising law enforcement efforts. This decision will ultimately be made by the Assistant Campus Director in consultation with other Main (Irvine) Campus officers such as the President, CEO; Senior Director of Human Resources; Dean of Student Affairs; and Vice President of Growth and Enrollment (former VP of Operations) and officers of the Open Hearts Language Academy (OHLA) in which the Westcliff University Campus is located.

Timely warning notifications are provided to the campus community in a variety of ways so that the warning will be able to reach the entire campus community. The timely warning will include incident specific information about the crime that triggered the warning and all information necessary to promote safety and aid in the prevention of similar crimes.

Once Westcliff University determines the content of the warning, a timely warning notification will be provided through a variety of mechanisms, including: a post on the school website, emails sent to members of the campus community, and paper notifications posted around the Westcliff University Campus.

6. Emergency Response, Notifications, and Evacuation Procedures

This section of the ASR covers Westcliff University's emergency protocol and procedures. This includes statements about how each campus will respond to emergency situations, protocol for declaring emergencies and sending notifications and evacuation procedures and practices.

6.a Emergency Response Procedures

Westcliff University - Irvine Campus:

The Westcliff University Emergency Response Team consists of members of the Facilities Department, Human Resources, Student Affairs, and the Office of the President. Members of this team are responsible for determining whether there is a significant emergency situation. As the head of the Emergency Response Team, and the designated Crisis Management Plan Manager, the Facilities Manager has primary responsibility for initiating emergency notifications and evacuation protocol when required and assigning staff members to specific emergency-related tasks as needed.

When making a determination of emergency, the Westcliff University Emergency Response team will consider the scope and imminence of the threat, as well as the credibility of the source and will consult with outside agencies and experts such as the Irvine Police Department, Crossroads Area Lieutenant, or Orange County Fire Authority as appropriate for the circumstances. This determination will be made after gathering available information and weighing the benefit and risk of a warning.

In life threatening situations 911 will always be called immediately, however, in situations where there is uncertainty of the severity of a threat or condition, Westcliff University will err on the side of caution and contact 911 and other local emergency services as needed.

In circumstances that require evacuation or adherence to a situation-specific crisis management plan is warranted an evacuation alarm will sound and emergency notifications will be disseminated as described in section 6.b of this ASR, direction on how to proceed and communication will be provided through the Emergency Response Team and any designated staff members assigned by the Crisis Management Plan Manager to help with the procedure.

Members of the Emergency Response Team have been trained on their designated duties during an evacuation.

The following evacuation routes are posted on each campus in the classrooms, conference rooms, lounge areas, campus hallways and near the entrance.



The evacuation assembly area for Westcliff University's Irvine Campus is the surface parking lot in front of the building facing Von Karman.

Some situations may require students and employees to shelter in place or may require a lock down of the facilities. In these events the Crisis Management Plan Manager will use a public address system and other forms of emergency notification to inform the campus community of the situation and provide immediate instructions.

Protocol found in Westcliff University's Crisis Management Plan will then be followed to keep the campus community safe until the situation is resolved. For an overview of what to do in different emergency situations please see Appendix C of this ASR.

Western State College of Law:

The Westcliff University Emergency Response Team oversees both the Westcliff University Irvine Campus and Western State College of Law (WSCL). This team is made up of members of the Westcliff University Facilities Department, Human Resources, Westcliff University Student Affairs Department, and the Office of the President. However the WSCL business manager and Senior Assistant Dean of Student Affairs are also

included in the emergency response decisions and procedures for the WSCL campus. Members of the Emergency Response Team along with the WSCL Business Manager And Senior Assistant Dean of Student Affairs are responsible for determining whether there is a significant emergency situation. As the head of the Emergency Response Team, and the designated Crisis Management Plan Manager, the Facilities Manager, has primary responsibility for initiating emergency notifications and evacuation protocol when required and assigning staff members to specific emergency-related tasks as needed.

When making a determination of emergency, the Emergency Response Team will consider the scope and imminence of the threat, as well as the credibility of the source and will consult with outside agencies and experts such as the Irvine Police Department, Crossroads Area Lieutenant, or Orange County Fire Authority as appropriate for the circumstances. The determination will be made after gathering available information and weighing the benefit and risk of a warning.

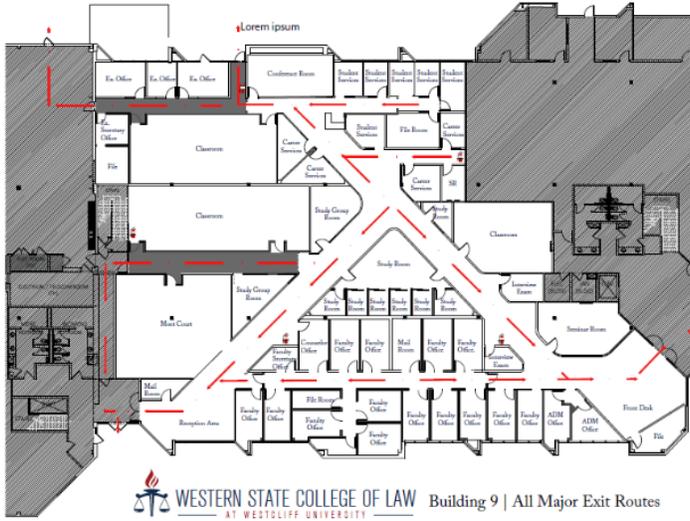
In life threatening situations 911 will always be called immediately, however, in situations where there is uncertainty of the severity of a threat or condition, WSCL will err on the side of caution and contact 911 and other local emergency services as needed.

If circumstances that require evacuation or adherence to a situation-specific crisis management plan is warranted an evacuation alarm will sound and emergency notifications will be disseminated as described in section 6.b of this ASR, direction on how to proceed and communication will be provided through the WSCL Business Manager and any designated staff members assigned by the Crisis Management Plan Manager to help with the procedure.

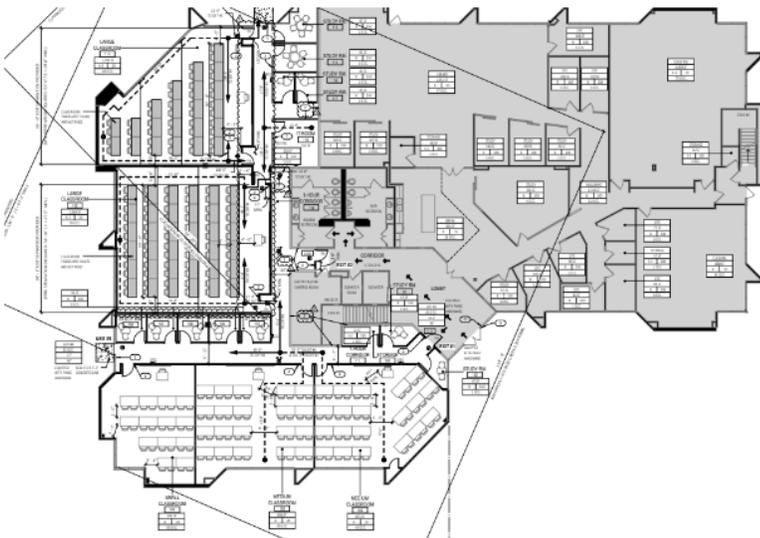
Members of the Emergency Response Team have been trained on their designated duties during an evacuation.

The following evacuation routes are posted on the WSCL campus, in the classrooms, library, conference rooms, lounge areas, campus hallways and near the entrance.

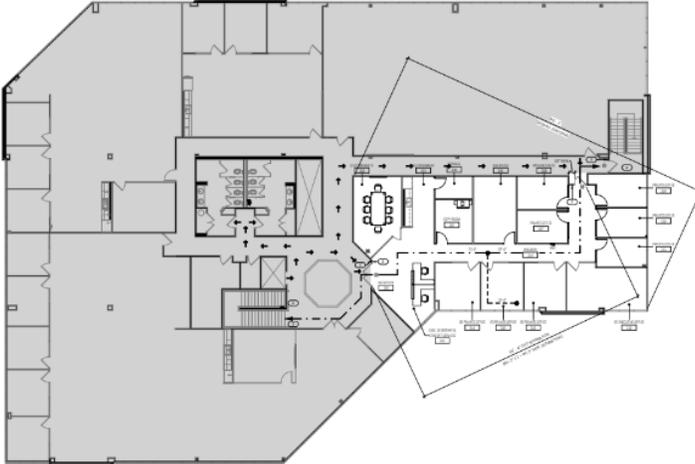
Western State College of Law Campus Evacuation Routes (Building 9)



Western State College of Law Campus Evacuation Routes (Building 8 first floor)



Westcliff University Campus Evacuation Routes VKCC (Building 8 second floor)



The evacuation assembly area for WSCL is the parking lot at the rear of the building.

Some situations may require students and staff to shelter in place or a lock down of the facilities. In these events the WSCL Business Manager will use a public address system and other forms of emergency notification to inform the campus community of the situation and provide immediate instructions.

Protocol found in Westcliff University's Crisis Management Plan will then be followed to keep the campus community safe until the situation is resolved. For an overview of what to do in different emergency situations please see Appendix C of this ASR.

Westcliff University - Miami Campus:

The Assistant Campus Director is responsible for determining whether there is a significant emergency situation, this includes primary responsibility for initiating emergency notifications and evacuation protocol when required.

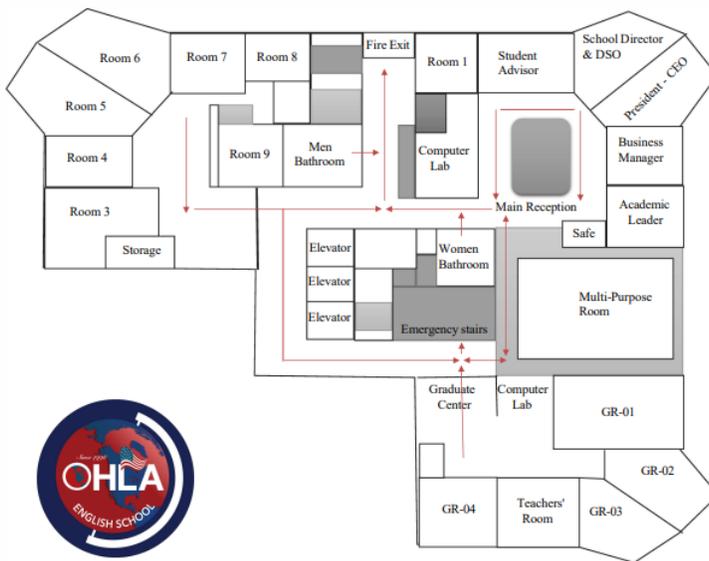
When making a determination of emergency, the Assistant Campus Director will consider the scope and imminence of the threat, as well as the credibility of the source and will consult with outside agencies and experts such as the Miami Police Department or City of Miami Fire Station 4 as appropriate for the circumstances. The determination will be made after gathering available information and weighing the benefit and risk of a warning.

In life threatening situations 911 will always be called immediately, however, in situations where there is uncertainty of the severity of a threat or condition, Westcliff University will err on the side of caution and contact 911 and other local emergency services as needed.

If circumstances that require evacuation or adherence to a situation-specific crisis management plan is warranted an evacuation alarm will sound and emergency notifications will be disseminated as described in section 6.b of this ASR, to provide direction on how to proceed. Communication will be provided through the Assistant Campus Director. The Miami Assistant Campus Director receives a report of an emergency, assesses the situation, and contacts the appropriate county emergency response units.

The Miami Assistant Campus Director has been trained on their designated duties during an evacuation.

The following evacuation routes are posted in each room in the campus and in all general areas



The evacuation assembly area for Westcliff University’s Miami Campus is the building lobby, where students, employees, and guests will be directed by an emergency response agency (police, fire department, or building security) to the appropriate exterior location.

Some situations may require students and staff to shelter in place or a lock down of the facilities. In these events the Kent Security Company, OHLA officials, or Westcliff University’s Assistant Campus Director will use a public announcement system and other forms of emergency notification to inform the campus community of the situation and provide immediate instructions.

Instructions from building management and local emergency services will then be followed to keep the campus community safe until the situation is resolved. For an overview of what to do in different emergency situations please see Appendix C of this ASR.

6.b Emergency Notifications

In the event of an emergency, Westcliff University will notify the appropriate members of its campus community as soon as it has confirmed that a significant emergency or dangerous situation exists. This determination will be made by the designated members of the Emergency Response Team as described in section 6.a of this ASR.

In these situations, any Westcliff University campus impacted by the emergency will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

The following sections summarize the process each Westcliff University campus will use to determine the content of emergency notifications and initiate the notification system to appropriate members of the campus community.

Westcliff University - Irvine Campus:

Westcliff University's Emergency Response Team, led by the Crisis Management Plan Manager will immediately notify the campus community upon confirmation of a significant emergency or dangerous situation occurring on the campus or that involves an immediate threat to the health or safety of students or employees. The Crisis Management Plan Manager will be responsible for determining when an emergency notification must be issued, the content contained in the notification, the appropriate segment of the campus to notify, and the way that notification will be sent and received. The designated Crisis Management Plan Manager will also be responsible for initiating the emergency response notification.

The current Crisis Management Plan Manager is the Westcliff University Facilities Manager.

The content contained within an Emergency Notification will be incident specific and will include instructions on how to prepare for impending danger. Additional information such as points of contact or status updates may also be released depending on the nature of the emergency.

When an event poses immediate danger to individuals of the campus community who are on campus at the time of the event. The Emergency Notification procedure will include contacting emergency services by dialing 911 and utilizing the Intersect building's alarm and public announcement system to instruct the campus community how to proceed and whether an evacuation, lock down, or shelter in place procedure is in effect.

Additional information may also be conveyed verbally to individuals on campus at the time of the emergency and through email and posted notices on or near the entrance of the campus.

Emergency notifications may be issued for a number of serious circumstances that may pose a current or imminent threat to students or employees of Westcliff University. These circumstances can include criminal activity or threats; danger caused by weather events or natural disasters; incidents such as gas leaks, fires, or electrical hazards; and outbreaks of contagious diseases.

Westcliff University's Emergency Response team and Crisis Management Plan Manager will keep the safety of the campus community at the forefront of their decision making process when determining how to best notify the campus of an emergency. The Crisis Management Plan Manager will also reach out to external community contact points as necessary to keep the larger community safe and to work with emergency service providers effectively in response to a dangerous situation. This may include notifying and working with the Hines Property Management team, OC Fire Authority, Irvine Police Department, and other key community agencies depending on the circumstance.

Western State College of Law:

Westcliff University's Emergency Response Team oversees both the Westcliff University Irvine Campus and Western State College of Law. The Emergency Response Team led by the Crisis Management Plan Manager along with the WSCL Business Manager and Senior Assistant Dean of Student Affairs will immediately notify the campus community upon confirmation of a significant emergency or dangerous situation occurring on the campus or that involves an immediate threat to the health or safety of students or employees. The Crisis Management Plan Manager and WSCL Business Manager will be responsible for determining when an emergency notification must be issued, the content contained in the notification, the appropriate segment of the campus to notify, and the way that notification will be sent and received. The designated Crisis Management Plan Manager and WSCL Business Manager will also be responsible for initiating the emergency response notification.

The current Crisis Management Plan Manager is the Westcliff University Irvine Campus Facilities Manager.

The content contained within an Emergency Notification will be incident specific and will include instructions on how to prepare for impending danger. Additional information such as points of contact or status updates may also be released depending on the nature of the emergency.

When an event poses immediate danger to individuals of the campus community who are on campus at the time of the event. The Emergency Notification procedure will include contacting emergency services by dialing 911 and utilizing the Von Karman Creative Campus building's alarm and public announcement system to instruct the campus community how to proceed and whether an evacuation, lock down, or shelter in place procedure is in effect.

Additional information may also be conveyed verbally to individuals on campus at the time of the emergency and through email and posted notices on or near the entrance of the campus.

Emergency notifications may be issued for a number of serious circumstances that may pose a current or imminent threat to students or employees of WSCL. These circumstances can include criminal activity or threats; danger caused by weather events or natural disasters; incidents such as gas leaks, fires, or electrical hazards; and outbreaks of contagious diseases.

Westcliff University's Emergency Response team and Crisis Management Plan Manager will keep the safety of the campus community at the forefront of their decision making process when determining how to best notify the campus of an emergency. The Crisis Management Plan Manager will also reach out to external community contact points as necessary to keep the larger community safe and to work with emergency service providers effectively in response to a dangerous situation. This may include notifying and working with the Von Karman Creative Campus building manager, OC Fire Authority, Irvine Police Department, and other key community agencies depending on the circumstance.

Westcliff University - Miami Campus:

The Miami Campus Assistant Campus Director will immediately notify the campus community upon confirmation of a significant emergency or dangerous situation occurring on the campus or that involves an immediate threat to the health or safety of students or employees. The Assistant Campus Director will be responsible for determining when an emergency notification must be issued, the content contained in the notification, the appropriate segment of the campus to notify, and the way that notification will be sent and received. The Assistant Campus Director will also be responsible for initiating the emergency response notification.

The content contained within an Emergency Notification will be incident specific and will include instructions on how to prepare for impending danger. Additional information such as points of contact or status updates may also be released depending on the nature of the emergency.

When an event poses immediate danger to individuals of the campus community who are on campus at the time of the event. The Emergency Notification procedure will include contacting emergency services by dialing 911 and utilizing the Four Ambassador Building's alarm and public announcement system to instruct the campus community how to proceed and whether an evacuation, lock down, or shelter in place procedure is in effect.

Additional information may also be conveyed verbally to individuals on campus at the time of the emergency and through email and posted notices on or near the entrance of the campus.

Emergency notifications may be issued for a number of serious circumstances that may pose a current or imminent threat to students or employees of Westcliff University. These circumstances can include criminal

activity or threats; danger caused by weather events or natural disasters; incidents such as gas leaks, fires, or electrical hazards; and outbreaks of contagious diseases.

Miami's Assistant Campus Director will keep the safety of the campus community at the forefront of their decision making process when determining how to best notify the campus of an emergency. The Assistant Campus Director will also reach out to external community contact points as necessary to keep the larger community safe and to work with emergency service providers effectively in response to a dangerous situation. This may include notifying and working with the Open Heart Language Academy (OHLA) school officials, the City of Miami Fire Station 4, the Miami Police Department, and other key community agencies depending on the circumstance.

6.c Evacuation Preparedness and Training

Westcliff University - Irvine Campus:

Westcliff University conducts emergency training, drills and tests at least annually. Tests may be announced or unannounced and focus on different emergency situations in coordination with various local emergency response agencies. A description of these practice exercises along with a record of the date, time and whether it was announced or unannounced is maintained by the Westcliff University Facilities Manager. Emergency response and evacuation procedures are publicized to the campus community in conjunction with these tests through email notification of safety procedures sent to the campus community at the conclusion of a test.

In addition to emergency drills and tests, Westcliff University Staff are required to attend an online training of emergency response and procedures within their first year of being hired. These trainings are scheduled by Human Resources on a rotational basis and conducted by the Westcliff University Facilities Manager. During the training the procedures for responding to various emergencies contained within the Crisis Management Plan are reviewed.

Students are made aware of Westcliff University's Emergency Response and Evacuation procedures through an email notification of the availability of this ASR as well as through the New Student Orientation.

Western State College of Law:

The emergency response and evacuation procedures Western State College of Law are publicized on an annual basis with an emailed distribution of a Student Crisis Management Plan which explains what to do in different emergency situations. This plan is also posted in each WSCL classroom. Emergency response and evacuation procedures are also provided on an annual basis to all students and staff through the dissemination of this report via email.

The campus emergency notification protocols and procedure are reviewed with each staff member at orientation and subsequently in staff and faculty meetings. Practice tests are conducted at least annually to assure effectiveness of the plan. A description of the practice test exercise along with a record of the date, time and whether it was announced or unannounced is maintained by the Business Manager/Director of

Facilities. Emergency response and evacuation procedures are publicized to the campus community in conjunction with these tests by email notifications sent to students at the conclusion of a test.

Westcliff University Miami Campus:

Westcliff University conducts emergency training, drills and tests at least annually. Tests may be announced or unannounced and focus on different emergency situations in coordination with various local emergency response agencies. A description of these practice exercises along with a record of the date, time and whether it was announced or unannounced is maintained by the Assistant Campus Director. Emergency response and evacuation procedures are publicized to the campus community in conjunction with these tests by email notifications sent to students at the conclusion of a test.

In addition to emergency drills and tests, Westcliff University staff are required to attend an online training of emergency response and procedures within their first year of being hired. These trainings are scheduled by Human Resources on a rotational basis and conducted by the Westcliff University Facilities Manager. During the training the procedures for responding to various emergencies contained within the Crisis Management Plan are reviewed.

Students are made aware of Westcliff University's Emergency Response and Evacuation procedures through an email notification of the availability of this ASR as well as through the New Student Orientation.

7. Security Awareness, Emergency Preparation, and Crime Prevention

This section provides an overview of the types of training and preparation in place to inform the Westcliff University Campus community, prevent crimes, and increase safety.

7.a Training Programs for Campus Security Procedures and Practices

Westcliff University - Irvine Campus:

Westcliff University facilitates multiple training programs to improve campus safety by informing students and staff of Westcliff University's security procedures and practices and encouraging members of the campus community to look out for themselves and one another to promote safety.

These programs include:

Staff Training:

- A review of Westcliff University's safety and security policy in employee handbook during staff onboarding process
- CPR training provided every two years in June
- Sexual harassment prevention training conducted every two years for current staff and provided to all new employees during the onboarding process

- Crisis Management Training provided to all new employees on a rotational basis but within the first year of being hired.
- Title IX Coordinator Trainings provided for designated staff members as needed
- Participation in emergency drills and tests at least once annually

Student Training:

- Title IX training to promote awareness, understanding, and compliance with Title IX regulations and foster a safe and inclusive environment at the University. Topics that are covered include the recognition and prevention of discrimination, harassment, and gender-based violence. These are conducted for all new students during New Student Orientation and provided as an online training module during a student's first session of enrollment as well as one to two times per year during the Spring term for student-athletes.
- Participation in emergency drills and tests at least once annually if on campus during scheduled event

Students and staff are also notified of safety and security procedures once a year through the publication of this Annual Security Report which is posted on the school website and publicized by email notification.

Western State College of Law:

All new Western State College of Law (WSCL) employees receive an Employee Handbook when onboarding. The Employee Handbook contains information related to crime awareness, prevention and campus security.

During the New Student Orientation process new students receive a Student Handbook containing information on campus security policies and procedures, suggestions on how to avoid becoming a crime victim, and procedures for reporting any criminal activity or emergency. Students and employees are encouraged to be responsible for their own security and the security of others.

In addition Western State College of Law provides presentations on campus safety and security quarterly. These presentations are open to all students, staff and faculty.

Westcliff University - Miami Campus:

Westcliff University facilitates multiple training programs to improve campus safety by informing students and staff Westcliff University's security procedures and practices and encouraging members of the campus community to look out for themselves and one another to promote safety.

These programs include:

Staff Training:

- A review of Westcliff University safety and security policy in employee handbook during staff onboarding process

- CPR training provided every two years in June
- Sexual harassment prevention training conducted every two years for current staff and provided to all new employees during the onboarding process
- Crisis Management Training provided to all new employees on a rotational basis but within the first year of being hired.
- Participation in emergency drills and tests at least once annually

Student Training:

- Title IX training to promote awareness, understanding, and compliance with Title IX regulations and foster a safe and inclusive environment at the University. Topics that are covered include the recognition and prevention of discrimination, harassment, and gender-based violence. These are conducted for all new students during New Student Orientation and provided as an online training module during a student's first session of enrollment.
- Participation in emergency drills and tests at least once annually if on campus during scheduled event

Students and staff are also notified of safety and security procedures once a year through the publication of this Annual Security Report which is posted on the school website and publicized by email notification.

7.b Crime Prevention Programs

Westcliff University - Irvine Campus:

Westcliff University provides training on topics related to crime prevention to students during their New Student Orientation and as a module training during their first session of class. These topics focus primarily on gender-based crimes but include topics like safe bystander intervention techniques, ways to stay safe within relationships, and techniques for addressing harassment.

Students are also directed to review the student catalog and handbook for information about crime prevention and reporting. Employees are provided with Westcliff University's Employee Handbook where information regarding Standards of Conduct and Safety can be found and receive sexual harassment training when first hired and every two years after. This training provides employees with information about what types of activities are considered harassment and how to respond in those situations to improve their awareness of rights and create a culture of accountability to reduce the likelihood of certain types of crime.

Western State College of Law:

Western State College of Law (WSCL) provides seminars and workshops designed to heighten awareness of crime and its prevention. Topics included in these informational programs are personal safety, living in a city, crime prevention, basic safety, and neighborhood watch programs.

Students are requested to review Western State College of Law's Catalog where sections discussing Crime Awareness and Campus Security and Student Conduct Policy can be found. Employees are requested to

review Westcliff University's Employee Handbook where information regarding Standards of Conduct and Safety can be found.

Westcliff University - Miami Campus :

Westcliff University provides training on topics related to crime prevention to students during their New Student Orientation and as a module training during their first session of class. These topics focus primarily on gender-based crimes but include topics like safe bystander intervention techniques, ways to stay safe within relationships, and techniques for addressing harassment.

Students are also directed to review the student catalog and handbook for information about crime prevention and reporting. Employees are provided with Westcliff University's Employee Handbook where information regarding Standards of Conduct and Safety can be found and receive sexual harassment training when first hired and every two years after. This training provides employees with information about what types of activities are considered harassment and how to respond in those situations to improve their awareness of rights and create a culture of accountability to reduce the likelihood of certain types of crime.

8. Violence Against Women (VAWA)

Westcliff University is committed to creating and maintaining a community in which students, faculty, and staff can work and be present in an atmosphere free from all forms of harassment, exploitation, or intimidation. This section of the ASR describes VAWA protections that way that Westcliff University addresses sexual violence on campus by protecting victim rights, holding fair disciplinary procedures, and providing training and awareness to the campus community.

8.a Definitions

Dating Violence, Domestic Violence, Sexual Assault and Stalking are prohibited by the Westcliff University and are incompatible with the institution's goal of providing a healthy educational environment for students, faculty, staff and guests.

The following definitions are used to define types of sexual violence for the purposes of the Clery Act and pertain to all Westcliff University Campuses.

Sexual offenses involve the physical contact of a sexual nature which is against one's will or without one's consent.

Consent requires a voluntary, positive agreement between the participants to engage in specific sexual activity.

Sexual activity that is non consensual would include, but is not limited to:

- nonconsensual sexual intercourse or penetration (vaginal, oral, or anal) by any means;
- nonconsensual sexual contact (any touching of intimate body parts with any body part or object without consent);

- sexual contact with a person while knowing or having reason to know that the person is incapacitated by any means including alcohol or other drugs.

Sexual violence can be perpetrated by a stranger or acquaintance. Both men and women can be victims or perpetrators.

- Domestic Violence - (i) A felony or misdemeanor crime of violence committed— (A) By a current or former spouse or intimate partner of the victim; (B) By a person with whom the victim shares a child in common; (C) By a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner; (D) By a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred, or (E) By any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.
- Dating Violence-Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. (i) The existence of such a relationship shall be 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. (ii) For the purposes of this definition— (A) Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. (B) Dating violence does not include acts covered under the definition of domestic violence.
- Sexual Assault - An offense that meets the definition of rape, fondling, incest, or statutory rape. Any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent. A. 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 incapacity. B. Incest—Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law. C. Statutory Rape—Sexual intercourse with a person who is under the statutory age of consent.
- Stalking (i) Engaging in a course of conduct directed at a specific person that would cause a reasonable person to— (A) Fear for the person’s safety or the safety of others; or (B) Suffer substantial emotional distress. (ii) For the purposes of this definition— (A) Course of conduct means two or more acts, including, but not limited to, acts 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. (B) Reasonable person means a reasonable person under similar circumstances and with similar identities to the victim. (C) Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

8.b Sexual Violence- Immediate Care and Preservation of Evidence

It is difficult to know what to do when a sexual assault has occurred, however, the steps that victims take immediately following a sexual assault or rape can make a significant difference in their options for pursuing a criminal charge at the time of the assault or in the future and making sure that their physical and emotional health is addressed. For this reason, the following recommended steps are provided.

Victims of sexual assault or rape should follow these recommended steps:

- Go to a safe place following the attack.
- Do not shower, bathe, or destroy any of the clothing you were wearing at the time of the attack. It is important that evidence be preserved for proof of a criminal offense or assistance in obtaining a protection order.
- Go to a hospital emergency room for medical care.
- A medical examination is the only way to ensure you are not injured and it could provide valuable evidence should you decide to prosecute. Even if you do not opt for forensic evidence collection, health care providers can still treat injuries and take steps to address concerns of pregnancy and/or sexually transmitted disease.
- Call someone to be with you; you should not be alone.
- You are also encouraged to preserve evidence by saving text messages, instant messages, social networking pages, other communications, and keeping pictures, logs or other copies of documents, if they have any, that would be useful to hearing boards/ investigators or police.

It is also recommended that victims call the Rape Crisis Hotline at 714-957-2737. It is available 24 hours a day and their counselors can help answer medical and emotional questions at any hour and in complete confidence.

If a student or employee is a victim of sexual assault or rape it is the student(s) option to notify the appropriate law enforcement authorities, including on-campus security authorities and local police. At the student's request, the institution will assist in notifying the proper authorities.

It is up to the victim whether or not they would like to report a sexual assault or rape, but it is important to remember that reporting sexual assault is not the same as prosecuting sexual assault. Victims are strongly encouraged to call the police to make the report. They may also make the report in person. If the victim requests, staff will assist the victim in notifying law enforcement authorities. If the victim needs additional counseling services beyond those identified in section 8.h of this ASR, Westcliff University will assist in identifying off-campus counseling or mental health services.

The sections below indicate contact information for students to report incidents of sexual violence to Westcliff University Staff or local law enforcement for each campus.

Westcliff University - Irvine Campus:

Students of Westcliff University's Irvine campus who are victims of sexual violence may contact the Dean of



Student Affairs at 949-825-5999 to report the assault or rape to the school or they may make a report with Irvine Police Department at 949-724-7000.

Employees of Westcliff University's Irvine campus who are victims of sexual violence may contact the Human Resources Department at 949-825-5999 to report the assault or rape to the school or they may make a report with Irvine Police Department at 949-724-7000.

Western State College of Law:

Students who would like to report an incidence of sexual violence to Western State College of Law can contact the Business Manager at 714-459-1167 or Senior Assistant Dean of Student Affairs at: 714-459-1117

Students who would like to report a sexual assault or rape to the police can contact the Irvine Police Department at 949-724-7000.

Employees of Western State College of Law who are victims of sexual violence may contact the Human Resources Department at 949-825-5999 to report the assault or rape to the school or they may make a report with Irvine Police Department at 949-724-7000.

Westcliff University Miami Campus:

Students who would like to report an incidence of sexual violence to Westcliff University's Miami Campus can contact the Assistant Campus Director at 786-798-9836

Students who would like to report a sexual assault or rape to the police can contact the Miami Police Department at 305-603-6640.

Employees of Westcliff University's Miami campus who are victims of sexual violence may contact the Human Resources Department at 949-825-5999 to report the assault or rape to the school or they may make a report with Miami Police Department at 786-798-9836.

8.c Procedures for Reporting and Responding to Reports of Sexual Misconduct

Westcliff University - Irvine Campus:

Any student may report cases of sexual misconduct to the Westcliff University Title IX coordinator by calling 949-825-5999 or emailing titleixcoordinator@westcliff.edu or Title IX deputy by calling 949-825-5999 or emailing titleixdeputy@westcliff.edu . Reports can be made in person, by mail, telephone, or e-mail.

A report can be made at any time, including during non-business hours. However, responses to reports made outside of business hours, including weekends and holidays, may be delayed.

More information about reporting sexual misconduct including dating violence, domestic violence, sexual assault, or stalking can be found in the Title IX handbook for students and Employee handbook for employees.

Students who have witnessed or experienced sexual misconduct or any other type of harassment or discriminatory behavior are encouraged to notify the University Title IX Coordinator as soon as possible.

Employees are encouraged to follow the procedures described in the Employee Handbook and report first to their direct supervisor or manager or to the Westcliff University Human Resources Department to file a report.

Victims of dating violence, domestic violence, sexual assault, and/or stalking are encouraged to file a report with both the institution and the local police. However, victims have the option of reporting to only the institution, only the police, or both and may request help from the Title IX coordinator or Human Resource Department with filing a police report.

Individuals should also be aware that certain University Officials such as Deans and Directors are designated Officials with Authority (OWAs) and are required to report any complaints relating to sexual misconduct to Westcliff University's Title IX Coordinator.

In cases of alleged dating violence, domestic violence, sexual assault, and/or stalking the University will keep confidential the identity of the Complainant, Respondent, and witnesses, except as may be permitted by FERPA, as required by law, or as necessary to carry out the Disciplinary Process described in section 8.e of this ASR.

Westcliff University will investigate allegations of sexual misconduct, but will respect the wishes of victims of misconduct to refrain from an investigation unless doing so would be deliberately indifferent or harmful to the University Community.

Westcliff University does not limit the time frame for reporting by student or employee for grievances related to sexual misconduct including domestic violence, dating violence, stalking or sexual assault as defined in section 8.a of this ASR, but a delay in reporting may impact the school's ability to take certain actions.

If an investigation is pursued, separate written notices will be provided to both parties involved which will inform them of pertinent details related to the investigation, and inform both parties that they may have an Advisor of their choice during the investigative proceedings.

Upon receipt of a formal report of sexual misconduct, Westcliff University will provide a timely and thorough investigation. Barring exigent circumstances, cases of Sexual Misconduct will generally be resolved within a 90 day period once the formal complaint has been filed. An extension of time may be necessary if witnesses are unavailable or uncooperative or due to other extenuating circumstances beyond the control of the investigator.

Greater detail about investigative and disciplinary procedures related to cases of alleged misconduct can be found in section 8.f of this ASR and the Title IX handbook.

Western State College of Law:

Any student may report cases of sexual misconduct to the WSCL Title IX coordinator by calling 714-459-1117 or emailing despinoza@wsulaw.edu . Reports can be made in person, by mail, telephone, or e-mail.

Employees are encouraged to follow the procedures described in the Employee Handbook and report first to their direct supervisor or manager or to the Westcliff University Human Resources Department.

A report can be made at any time, including during non-business hours. However, responses to reports made outside of business hours, including weekends and holidays, may be delayed.

More information about reporting sexual misconduct including dating violence, domestic violence, sexual assault, or stalking can be found in the WSCL Student Handbook for students and Westcliff University Employee handbook for employees.

Individuals who have experienced Sexual Misconduct & Relationship Violence are encouraged to talk to somebody at WSCL about what happened- so that they can get the support they need and WSCL can respond appropriately. However, different employees on campus have different abilities to maintain confidentiality:

CONFIDENTIAL REPORTING: Some individuals are required to maintain near complete confidentiality. These include professional counselors such as those provided by Talk One2One counseling services. These individuals can provide resources and generally talk to a victim without revealing any personally identifying information about an incident to the School. A victim can seek assistance and support from these individuals without triggering a School investigation.

NON-CONFIDENTIAL REPORTING. Other than professional counselors defined above, most other employees and contractors are required to report all the details of an incident to the Title IX coordinator. A report to these employees (called “responsible employees”) constitutes a report to the School and generally obligates the School to investigate the incident and take appropriate steps to address the situation. The following campus employees (or categories of employees) are examples of responsible employees: the Title IX Coordinator, all Deputy Title IX Coordinators, President, Director of Student Services, other Student Services staff, Academic Advisors, the Security Team (including contract security personnel), all full-time and adjunct Faculty, Human Resources, and Employee Relations.

WSCL will seek to protect the privacy and confidentiality of the individuals involved in any report of alleged Sexual Misconduct or Relationship Violence to the extent possible and allowed by law. The Title IX Coordinator will evaluate any request for confidentiality in the context of the WSCL’s responsibility to provide a safe and nondiscriminatory environment to all members of its community. WSCL will complete any publicly available record-keeping, including Clery Act reporting and disclosure, without the inclusion of identifying information about the alleged victim. It will also maintain as confidential any interim measures or remedies provided to the

alleged victim to the extent that maintaining confidentiality will not impair its ability to provide the interim measures or remedies.

In addition to internal reporting, WSCL strongly encourages anyone who believes they have experienced a sexual assault (or any other crime) to make a report to local law enforcement.

Although victims are strongly encouraged to report to local law enforcement, such a report is not a prerequisite to the WSCL's review and investigation of any formal complaint. WSCL will honor a victim's request not to report the matter to local law enforcement UNLESS there is a reasonable basis to believe that the safety and security of the campus community is at risk. If WSCLs must make a report, WSCL will endeavor to notify the victim of the institution's intent to report the matter to law enforcement in advance of any such report.

If an investigation is pursued, separate written notices will be provided to both parties involved which will inform them of pertinent details related to the investigation, and inform both parties that they may have an Advisor of their choice during the investigative proceedings.

WSCL does not limit the time frame for reporting by student or employee for grievances related to sexual misconduct including domestic violence, dating violence, stalking or sexual assault as defined in section 8.a of this ASR, but a delay in reporting may impact the school's ability to take certain actions.

Upon receipt of a formal report of sexual misconduct or relationship violence, WSCL will provide a timely and thorough investigation. Barring exigent circumstances, cases of Sexual Misconduct and Relationship Violence will generally be resolved within a 90 day period once a formal complaint has been filed. An extension of time may be necessary if witnesses are unavailable or uncooperative or due to other extenuating circumstances beyond the control of the investigator.

Greater detail about investigative and disciplinary procedures related to cases of alleged misconduct can be found in section 8.f of this ASR and Student or Employee Handbook.

Westcliff University Miami Campus :

Any student may report cases of sexual misconduct to the Westcliff University Title IX coordinator by calling 949-825-5999 or emailing titleixcoordinator@westcliff.edu or Title IX deputy by calling 949-825-5999 or emailing titleixdeputy@westcliff.edu. Reports can be made in person, by mail, telephone, or e-mail.

A report can be made at any time, including during non-business hours. However, responses to reports made outside of business hours, including weekends and holidays, may be delayed.

More information about reporting sexual misconduct including dating violence, domestic violence, sexual assault, or stalking can be found in the Title IX handbook for students and Employee handbook for employees.

Students who have witnessed or experienced sexual misconduct or any other type of harassment or discriminatory behavior are encouraged to notify the University Title IX Coordinator as soon as possible.

Employees are encouraged to follow the procedures described in the Employee Handbook and report first to their direct supervisor or manager or to the Westcliff University Human Resources Department to file a report.

Victims of dating violence, domestic violence, sexual assault, and/or stalking are encouraged to file a report with both the institution and the local police. However, victims have the option of reporting to only the institution, only the police, or both and may request help from the Title IX coordinator or Human Resource Department with filing a police report.

Individuals should also be aware that certain University Officials such as Deans and Directors are designated Officials with Authority (OWAs) and are required to report any complaints relating to sexual misconduct to Westcliff University's Title IX Coordinator.

In cases of alleged dating violence, domestic violence, sexual assault, and/or stalking the University will keep confidential the identity of the Complainant, Respondent, and witnesses, except as may be permitted by FERPA, as required by law, or as necessary to carry out the Disciplinary Process described in section 8.e of this ASR.

Westcliff University will investigate allegations of sexual misconduct, but will respect the wishes of victims of misconduct to refrain from an investigation unless doing so would be deliberately indifferent or harmful to the University Community.

Westcliff University does not limit the time frame for reporting by student or employee for grievances related to sexual misconduct including domestic violence, dating violence, stalking or sexual assault as defined in section 8.a of this ASR, but a delay in reporting may impact the school's ability to take certain actions.

If an investigation is pursued, separate written notices will be provided to both parties involved which will inform them of pertinent details related to the investigation, and inform both parties that they may have an Advisor of their choice during the investigative proceedings.

Upon receipt of a formal report of sexual misconduct, Westcliff University will provide a timely and thorough investigation. Barring exigent circumstances, cases of Sexual Misconduct will generally be resolved within a 90 day period from when a formal complaint has been filed. An extension of time may be necessary if witnesses are unavailable or uncooperative or due to other extenuating circumstances beyond the control of the investigator.

Greater detail about investigative and disciplinary procedures related to cases of alleged misconduct can be found in section 8.f of this ASR and the Title IX handbook.

8.d Victims Rights and Privacy

Confidentiality is always important. However when cases of alleged domestic violence, dating violence, sexual assault, or stalking are reported, privacy concerns can impact the safety and wellbeing of the victim. In order to protect victims of these types of crimes, Section 40002(a) of the Violence Against Women Act of 1994 has defined personally identifiable information as “individually identifying information for or about an individual, including information likely to disclose the location of a victim of domestic violence, dating violence, sexual assault, or stalking, regardless of whether the information is encoded, encrypted, hashed or otherwise protected.” This information may not always correspond with personally identifiable information as defined by other privacy legislation such as FERPA, HEA, or the Privacy Act, however, institutions should not include personally identifiable information as defined by VAWA for victims of sexual violence on any publicly accessible document including the campus crime log.

Westcliff University - Irvine Campus:

Westcliff University recognizes the importance of upholding confidentiality for victims of sexual violence, while simultaneously acknowledging the importance of keeping adequate records of reports and disclosing information to appropriate internal and external authorities when necessary to provide accommodations, protective measures, and follow legal requirements for reporting crimes and keeping the campus safe.

In order to maintain victim privacy and uphold their responsibilities for required reporting and campus safety, Westcliff University does not include any personally identifiable information in the campus crime log. When a report is filed with a CSA, sufficient information is recorded to identify the corresponding crime log entry and fulfill any required reporting criteria mandated by local law enforcement. This report is kept private and is accessible only to the Westcliff University Facilities Manager, the Senior Director of Human Resources, and the Dean of Student Affairs.

If information must be disclosed to third party agencies to accommodate victims or due to legal or safety mandates, the Westcliff University Title IX coordinator will be responsible for evaluating the risks and benefits of disclosure and releasing the appropriate amount of information to the appropriate parties for students and the Senior Director of Human Resources will be responsible for the same decision when it involves employees. Only information that is necessary to fulfill the duties listed above will be released and victims will be notified of what information has been released and to which parties.

Westcliff University’s internal policy includes the mandatory reporting of sexual violence against students by Officials With Authority (OWAs) to the Title IX coordinator. Students may ask a university official whether or not they are an OWA before deciding whether or not to disclose information to them. Additionally, students and employees can report circumstances directly to the Title IX coordinator or Human Resources to help ensure confidentiality is maintained.

In addition to taking necessary measures to protect the privacy of victims of sexual violence, Westcliff University's Title IX Coordinator or Senior Director of Human Resources will provide students or employees who report that they are victims of sexual violence (including domestic violence, dating violence, sexual assault, and stalking), whether the reported act took place on or off campus, with a written document outlining the victims rights and options.

Westcliff University will also take the necessary measures, within reason, to comply with any protection orders, no-contact orders, restraining orders or similar lawful orders issued by a criminal, civil or tribal court which Westcliff University becomes aware.

Western State College of Law:

Western State College of Law (WSCL) will seek to protect the privacy and confidentiality of the individuals involved in any report of alleged Sexual Misconduct or Relationship Violence to the extent possible and allowed by law. The Title IX Coordinator or Senior Director of Human Resources will evaluate any request for confidentiality in the context of WSCL's responsibility to provide a safe and nondiscriminatory environment to all members of its community.

WSCL will complete any publicly available record-keeping, including Clery Act reporting and disclosures, and crime log entries without the inclusion of identifying information about the alleged victim. It will also maintain as confidential any interim measures or remedies provided to the alleged victim to the extent that maintaining confidentiality will not impair its ability to provide the interim measures or remedies.

If a report about a crime is filed with a CSA, sufficient information is recorded to identify the corresponding crime log entry and fulfill reporting criteria mandated by local law enforcement. However, this report is kept private and is accessible only to the WSCL Senior Assistant Dean of Student Affairs, WSCL Business Manager, and the Westcliff University Senior Director of Human Resources.

Students should be aware that while some individuals are required to maintain near complete confidentiality (this includes professional counselors), most WSCL employees and contractors are required to report the details of a report of sexual violence to the Title IX coordinator. The following employees are examples of WSCL employees who are required to report: all Deputy Title IX Coordinators, President, Director of Student Services, Student Services staff, Academic Advisors, the Security team, all full-time and adjunct Faculty, and Human Resources.

The WSCL Title IX Coordinator or Senior Director of Human Resources will provide students or employees who report that they are victims of sexual violence (including domestic violence, dating violence, sexual assault, and stalking) with a written document outlining the victims rights and options. This document is provided regardless of the location in which the event occurred.

WSCL will also take the necessary measures, within reason, to comply with any protection orders, no-contact orders, restraining orders or similar lawful orders issued by a criminal, civil or tribal court which Westcliff University becomes aware.

Westcliff University - Miami Campus:

Westcliff University recognizes the importance of upholding confidentiality for victims of sexual violence, while simultaneously acknowledging the importance of keeping adequate records of reports and disclosing information to appropriate internal and external authorities when necessary to provide accommodations, protective measures, and follow legal requirements for reporting crimes and keeping the campus safe.

Westcliff University does not currently have a security department at its Miami campus. The building security is provided by the building owner and is not under Westcliff University authority. Therefore, Westcliff University does not keep a crime log for its Miami campus though the security agency may have its own standard of tracking criminal activity in and around the campus.

When a report is filed with the Miami Campus Assistant Campus Director, sufficient information is recorded to fulfill any required reporting criteria mandated by local law enforcement and provide statistical data free from identifiable information to the Facilities department at the Westcliff University Irvine campus so that it can be compiled for Clery Act Crime reporting as provided in section 10 of this ASR. These reports are kept private and are accessible only to the Miami Campus Assistant Director and Westcliff University Main (Irvine) Campus Dean of Student Affairs or Senior Director of Human Resources.

If information must be disclosed to third party agencies to accommodate victims or due to legal or safety mandates, the Title IX coordinator will be responsible for evaluating the risks and benefits of disclosure and releasing the appropriate amount of information to the appropriate parties for students and the Senior Director of Human Resources will be responsible for the same decision when it involves employees. Only information that is necessary to fulfill the duties listed above will be released and victims will be notified of what information has been released and to which parties.

Westcliff University's internal policy includes the mandatory reporting of sexual violence against students by Officials With Authority (OWAs) to the Title IX coordinator. Students may ask a university official whether or not they are an OWA before deciding whether or not to disclose information to them. Additionally, students and employees can report circumstances directly to the Title IX coordinator or Human Resources to help ensure confidentiality is maintained.

In addition to taking necessary measures to protect the privacy of victims of sexual violence, the Miami Campus Assistant Campus Directory, Main (Irvine) Campus Title IX Coordinator or Senior Director of Human Resources will provide students or employees who report that they are victims of sexual violence (including domestic violence, dating violence, sexual assault, and stalking), whether the reported act took place on or off campus, with a written document outlining the victims rights and options.

Westcliff University will take the necessary measures, within reason, to comply with any protection orders, no-contact orders, restraining orders or similar lawful orders issued by a criminal, civil or tribal court which Westcliff University becomes aware.

8.e Disciplinary Proceedings and Sanctions

Westcliff University - Irvine Campus:

The Title IX Coordinator for Westcliff University's Irvine campus is: April Vuong, Dean of Student Affairs.

Victims of sexual violence are not required to file a formal complaint or pursue disciplinary action, however, the Westcliff University Title IX coordinator will follow up with reports made by students and explain the process for filing a formal complaint, if the student wishes to do so. The Human Resources department will follow up on reports made by employees and explain the process for filing a formal grievance if the employee chooses to do so. Formal complaints/grievances can be submitted either electronically or in hardcopy and will be used to initiate an investigation into a report of misconduct.

Students and employees can expect investigations and disciplinary proceedings to be completed within around 90 days, however, an extension of time may be granted for good cause, with written notice to the accuser and the accused of the delay and reason for the delay. When cases involve students, The Title IX coordinator will determine whether a request for a delay from either party is sufficient and will inform both parties of delays caused due to circumstances outside either party or the institution's control. If cases involve employees the Senior Director of Human Resources will determine whether a request for a delay from either party is sufficient and will inform both parties of delays caused due to circumstances outside either party or the institution's control. If a case involves both students and employees the Title IX coordinator and Senior Director of Human Resources will work together as a joint commission on all parts of the investigation. If a complainant or respondent needs to request an extension of time at any point in the investigative or disciplinary process either they or their advisor should contact the Westcliff University Title IX coordinator or the Senior Director of Human Resources as soon as possible to make the request.

Disciplinary actions cannot be taken for reports of sexual violence including domestic violence, dating violence, sexual assault, or stalking until after an investigation has been conducted. Westcliff University will review allegations of sexual misconduct using a prompt, fair and impartial process from the initial investigation to the final result.

Students and employees who are involved in such an investigation as either the complainant or the respondent will receive a notice of investigation which will include details of the allegations (including identities of the parties involved, specific section of the policy alleged to have been violated, the conduct that would be considered sexual violence, the date of the incident(s) and the location of the incident(s)); a statement that the Respondent is presumed to be not responsible for the alleged conduct until determination is made according to

the University's Grievance Process; a statement that the Parties may have an Advisor of their choice; and a reminder of the expectation of truthfulness including consequences for submitting false information.

The Parties will also be provided with separate written notice of any investigative interview, meeting or hearing. Interview/meeting notices will include the date, time, location, participants and purpose of the investigative interview or meeting. Both parties will be provided their notice simultaneously, in most cases the notification will be sent 3-5 days prior to the meeting/interview to ensure that they have equal information about and access to the interview/meeting. In emergency situations the meeting may be sooner than 3 days.

During the investigation, the Title IX Coordinator, the Senior Director of Human Resources or his/her designee ("Investigator") will conduct interviews and gather evidence. Investigations will be conducted either in person or remote via zoom meetings. No unauthorized audio or video recordings of any kind are permitted during investigation, but if the interviewees provide consent, meetings will be recorded for documentation purposes. The Parties will be provided an equal opportunity to present facts and witnesses or other evidence.

The Parties (and their Advisors) will be provided with evidence directly related to the allegations, in electronic format or hardcopy, with at least 10 days for the Parties to inspect, review, and respond to the evidence. The Investigator will consider the responses received from the Parties before issuing the investigative report. Once the investigation has concluded, the Investigator will draft an investigative report (hardcopy or electronic) that fairly summarizes relevant evidence. The investigative report will be sent to the Parties (and their Advisors) at least 10 days prior to a Live Hearing. The Parties may provide a written response to the investigative report.

Informal Resolution

If the Complainant and Respondent voluntarily consent in writing, Formal Complaints can be resolved through Informal Resolution, such as mediation.

The Title IX Coordinator or Senior Director of Human Resources will coordinate an appropriate Informal Resolution process depending on the nature of the allegations, the Parties involved, and the overall circumstances.

Informal Resolution will be conducted by a facilitator, who may or may not be the Title IX Coordinator or member of the Human Resource Department. It is not necessary to pursue Informal Resolution first in order to pursue the University's Grievance Process. At any time prior to agreeing to a resolution, any party has the right to withdraw from the Informal Resolution process and resume the Grievance Process.

Informal Resolution is unavailable to resolve allegations that an employee sexually harassed a student.

The timeframe for an Informal Resolution will vary depending on the circumstances but can take up to 90 days or longer with extenuating circumstances.

Live Hearing

If a Formal Complaint is not or cannot be resolved through Informal Resolution, the University will conduct a Live Hearing.

Live Hearings are facilitated by a designated Decision Maker, separate from the Title IX Coordinator, the Senior Director of Human Resources, or Investigator. The Decision Maker will be selected by the Title IX Coordinator and/or the Senior Director of Human Resources. When selecting the Decision Maker, the Title IX Coordinator will make sure that the Decision Maker does not have a conflict of interest for or against the accuser or the accused. In order to qualify as a Decision Maker, the individual must also receive annual trainings on issues related to dating violence, domestic violence, sexual assault, stalking and ways to conduct an investigation and hearing process that protects the safety of the victim and promotes accountability. This training is provided by a third party training company.

Live Hearings will be conducted directly, orally, and in real time. Both parties will be allowed to select an advisor of their own choosing. However, advisors should conduct themselves professionally and may be removed at the discretion of The Decision Maker, should they become disruptive. The Decision Maker will permit each party's Advisor to ask the other party and any witnesses all relevant questions and follow-up questions, including those challenging credibility. Questions are asked only by Advisors and not by parties. Only relevant cross-examination and other questions may be asked of a party or witness. Before a Complainant, Respondent, or witness answers a cross-examination or other question, the Decision Maker must first determine whether the question is relevant and explain to the party's Advisor asking cross-examination questions any decision to exclude a question as not relevant.

Rape shield protections are applied to Complainants, deeming irrelevant questions and evidence about a Complainant's prior sexual behavior unless offered to prove that someone other than the Respondent committed the alleged Sexual Harassment or offered to prove consent. If a party or witness does not submit to cross-examination at the Live Hearing, the Decision-Maker will not rely on any statement of that party or witness in reaching a determination regarding responsibility. The Decision Maker will not draw an inference about the determination regarding responsibility based solely on a party's or witness's absence from the Live Hearing or refusal to answer cross-examination or other questions. At the request of either party, the University will provide for the entire Live Hearing (including cross-examination) to occur with the Parties located in separate rooms with technology enabling the Parties to see and hear each other.

Live Hearings may be conducted with all Parties physically present in the same geographic location or, at the University's discretion, any or all Parties, witnesses, and other participants may appear at the Live Hearing virtually.

An audio or audiovisual recording, or transcript, of any Live Hearing will be created and maintained by the University for seven (7) years. During the Grievance Process, the University will not use, rely on or seek

disclosure of information protected under a legally recognized privilege, unless the person holding such privilege has waived the privilege. The University will not access or use a party's medical, psychological, and similar treatment records unless the party provides voluntary, written consent.

Living Hearings can be expected to take around 1-3 days.

The standard of evidence For all Formal Complaints of Sexual Harassment (including where employees are Respondents), the University utilizes the preponderance of the evidence standard, which means "more likely than not."

Prior to or during an investigation, the University will provide interim measures, as necessary. Interim measures are individualized services offered, as appropriate, to either or both the reporting and responding parties involved in an alleged incident of Sexual Misconduct and may include: counseling, extensions of time or other course-related adjustments, modifications to work or class schedules, campus escort services, restrictions on contact between the parties, leave of absence, increased security and monitoring of certain areas on campus, and other similar accommodation. Interim measures should be individualized and appropriate based on the information gathered by the Title IX Coordinator and/ or the Senior Director of Human Resources, making every effort to avoid depriving any student of her or his education or employee of their ability to maintain career stability and compensation. The measures needed by each party may change over time, and the Title IX Coordinator or Human Resource Director should communicate with each student or employee throughout the investigation to ensure that any interim measures are necessary and effective based on the individual's evolving needs.

Following a determination of responsibility, appropriate corrective action will be taken, and the University will take steps to prevent recurrence. Disciplinary Actions taken will be determined on a case-by-case basis. Factors considered when determining Disciplinary Action may include but are not limited to: Nature, severity of, and circumstances surrounding the violations(s); Respondent's disciplinary history; Previous allegations or allegations involving similar conduct; Need for disciplinary action to bring an end/prevent future recurrence of the violation; Need for disciplinary action to remedy the effects on the Complainant and the University community; Impact on the parties; Any other information deemed relevant by the Decision-Maker.

Disciplinary Action include, but are not limited to, additional training, a restriction on contact, warning, suspension, or termination. Failure to abide by imposed Disciplinary Actions (whether by refusal, neglect or any other reason), may result in additional Disciplinary Action, including suspension or termination.

The following list gives a general breakdown of the types of disciplinary actions that could be applied to the four main VAWA protected categories of crime. For more detailed information about potential disciplinary actions reach out the Title IX Coordinator or Senior Director of Human resources:

- 1. Domestic Violence:**

- a. Students: depending on the nature, severity, and other circumstances related to the act of domestic violence students may receive one or more of the following disciplinary actions:
 - i. written warnings with a list of consequences that will be enforced upon recurrence of the violation,
 - ii. mandatory relationship and/or anger management training,
 - iii. mandatory counseling,
 - iv. restrictions on contact including the potential requirement to change classes or learning modalities and prohibitions on participating in additional school activities including participation in athletics,
 - v. suspension from any and all Westcliff University Activities for up to 1 semester (3 months) or more,
 - vi. expulsion from all Westcliff University programs.
- b. Employees: depending on the nature, severity, and other circumstances related to the act of domestic violence employees may receive one or more of the following disciplinary actions:
 - i. written warnings with a list of consequences that will be enforced upon recurrence of the violation,
 - ii. mandatory relationship and/or anger management training,
 - iii. mandatory counseling,
 - iv. restrictions on contact including the potential requirement to change departments, work duties, or work schedule and prohibitions on attending external work activities including team building activities, retreats, student-events, and conferences,
 - v. Disciplinary leave or suspension without pay up to 3 months,
 - vi. demotion
 - vii. termination of employment at Westcliff University.

2. **Dating Violence:**

- a. Students: depending on the nature, severity, and other circumstances related to the act of dating violence students may receive one or more of the following disciplinary actions:
 - i. written warnings with a list of consequences that will be enforced upon recurrence of the violation,
 - ii. mandatory relationship and/or anger management training,
 - iii. mandatory counseling,
 - iv. restrictions on contact including the potential requirement to change classes or learning modalities and prohibitions on participating in additional school activities including participation in athletics,
 - v. suspension from any and all Westcliff University Activities for up to 1 semester (3 months) or more,
 - vi. expulsion from all Westcliff University programs.
- b. Employees: depending on the nature, severity, and other circumstances related to the act of dating violence employees may receive one or more of the following disciplinary actions:
 - i. written warnings with a list of consequences that will be enforced upon recurrence of the violation,

- ii. mandatory relationship and/or anger management training,
- iii. mandatory counseling, restrictions on contact including the potential requirement to change departments, work duties, or work schedule and prohibitions on attending external work activities including team building activities, retreats, student-events, and conferences
- iv. disciplinary leave or suspension without pay up to 3 months,
- v. demotion,
- vi. termination of employment at Westcliff University.

3. Stalking:

- a. Students: depending on the nature, severity, and other circumstances related to the act of stalking, students may receive:
 - i. written warnings with a list of consequences that will be enforced upon recurrence of the violation, mandatory harassment,
 - ii. mandatory training on harassment, Westcliff University's Code of Conduct and social behavior expectations, or other related training,
 - iii. mandatory counseling,
 - iv. restrictions on contact including the potential requirement to change classes or learning modalities and prohibitions on participating in additional school activities including participation in athletics,
 - v. suspension from any and all Westcliff University Activities for up to 1 semester (3 months) or more.
- b. Employees: depending on the nature, severity, and other circumstances related to the act of stalking employees may receive one or more of the following disciplinary actions:
 - i. written warnings with a list of consequences that will be enforced upon recurrence of the violation,
 - ii. mandatory training on harassment, Westcliff University's Code of Conduct and acceptable social behavior, or other related training,
 - iii. mandatory counseling,
 - iv. restrictions on contact including the potential requirement to change departments, work duties, or work schedule and prohibitions on attending external work activities including team building activities, retreats, student-events, and conferences,
 - v. disciplinary leave or suspension without pay up to 3 months,
 - vi. demotion
 - vii. termination of employment at Westcliff University.

4. Sexual Assault:

- a. Students: depending on the nature, severity, and other circumstances related to the act of sexual assault students may receive:
 - i. written warnings with a list of consequences that will be enforced upon recurrence of the violation,
 - ii. mandatory harassment or related training,
 - iii. mandatory counseling,

- iv. restrictions on contact including the potential requirement to change classes or learning modalities and prohibitions on participating in additional school activities including participation in athletics,
 - v. suspension from any and all Westcliff University Activities for up to 1 semester (3 months) or more,
 - vi. expulsion from all Westcliff University programs.
- b. Employees: depending on the nature, severity, and other circumstances related to the act of sexual assault employees may receive one or more of the following disciplinary actions:
- i. written warnings with a list of consequences that will be enforced upon recurrence of the violation,
 - ii. mandatory harassment or related training,
 - iii. restrictions on contact including the potential requirement to change departments, work duties, or work schedule and prohibitions on attending external work activities including team building activities, retreats, student-events, and conferences,
 - iv. disciplinary leave or suspension without pay up to 3 months,
 - v. demotion
 - vi. termination of employment at Westcliff University.

The Decision-Maker will issue a Written Determination regarding responsibility with findings of fact, conclusions about whether the alleged conduct occurred, rationale for the result as to each allegation, a description of the procedure from Formal Complaint through the Live Hearing, Disciplinary Actions imposed on the Respondent and whether Remedies will be provided to the Complainant.

The determination will be sent simultaneously to the Parties along with information on how to file an appeal.

Both Parties have the right to appeal a determination regarding responsibility, the University's dismissal of a Formal Complaint or any allegations therein if: (1) procedural irregularity affected the outcome of the matter; (2) there is newly discovered evidence that could affect the outcome of the matter; and/or (3) Title IX personnel or the Senior Director of Human Resources had a conflict of interest or bias, that affected the outcome of the matter. An appeal must be submitted in writing to the Title IX Coordinator or the Senior Director of Human Resources within 15 days of the delivery of the Written Determination.

If a result changes due to an appeal, additional evidence or any other reason both parties will be simultaneously sent an additional written notice describing the new result and reason for the change.

In situations where an alleged victim is deceased as a result of a crime or offense, the next of kin will be treated as the alleged victim and receive the Written Determination in the victim's place.

Remedies are provided to a Complainant whenever a Respondent is found responsible. Remedies are implemented by the Title IX Coordinator or Senior Director of Human Resources and may be disciplinary and punitive. Remedies are designed to maintain the Complainant's equal access to education or employment.

Remedies will be determined on a case-by-case basis and may include supportive measures. Individuals who make a materially false statement in bad faith in the course of a Grievance Process will be subject to the University's Student Code of Conduct and/or Employee Handbook as it relates to Standard Code of Conduct.

Western State College of Law:

The Title IX Coordinator for Western State College of Law (WSCL) is: Donna Espinoza, Senior Assistant Dean of Student Affairs.

WSCL encourages students and employees who have been the victim of Sexual Misconduct or Relationship Violence to come forward. Students should not be discouraged from reporting such incidents because they fear discipline for their own violations of the Student Code of Conduct, such as use of alcohol at a school event. Therefore, WSCL has discretion not to pursue other violations of the Student Code of Conduct that occurred in the context of the reported incident of Sexual Misconduct or Relationship Violence.

Students are encouraged to report any incident of Sexual Misconduct or Relationship Violence to the WSCL Title IX Coordinator. Employees are encouraged to report any incident of Sexual Misconduct or Relationship Violence to the Senior Director of Human Resources. If a report is made verbally, WSCL will request a written statement. This may be submitted electronically or as a physical document.

Upon receipt of a report, WSCL will generally proceed as described below.

WSCL will provide a timely and thorough investigation. Barring exigent circumstances, cases of Sexual Misconduct and Relationship Violence will generally be resolved within a 60 day period once the incident has been reported. An extension of time may be granted for good cause, with written notice to the accuser and the accused of the delay and reason for the delay. When cases involve students, the Title IX coordinator will determine whether a request for a delay from either party is sufficient and will inform both parties of delays caused due to circumstances outside either party or the institution's control. If cases involve employees the Senior Director of Human Resources will determine whether a request for a delay from either party is sufficient and will inform both parties of delays caused due to circumstances outside either party or the institution's control.

If a case involves both students and employees the Title IX coordinator and Senior Director of Human Resources will work together as a joint commission on all parts of the investigation. If a complainant or respondent needs to request an extension of time at any point in the investigative or disciplinary process either they or their advisor should contact the WSCL Title IX coordinator or the Senior Director of Human Resources as soon as possible to make the request.

Once the School is put on notice of possible Sexual Misconduct and Relationship Violence, the Complainant will be offered appropriate confidential support, accommodations, and other resources and will be notified of applicable policies and procedures. Accommodations include the ability to change work schedules, to alter

academic schedules, to withdraw from/retake a class without penalty, and to access academic support. The Respondent also will be offered appropriate resources and notified of applicable policies and procedures.

On-campus disciplinary procedures against students will be in accordance Western State College of Law's published Sexual Misconduct & Relationship Violence Policy & Procedures for Resolving Complaints Affecting Students, which are prompt, fair, and impartial from the initial investigation to the final result. Students and employees who are involved in such an investigation as either the complainant or the respondent will receive a notice of investigation which will include details of the allegations (including identities of the parties involved, specific section of the policy alleged to have been violated, the conduct that would be considered sexual violence, the date of the incident(s) and the location of the incident(s)); a statement that the Respondent is presumed to be not responsible for the alleged conduct until determination is made according to the University's Grievance Process; a statement that the Parties may have an Advisor of their choice; and a reminder of the expectation of truthfulness including consequences for submitting false information..

Pending a final determination, the Title IX Coordinator and/or Senior Director of Human Resources will take appropriate Interim Measures. Interim Measures are individualized services offered, as appropriate, to either or both the reporting and responding parties involved in an alleged incident of Sexual Misconduct and may include: counseling, extensions of time or other course-related adjustments, modifications to work or class schedules, campus escort services, restrictions on contact between the parties, leave of absence, increased security and monitoring of certain areas on campus, and other similar accommodation.

Interim Measures should be individualized and appropriate based on the information gathered by the Title IX Coordinator and/ or the Senior Director of Human Resources, making every effort to avoid depriving any student of her or his education or employee of their ability to maintain career stability and compensation. The measures needed by each party may change over time, and the Title IX Coordinator or Human Resource Director should communicate with each student or employee throughout the investigation to ensure that any interim measures are necessary and effective based on the individual's evolving needs.

The investigation will generally be conducted by an investigator assigned by the WSCL Title IX coordinator if the investigation involves students. If the investigation involves a faculty or staff member, the investigation will be conducted by an investigator assigned by the Senior Director of Human Resources. If the investigation involves both students and employees the investigator will be selected by both the Title IX coordinator and the Senior Director of Human Resources. The investigator will receive annual training related to domestic violence, dating violence, sexual assault, and stalking as well as how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability. The investigator will separately interview the Complainant and Respondent. Both parties will be able to provide evidence and suggest other witnesses to be interviewed. The investigator will interview other relevant witnesses and review any other available relevant evidence. Both the Complainant and Respondent can have another individual present during their own respective interviews. If the Complainant or Respondent elects, they may have an attorney present during their own interview, but said attorney may not advocate during the interview.

The investigator will present all evidence to the Title IX Coordinator. The Title IX Coordinator will be appropriately trained regarding handling and considering sexual misconduct and relationship violence cases.

The Title IX Coordinator will weigh the evidence presented and decide whether additional evidence is necessary for consideration. The Title IX Coordinator will determine whether it is more likely than not that a violation occurred. The standard of evidence that will be used is preponderance of the evidence. This is a burden of proof in which it is determined to be more likely than not, or at least 51% certain, that the violation has in fact occurred.

The institution reserves the right to convene a Determination Panel to review the evidence and make the determination in appropriate circumstances.

If the investigation involves an employee, the investigator will present all evidence to the Human Resources Department. Human Resources is appropriately trained regarding handling and adjudicating sexual misconduct and relationship violence cases. Human Resources will weigh the evidence presented and make a determination of whether a violation of the Sexual Misconduct & Relationship Violence Policy or any other policy has occurred.

If Western State College of Law determines that sexual violence may have occurred, the institution will take steps proactively designed to promptly and effectively end the sexual violence or the threat of sexual violence, prevent its recurrence, and address its effects regardless of whether the alleged actions are subject to criminal investigation.

For this purpose, the outcome of a disciplinary proceeding means only Western State College of Law's final determination with respect to the alleged sexual offense and any sanction that is imposed against the accused. Sanctions, which may be imposed following a final determination, may include but are not limited to: additional training, a restriction on contact, warning, suspension, or termination. Failure to abide by imposed Disciplinary Actions (whether by refusal, neglect or any other reason), may result in additional Disciplinary Action, including suspension or termination.

The following list gives a general breakdown of the types of disciplinary actions that could be applied to the four main VAWA protected categories of crime. For more detailed information about potential disciplinary actions reach out the WSCL Title IX Coordinator or Senior Director of Human resources:

5. Domestic Violence:

- a. Students: depending on the nature, severity, and other circumstances related to the act of domestic violence students may receive one or more of the following disciplinary actions:
 - i. written warnings with a list of consequences that will be enforced upon recurrence of the violation,
 - ii. mandatory relationship and/or anger management training,

- iii. mandatory counseling,
 - iv. restrictions on contact including the potential requirement to change classes or learning modalities and prohibitions on participating in additional school activities including participation in athletics,
 - v. suspension from any and all Westcliff University Activities for up to 1 semester (3 months) or more,
 - vi. expulsion from all Westcliff University programs.
- b. Employees: depending on the nature, severity, and other circumstances related to the act of domestic violence employees may receive one or more of the following disciplinary actions:
- i. written warnings with a list of consequences that will be enforced upon recurrence of the violation,
 - ii. mandatory relationship and/or anger management training,
 - iii. mandatory counseling,
 - iv. restrictions on contact including the potential requirement to change departments, work duties, or work schedule and prohibitions on attending external work activities including team building activities, retreats, student-events, and conferences,
 - v. disciplinary leave or suspension without pay up to 3 months,
 - vi. demotion
 - vii. termination of employment at Westcliff University.

6. Dating Violence:

- a. Students: depending on the nature, severity, and other circumstances related to the act of dating violence students may receive one or more of the following disciplinary actions:
- i. written warnings with a list of consequences that will be enforced upon recurrence of the violation,
 - ii. mandatory relationship and/or anger management training,
 - iii. mandatory counseling,
 - iv. restrictions on contact including the potential requirement to change classes or learning modalities and prohibitions on participating in additional school activities including participation in athletics,
 - v. suspension from any and all Westcliff University Activities for up to 1 semester (3 months) or more,
 - vi. expulsion from all Westcliff University programs.
- b. Employees: depending on the nature, severity, and other circumstances related to the act of dating violence employees may receive one or more of the following disciplinary actions:
- i. written warnings with a list of consequences that will be enforced upon recurrence of the violation,
 - ii. mandatory relationship and/or anger management training,
 - iii. mandatory counseling, restrictions on contact including the potential requirement to change departments, work duties, or work schedule and prohibitions on attending external work activities including team building activities, retreats, student-events, and conferences

- iv. disciplinary leave or suspension without pay up to 3 months,
- v. demotion,
- vi. termination of employment at Westcliff University.

7. Stalking:

- a. Students: depending on the nature, severity, and other circumstances related to the act of stalking, students may receive:
 - i. written warnings with a list of consequences that will be enforced upon recurrence of the violation, mandatory harassment,
 - ii. mandatory training on harassment, Westcliff University's Code of Conduct and social behavior expectations, or other related training,
 - iii. mandatory counseling,
 - iv. restrictions on contact including the potential requirement to change classes or learning modalities and prohibitions on participating in additional school activities including participation in athletics,
 - v. suspension from any and all Westcliff University Activities for up to 1 semester (3 months) or more.
- b. Employees: depending on the nature, severity, and other circumstances related to the act of stalking employees may receive one or more of the following disciplinary actions:
 - i. written warnings with a list of consequences that will be enforced upon recurrence of the violation,
 - ii. mandatory training on harassment, Westcliff University's Code of Conduct and acceptable social behavior, or other related training,
 - iii. mandatory counseling,
 - iv. restrictions on contact including the potential requirement to change departments, work duties, or work schedule and prohibitions on attending external work activities including team building activities, retreats, student-events, and conferences,
 - v. disciplinary leave or suspension without pay up to 3 months,
 - vi. demotion,
 - vii. termination of employment at Westcliff University.

8. Sexual Assault:

- a. Students: depending on the nature, severity, and other circumstances related to the act of sexual assault students may receive:
 - i. written warnings with a list of consequences that will be enforced upon recurrence of the violation,
 - ii. mandatory harassment or related training,
 - iii. mandatory counseling,
 - iv. restrictions on contact including the potential requirement to change classes or learning modalities and prohibitions on participating in additional school activities including participation in athletics,
 - v. suspension from any and all Westcliff University Activities for up to 1 semester (3 months) or more,

- vi. expulsion from all Westcliff University programs.
- b. Employees: depending on the nature, severity, and other circumstances related to the act of sexual assault employees may receive one or more of the following disciplinary actions:
 - i. written warnings with a list of consequences that will be enforced upon recurrence of the violation,
 - ii. mandatory harassment or related training,
 - iii. restrictions on contact including the potential requirement to change departments, work duties, or work schedule and prohibitions on attending external work activities including team building activities, retreats, student-events, and conferences,
 - iv. disciplinary leave or suspension without pay up to 3 months,,
 - v. demotion,
 - vi. termination of employment at Westcliff University.

Both the Complainant and Respondent will be notified simultaneously in writing of the outcome of the investigation and of the sanctions imposed, if any.

The Complainant or Respondent may appeal the outcome determination by written appeal to the WSCL Dean within 15 days of notification of the outcome. An appeal may be made based only on one or more of the following reasons:

- New and significant evidence appeared that could not have been discovered by a properly diligent charged student or complainant before or during the original investigation and that could have changed the outcome.
- The Finding is Arbitrary and Capricious: Reading all evidence in the favor of the non-appealing party, the finding was not supported by reasonable grounds or adequate consideration of the circumstances. In deciding appeals, the WSCL Dean is allowed to make all logical inferences in benefit of the non-appealing party.
- Disproportionate Sanctions: The sanctions were disproportionate to the findings.

The appeal shall consist of a written statement requesting review of the conduct decision or sanction and explaining in detail the basis for the appeal. The WSCL Dean, or designated representative, will notify the non-appealing party of the request for an appeal. Within five working days of receipt of the notice, the non-appealing party may submit a written statement to be included in the case file. The appeal may proceed without the non-appealing party's written statement if it is not submitted within the designated time limit.

The WSCL Dean will endeavor to make a determination of the appeal within 15 days of receipt. The Dean's decision is final. In the event of a change of result, the complainant and respondent will be notified of the change in writing.

In situations where an alleged victim is deceased as a result of a crime or offense, the next of kin will be treated as the alleged victim and receive the Written Determination in the victim's place.

The complete Sexual Misconduct & Relationship Violence Policy & Procedures for Resolving Complaints Affecting Students may be found in the student catalog.

Westcliff University Miami Campus:

The Title IX Coordinator for Westcliff University's Miami campus is: April Vuong, Dean of Student Affairs.

Victims of sexual violence are not required to file a formal complaint or pursue disciplinary action, however, the Westcliff University Title IX coordinator will follow up with reports made by students and explain the process for filing a formal complaint, if the student wishes to do so. The Human Resources department will follow up on reports made by employees and explain the process for filing a formal grievance if the employee chooses to do so. Formal complaints/grievances can be submitted either electronically or in hardcopy and will be used to initiate an investigation into a report of misconduct.

Students and employees can expect investigations and disciplinary proceedings to be completed within around 90 days, however, an extension of time may be granted for good cause, with written notice to the accuser and the accused of the delay and reason for the delay. When cases involve students, The Title IX coordinator will determine whether a request for a delay from either party is sufficient and will inform both parties of delays caused due to circumstances outside either party or the institution's control. If cases involve employees the Senior Director of Human Resources will determine whether a request for a delay from either party is sufficient and will inform both parties of delays caused due to circumstances outside either party or the institution's control. If a case involves both students and employees the Title IX coordinator and Senior Director of Human Resources will work together as a joint commission on all parts of the investigation. If a complainant or respondent needs to request an extension of time at any point in the investigative or disciplinary process either they or their advisor should contact the Westcliff University Title IX coordinator or the Senior Director of Human Resources as soon as possible to make the request.

Disciplinary actions cannot be taken for reports of sexual violence including domestic violence, dating violence, sexual assault, or stalking until after an investigation has been conducted. Westcliff University will review allegations of sexual misconduct using a prompt, fair and impartial process from the initial investigation to the final result.

Students and employees who are involved in such an investigation as either the complainant or the respondent will receive a notice of investigation which will include details of the allegations (including identities of the parties involved, specific section of the policy alleged to have been violated, the conduct that would be considered sexual violence, the date of the incident(s) and the location of the incident(s)); a statement that the Respondent is presumed to be not responsible for the alleged conduct until determination is made according to the University's Grievance Process; a statement that the Parties may have an Advisor of their choice; and a reminder of the expectation of truthfulness including consequences for submitting false information.

The Parties will also be provided with separate written notice of any investigative interview, meeting or hearing. Interview/meeting notices will include the date, time, location, participants and purpose of the investigative interview or meeting. Both parties will be provided their notice simultaneously, 3-5 days prior to the meeting/interview to ensure that they have equal information about and access to the interview/meeting. In emergency situations the meeting may be sooner than 3 days.

During the investigation, the Title IX Coordinator, Senior Director of Human Resources or his/her designee ("Investigator") will conduct interviews and gather evidence. No unauthorized audio or video recordings of any kind are permitted during investigation, but if the interviewees provide consent, meetings will be recorded for documentation purposes. The Parties will be provided an equal opportunity to present facts and witnesses or other evidence.

The Parties (and their Advisors) will be provided with evidence directly related to the allegations, in electronic format or hardcopy, with at least 10 days for the Parties to inspect, review, and respond to the evidence. The Investigator will consider the responses received from the Parties before issuing the investigative report. Once the investigation has concluded, the Investigator will draft an investigative report (hardcopy or electronic) that fairly summarizes relevant evidence. The investigative report will be sent to the Parties (and their Advisors) at least 10 days prior to a Live Hearing. The Parties may provide a written response to the investigative report.

Informal Resolution

If the Complainant and Respondent voluntarily consent in writing, Formal Complaints can be resolved through Informal Resolution, such as mediation.

The Title IX Coordinator or Senior Director of Human Resources will coordinate an appropriate Informal Resolution process depending on the nature of the allegations, the Parties involved, and the overall circumstances.

Informal Resolution will be conducted by a facilitator, who may or may not be the Title IX Coordinator or member of the Human Resource Department. It is not necessary to pursue Informal Resolution first in order to pursue the University's Grievance Process. At any time prior to agreeing to a resolution, any party has the right to withdraw from the Informal Resolution process and resume the Grievance Process.

Informal Resolution is unavailable to resolve allegations that an employee sexually harassed a student.

The timeframe for an Informal Resolution will vary depending on the circumstances but can take up to 90 days or longer with extenuating circumstances.

Live Hearing

If a Formal Complaint is not or cannot be resolved through Informal Resolution, the University will conduct a Live Hearing.

Live Hearings are facilitated by a designated Decision Maker, separate from the Title IX Coordinator, Senior Director of Human Resources, or Investigator. The Decision Maker will be selected by the Title IX Coordinator and/or the Senior Director of Human Resources. When selecting the Decision Maker, the Title IX Coordinator will make sure that the Decision Maker does not have a conflict of interest for or against the accuser or the accused. In order to qualify as a Decision Maker, the individual must also receive annual trainings on issues related to dating violence, domestic violence, sexual assault, stalking and ways to conduct an investigation and hearing process that protects the safety of the victim and promotes accountability. This training is provided by a third party training company.

Live Hearings will be conducted directly, orally, and in real time. Both parties will be allowed to select an advisor of their own choosing. However, advisors should conduct themselves professionally and may be removed at the discretion of The Decision Maker, should they become disruptive. The Decision Maker will permit each party's Advisor to ask the other party and any witnesses all relevant questions and follow-up questions, including those challenging credibility. Questions are asked only by Advisors and not by parties. Only relevant cross-examination and other questions may be asked of a party or witness. Before a Complainant, Respondent, or witness answers a cross-examination or other question, the Decision Maker must first determine whether the question is relevant and explain to the party's Advisor asking cross-examination questions any decision to exclude a question as not relevant.

Rape shield protections are applied to Complainants, deeming irrelevant questions and evidence about a Complainant's prior sexual behavior unless offered to prove that someone other than the Respondent committed the alleged Sexual Harassment or offered to prove consent. If a party or witness does not submit to cross-examination at the Live Hearing, the Decision-Maker will not rely on any statement of that party or witness in reaching a determination regarding responsibility. The Decision Maker will not draw an inference about the determination regarding responsibility based solely on a party's or witness's absence from the Live Hearing or refusal to answer cross-examination or other questions. At the request of either party, the University will provide for the entire Live Hearing (including cross-examination) to occur with the Parties located in separate rooms with technology enabling the Parties to see and hear each other.

Live Hearings may be conducted with all Parties physically present in the same geographic location or, at the University's discretion, any or all Parties, witnesses, and other participants may appear at the Live Hearing virtually.

An audio or audiovisual recording, or transcript, of any Live Hearing will be created and maintained by the University for seven (7) years. During the Grievance Process, the University will not use, rely on or seek disclosure of information protected under a legally recognized privilege, unless the person holding such

privilege has waived the privilege. The University will not access or use a party's medical, psychological, and similar treatment records unless the party provides voluntary, written consent.

Living Hearings can be expected to take around 1-3 days.

The standard of evidence For all Formal Complaints of Sexual Harassment (including where employees are Respondents), the University utilizes the preponderance of the evidence standard, which means "more likely than not."

Prior to or during an investigation, the University will provide interim measures, as necessary. Interim measures are individualized services offered, as appropriate, to either or both the reporting and responding parties involved in an alleged incident of Sexual Misconduct and may include: counseling, extensions of time or other course-related adjustments, modifications to work or class schedules, campus escort services, restrictions on contact between the parties, leave of absence, increased security and monitoring of certain areas on campus, and other similar accommodation. Interim measures should be individualized and appropriate based on the information gathered by the Title IX Coordinator and/ or the Senior Director of Human Resources, making every effort to avoid depriving any student of her or his education or employee of their ability to maintain career stability and compensation. The measures needed by each party may change over time, and the Title IX Coordinator or Human Resource Director should communicate with each student or employee throughout the investigation to ensure that any interim measures are necessary and effective based on the individual's evolving needs.

Following a determination of responsibility, appropriate corrective action will be taken, and the University will take steps to prevent recurrence. Disciplinary Actions taken will be determined on a case-by-case basis. Factors considered when determining Disciplinary Action may include but are not limited to: Nature, severity of, and circumstances surrounding the violations(s); Respondent's disciplinary history; Previous allegations or allegations involving similar conduct; Need for disciplinary action to bring an end/prevent future recurrence of the violation; Need for disciplinary action to remedy the effects on the Complainant and the University community; Impact on the parties; Any other information deemed relevant by the Decision-Maker.

Disciplinary Action include, but are not limited to, additional training, a restriction on contact, warning, suspension, or termination. Failure to abide by imposed Disciplinary Actions (whether by refusal, neglect or any other reason), may result in additional Disciplinary Action, including suspension or termination.

The following list gives a general breakdown of the types of disciplinary actions that could be applied to the four main VAWA protected categories of crime. For more detailed information about potential disciplinary actions reach out the Title IX Coordinator or Senior Director of Human resources:

9. Domestic Violence:

- a. Students: depending on the nature, severity, and other circumstances related to the act of domestic violence students may receive one or more of the following disciplinary actions:
 - i. written warnings with a list of consequences that will be enforced upon recurrence of the violation,
 - ii. mandatory relationship and/or anger management training,
 - iii. mandatory counseling,
 - iv. restrictions on contact including the potential requirement to change classes or learning modalities and prohibitions on participating in additional school activities including participation in athletics,
 - v. suspension from any and all Westcliff University Activities for up to 1 semester (3 months) or more,
 - vi. expulsion from all Westcliff University programs.
- b. Employees: depending on the nature, severity, and other circumstances related to the act of domestic violence employees may receive one or more of the following disciplinary actions:
 - i. written warnings with a list of consequences that will be enforced upon recurrence of the violation,
 - ii. mandatory relationship and/or anger management training,
 - iii. mandatory counseling,
 - iv. restrictions on contact including the potential requirement to change departments, work duties, or work schedule and prohibitions on attending external work activities including team building activities, retreats, student-events, and conferences,
 - v. disciplinary leave or suspension without pay up to 3 months,
 - vi. demotion
 - vii. termination of employment at Westcliff University.

10. Dating Violence:

- a. Students depending on the nature, severity, and other circumstances related to the act of dating violence students may receive one or more of the following disciplinary actions:
 - i. written warnings with a list of consequences that will be enforced upon recurrence of the violation,
 - ii. mandatory relationship and/or anger management training,
 - iii. mandatory counseling,
 - iv. restrictions on contact including the potential requirement to change classes or learning modalities and prohibitions on participating in additional school activities including participation in athletics,
 - v. suspension from any and all Westcliff University Activities for up to 1 semester (3 months) or more,
 - vi. expulsion from all Westcliff University programs.
- b. Employees: depending on the nature, severity, and other circumstances related to the act of dating violence employees may receive one or more of the following disciplinary actions:
 - i. written warnings with a list of consequences that will be enforced upon recurrence of the violation,

- ii. mandatory relationship and/or anger management training,
- iii. mandatory counseling, restrictions on contact including the potential requirement to change departments, work duties, or work schedule and prohibitions on attending external work activities including team building activities, retreats, student-events, and conferences
- iv. disciplinary leave or suspension without pay up to 3 months,
- v. demotion
- vi. termination of employment at Westcliff University.

11. Stalking:

- a. Students: depending on the nature, severity, and other circumstances related to the act of stalking, students may receive:
 - i. written warnings with a list of consequences that will be enforced upon recurrence of the violation, mandatory harassment,
 - ii. mandatory training on harassment, Westcliff University's Code of Conduct and social behavior expectations, or other related training,
 - iii. mandatory counseling,
 - iv. restrictions on contact including the potential requirement to change classes or learning modalities and prohibitions on participating in additional school activities including participation in athletics,
 - v. suspension from any and all Westcliff University Activities for up to 1 semester (3 months) or more.
- b. Employees: depending on the nature, severity, and other circumstances related to the act of stalking employees may receive one or more of the following disciplinary actions:
 - i. written warnings with a list of consequences that will be enforced upon recurrence of the violation,
 - ii. mandatory training on harassment, Westcliff University's Code of Conduct and acceptable social behavior, or other related training,
 - iii. mandatory counseling,
 - iv. restrictions on contact including the potential requirement to change departments, work duties, or work schedule and prohibitions on attending external work activities including team building activities, retreats, student-events, and conferences,
 - v. disciplinary leave or suspension without pay up to 3 months,
 - vi. demotion
 - vii. termination of employment at Westcliff University.

12. Sexual Assault:

- a. Students: depending on the nature, severity, and other circumstances related to the act of sexual assault students may receive:
 - i. written warnings with a list of consequences that will be enforced upon recurrence of the violation,
 - ii. mandatory harassment or related training,
 - iii. mandatory counseling,

- iv. restrictions on contact including the potential requirement to change classes or learning modalities and prohibitions on participating in additional school activities including participation in athletics,
 - v. suspension from any and all Westcliff University Activities for up to 1 semester (3 months) or more,
 - vi. termination from all Westcliff University programs.
- b. Employees: depending on the nature, severity, and other circumstances related to the act of sexual assault employees may receive one or more of the following disciplinary actions:
- i. written warnings with a list of consequences that will be enforced upon recurrence of the violation,
 - ii. mandatory harassment or related training,
 - iii. restrictions on contact including the potential requirement to change departments, work duties, or work schedule and prohibitions on attending external work activities including team building activities, retreats, student-events, and conferences,
 - iv. disciplinary leave or suspension without pay up to 3 months,
 - v. demotion
 - vi. termination of employment at Westcliff University.

The Decision-Maker will issue a Written Determination regarding responsibility with findings of fact, conclusions about whether the alleged conduct occurred, rationale for the result as to each allegation, a description of the procedure from Formal Complaint through the Live Hearing, Disciplinary Actions imposed on the Respondent and whether Remedies will be provided to the Complainant.

The determination will be sent simultaneously to the Parties along with information on how to file an appeal.

Both Parties have the right to appeal a determination regarding responsibility, the University's dismissal of a Formal Complaint or any allegations therein if: (1) procedural irregularity affected the outcome of the matter; (2) there is newly discovered evidence that could affect the outcome of the matter; and/or (3) Title IX personnel or Senior Director of Human Resources had a conflict of interest or bias, that affected the outcome of the matter. An appeal must be submitted in writing to the Title IX Coordinator or Senior Director of Human Resources within 15 days of the delivery of the Written Determination.

If a result changes due to an appeal, additional evidence or any other reason both parties will be simultaneously sent an additional written notice describing the new result and reason for the change.

In situations where an alleged victim is deceased as a result of a crime or offense, the next of kin will be treated as the alleged victim and receive the Written Determination in the victim's place.

Remedies are provided to a Complainant whenever a Respondent is found responsible. Remedies are implemented by the Title IX Coordinator or Senior Director of Human Resources and may be disciplinary and punitive. Remedies are designed to maintain the Complainant's equal access to education or work. Remedies

will be determined on a case-by-case basis. Individuals who make a materially false statement in bad faith in the course of a Grievance Process will be subject to the University's Student Code of Conduct and/or Employee Handbook as it relates to Standard Code of Conduct.

8.f Supportive Measures and Remedies

Westcliff University - Irvine Campus:

Westcliff University will take steps to provide accommodations and supportive measures to assist victims of sexual violence including domestic violence, dating violence, sexual assault and stalking. Students who report that they are victims of sexual violence will be provided with a written notification about options available for assistance in, and ways to request changes to academic, transportation, and working situations or protective measures.

Westcliff University does not have the ability to issue orders of protection. However, students are encouraged to contact the Irvine Police Department at 949-724-7000 to pursue an order of protection if needed. Additional information about types of protective orders and how to obtain them can be found on the OC Courts website at: <https://www.occourts.org/self-help/restraining-orders> . Westcliff University will take the necessary measures, within reason, to comply with any protective orders, no-contact orders, restraining orders or similar lawful orders issued by a criminal, civil or tribal court which Westcliff University becomes aware.

Westcliff University will comply with a student or employee's reasonable request for living, working, and/ or academic situation changes following a report of sexual violence.

When sexual violence has been reported, the Title IX coordinator or Senior Director of Human Resources will provide supportive measures as necessary. Supportive measures are individualized services reasonably available to ensure equal educational access, protect safety or deter prohibited conduct. Supportive Measures are available, as appropriate, to either or both the Complainant and Respondent and are non-punitive, non-disciplinary and not unreasonably burdensome to the other party. These measures may be provided without an investigation or prior to or during investigations of allegations as needed.

Options for Supportive Measures include:

- counseling
- extensions of time for assignment and other course-related adjustments
- modifications to work or class schedules
- campus escort services
- restrictions on contact between the parties
- leaves of absence
- increased security and monitoring of certain areas on campus

- other similar accommodations

The Westcliff University Title IX coordinator or Senior Director of Human Resources is responsible for determining the appropriate supportive measures depending on the circumstances of the situation.

Remedies are provided to a Complainant whenever a Respondent is found responsible at the end of an investigation. Remedies are implemented by the Title IX Coordinator or Senior Director of Human Resources and may be disciplinary and punitive. Remedies are designed to maintain the Complainant's equal access to education or employment. Remedies will be determined on a case-by-case basis and may include any of the supportive measures listed above or other accommodations as determined necessary depending on the situation.

Western State College of Law:

After any campus sexual assaults are reported, the victims of such crimes have the right to request that Western State College of Law personnel take steps or actions reasonably feasible to prevent any unnecessary or unwanted contact or proximity with alleged assailants. These measures may include:

- Providing an escort to ensure the alleged victim can move safely between classes and activities.
- Ensuring that the alleged victim and the alleged perpetrator do not attend the same classes.
- Providing referral to counseling services or providers.
- Providing academic support services, such as tutoring.
- Arranging for the victim to retake a course or withdraw from a class without penalty.

In addition, Western State College of Law will take the necessary measures, within reason, to comply with any protection orders, no-contact orders, restraining orders or similar lawful orders issued by a criminal, civil or tribal court which Western State College of Law becomes aware.

Western State College of Law does not have the ability to issue orders of protection. However, students are encouraged to contact the Irvine Police Department at 949-724-7000 to pursue an order of protection if needed. Additional information about types of protective orders and how to obtain them can be found on the OC Courts website at: <https://www.occourts.org/self-help/restraining-orders> .

Victims will receive written notification about options for, and available assistance, in changing academic, transportation, and working situations, and protective measures.

Westcliff University - Miami Campus :

Westcliff University will take steps to provide accommodations and supportive measures to assist victims of sexual violence including domestic violence, dating violence, sexual assault and stalking.

Students who report that they are victims of sexual violence will be provided with a written notification about options available for assistance in, and ways to request changes to academic, living, transportation, and working situations or protective measures.

Westcliff University does not have the ability to issue orders of protection. However, students are encouraged to contact the Miami Police Department at 305-603-6640 to pursue an order of protection if needed. Additional information about types of protective orders and how to obtain them can be found on the Miami-Dade County Clerk website at <https://www.miamidadeclerk.gov/clerk/restraining-orders.page> or by calling the Domestic Violence advocacy unit at 305-349-5677. Westcliff University will take the necessary measures, within reason, to comply with any protective orders, no-contact orders, restraining orders or similar lawful orders issued by a criminal, civil or tribal court which Westcliff University becomes aware.

Westcliff University will comply with a student or employee's reasonable request for living, working, and/ or academic situation changes following a report of sexual violence.

When sexual violence has been reported, the Title IX coordinator or Senior Director of Human Resources will provide supportive measures as necessary. Supportive measures are individualized services reasonably available to ensure equal educational access, protect safety or deter prohibited conduct. Supportive Measures are available, as appropriate, to either or both the Complainant and Respondent and are non-punitive, non-disciplinary and not unreasonably burdensome to the other party. These measures may be provided without an investigation or prior to or during investigations of allegations as needed.

Options for Supportive Measures include:

- counseling
- extensions of time for assignment and other course-related adjustments
- modifications to work or class schedules
- campus escort services
- restrictions on contact between the parties
- leaves of absence
- increased security and monitoring of certain areas on campus
- other similar accommodations

The Westcliff University Title IX coordinator or Senior Director of Human Resources is responsible for determining the appropriate supportive measures depending on the circumstances of the situation.

Remedies are provided to a Complainant whenever a Respondent is found responsible at the end of an investigation. Remedies are implemented by the Title IX Coordinator or Senior Director of Human Resources and may be disciplinary and punitive. Remedies are designed to maintain the Complainant's equal access to education or employment. Remedies will be determined on a case-by-case basis and may include any of the supportive measures listed above or other accommodations as determined necessary depending on the situation.

8.g Prevention and Education

Westcliff University - Irvine Campus

Educational programs designed to promote the prevention and awareness of sexual violence such as sexual assault, dating violence, domestic violence and stalking are provided to all incoming students during their New Student Orientation and via an interactive, online learning module taken during their first session of class.

These programs are provided in a combination of live/ recorded and self-paced virtual format and are used for students at all campuses. This format accommodates the need for flexibility and ease of access that is most appropriate for students that have grown accustomed to online learning over the last several years.

This Title IX Training is designed to promote awareness, understanding, and compliance with Title IX regulations pertaining to sexual violence as well as harrasment and discrimination, while fostering a safe and inclusive environment at Westcliff University.

Students are empowered to recognize and prevent gender based violence through the combination of interactive sessions, educational resources, and open dialogue.

Westcliff Univeristy prohibits the crimes of dating violence, domestic violence, sexual assault and stalking as defined in section 8.a of this ASR at all of its campuses. The Title IX training is designed to stop these crimes before they occur by promoting positive behaviors that foster healthy, mutually respectful relationships and sexuality, encourage safe bystander intervention, and motivate behavioral changes to foster a culture of positive, mutually beneficial social interaction.

The training:

- Identifies domestic violence, dating violence, sexual assault and stalking as prohibited conduct;
- Defines what behavior constitutes domestic violence, dating violence, sexual assault, and stalking;
- Defines what behavior and actions constitute consent to sexual activity in California;
- Provides safe and positive options for bystander intervention that may be carried out by an individual to prevent harm or intervene when there is a risk of domestic violence, dating violence, sexual assault, or stalking against a person other than the bystander. For instance, in a situation involving sexual assault, dating violence, or stalking, a bystander should minimize risk and:
 - Approach everyone as a friend;
 - Not be antagonistic;
 - Avoid violence;
 - Be honest and direct whenever possible;
 - Recruit help, if possible;
 - Keep safe; and
 - If things get out of hand, contact the police.
- Provides information on risk reduction so that students and employees may recognize warning signs of abusive behavior and how to minimize the risk of potential attacks. 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:

- Being afraid of your partner;
 - Constantly watching what you say to avoid a “blow up;”
 - Feelings of low self-worth and helplessness about your relationship;
 - Feeling isolated from family or friends because of your relationship;
 - Hiding bruises or other injuries from family or friends;
 - Being monitored by your partner at home, work or school; and
 - Being forced to do things you don’t want to do.
- Additional resources are provided to students as part of the training

In addition to trainings provided to new students, interactive, online training is provided to currently enrolled students every spring to facilitate increased awareness of domestic violence, dating violence, sexual assault, and stalking with a focus on develop skills to address these topics and reinforce safe and positive strategies for bystander intervention and risk reduction.

Westcliff University Employees are provided with information about sexual harassment and prohibitions on sexual misconduct in the employee handbook and are required to take a one to two hour (depending on whether they hold a supervisor level position or not) training on sexual harassment and unlawful discrimination every two years for the duration of their employment.

Additional training is provided annually to all employees on a rotating basis to promote the awareness and prevention of domestic violence, dating violence, sexual assault, and stalking. As with the student training, training provided for employees is designed to stop crimes of sexual violence before they occur by promoting positive behaviors that foster healthy, mutually respectful relationships and sexuality, encourage safe bystander intervention, and motivate behavioral changes to foster a culture of positive, mutually beneficial social interaction.

This training reinforces Westcliff University’s prohibition on domestic violence, dating violence, sexual assault, and stalking and covers the same range of topics covered in the student trainings described above, but with relevance to employees and additional emphasis on how employees can facilitate a culture of safety and help students should they become aware that they are victims of sexual violence.

Western State College of Law:

Educational programs promoting the prevention and awareness of sexual violence such as sexual assault, dating violence, domestic violence and stalking are provided to all incoming students during their New Student Orientation and via an interactive, online learning module taken during their first session of class.

These programs are provided in a combination of live/ recorded and self-paced virtual format and are used for students at all campuses. This format accommodates the need for flexibility and ease of access that is most appropriate for students that have grown accustomed to online learning over the last several years.

This annual training is designed to promote awareness, understanding and compliance with Title IX regulations pertaining to sexual violence as well as harrassment and discrimination, while fostering a safe and inclusive environment at Western State College of Law (WSCL).

Students are empowered to recognize and prevent gender based violence through the combination of interactive sessions, educational resources, and open dialogue.

WSCL prohibits the crimes of dating violence, domestic violence, sexual assault and stalking as defined in section 8.a of this ASR. The Title IX training is designed to stop these crimes before they occur by promoting positive behaviors that foster healthy, mutually respectful relationships and sexuality, encourage safe bystander intervention, and motivate behavioral changes to foster a culture of positive, mutually beneficial social interaction.

The training:

- Identifies domestic violence, dating violence, sexual assault and stalking as prohibited conduct;
- Defines what behavior constitutes domestic violence, dating violence, sexual assault, and stalking;
- Defines what behavior and actions constitute consent to sexual activity in California;
- Provides safe and positive options for bystander intervention that may be carried out by an individual to prevent harm or intervene when there is a risk of domestic violence, dating violence, sexual assault, or stalking against a person other than the bystander. For instance, in a situation involving sexual assault, dating violence, or stalking, a bystander should minimize risk and:
 - Approach everyone as a friend;
 - Not be antagonistic;
 - Avoid violence;
 - Be honest and direct whenever possible;
 - Recruit help, if possible;
 - Keep safe; and
 - If things get out of hand, contact the police.
- Provides information on risk reduction so that students and employees may recognize warning signs of abusive behavior and how to minimize the risk of potential attacks. 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:
 - Being afraid of your partner;
 - Constantly watching what you say to avoid a “blow up;”
 - Feelings of low self-worth and helplessness about your relationship;

- Feeling isolated from family or friends because of your relationship;
- Hiding bruises or other injuries from family or friends;
- Being monitored by your partner at home, work or school; and
- Being forced to do things you don't want to do.
- Additional resources are provided to students as part of the training

In addition to trainings provided to new students; interactive, online training is provided to currently enrolled students every spring to facilitate increased awareness of domestic violence, dating violence, sexual assault, and stalking with a focus on develop skills to address these topics and reinforce safe and positive strategies for bystander intervention and risk reduction.

WSCL employees are provided with information about sexual harassment and prohibitions on sexual misconduct in the employee handbook. All WSCL employees are also required to take a one to two hour (depending on whether they hold a supervisor level position or not) training on sexual harassment and unlawful discrimination every two years for the duration of their employment.

Additional training is provided annually to all employees on a rotating basis to promote the awareness and prevention of domestic violence, dating violence, sexual assault, and stalking. As with the student training, training provided for employees is designed to stop crimes of sexual violence before they occur by promoting positive behaviors that foster healthy, mutually respectful relationships and sexuality, encourage safe bystander intervention, and motivate behavioral changes to foster a culture of positive, mutually beneficial social interaction.

This training reinforces WSCL's prohibition on domestic violence, dating violence, sexual assault, and stalking and covers the same topics covered in the student trainings described above, but with relevance to employees and additional emphasis on how employees can facilitate a culture of safety and help students should they become aware that they are victims of sexual violence.

Westcliff University - Miami Campus:

Educational programs designed to promote the prevention and awareness of sexual violence such as sexual assault, dating violence, domestic violence and stalking are provided to all incoming students during their New Student Orientation and via an interactive, online learning module taken during their first session of class.

These programs are provided in a combination of live/ recorded and self-paced virtual format and are used for students at all campuses. This format accommodates the need for flexibility and ease of access that is most appropriate for students that have grown accustomed to online learning over the last several years.

This Title IX Training is designed to promote awareness, understanding, and compliance with Title IX regulations pertaining to sexual violence as well as harassment and discrimination, while fostering a safe and inclusive environment at Westcliff University.

Students are empowered to recognize and prevent gender based violence through the combination of interactive sessions, educational resources, and open dialogue.

Westcliff University prohibits the crimes of dating violence, domestic violence, sexual assault and stalking as defined in section 8.a of this ASR at all of its campuses. The Title IX training is designed to stop these crimes before they occur by promoting positive behaviors that foster healthy, mutually respectful relationships and sexuality, encourage safe bystander intervention, and motivate behavioral changes to foster a culture of positive, mutually beneficial social interaction.

The training:

- Identifies domestic violence, dating violence, sexual assault and stalking as prohibited conduct;
- Defines what behavior constitutes domestic violence, dating violence, sexual assault, and stalking;
- Defines what behavior and actions constitute consent to sexual activity in California;
- Provides safe and positive options for bystander intervention that may be carried out by an individual to prevent harm or intervene when there is a risk of domestic violence, dating violence, sexual assault, or stalking against a person other than the bystander. For instance, in a situation involving sexual assault, dating violence, or stalking, a bystander should minimize risk and:
 - Approach everyone as a friend;
 - Not be antagonistic;
 - Avoid violence;
 - Be honest and direct whenever possible;
 - Recruit help, if possible;
 - Keep safe; and
 - If things get out of hand, contact the police.
- Provides information on risk reduction so that students and employees may recognize warning signs of abusive behavior and how to minimize the risk of potential attacks. 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:
 - Being afraid of your partner;
 - Constantly watching what you say to avoid a “blow up;”
 - Feelings of low self-worth and helplessness about your relationship;
 - Feeling isolated from family or friends because of your relationship;
 - Hiding bruises or other injuries from family or friends;
 - Being monitored by your partner at home, work or school; and
 - Being forced to do things you don’t want to do.
- Additional resources are provided to students as part of the training

In addition to trainings provided to new students, interactive, online training is provided to currently enrolled students every spring to facilitate increased awareness of domestic violence, dating violence, sexual assault, and stalking with a focus on develop skills to address these topics and reinforce safe and positive strategies for bystander intervention and risk reduction.

Westcliff University Employees are provided with information about sexual harassment and prohibitions on sexual misconduct in the employee handbook and are required to take a one to two hour (depending on whether they hold a supervisor level position or not) training on sexual harassment and unlawful discrimination every two years for the duration of their employment.

Additional training is provided annually to all employees on a rotating basis to promote the awareness and prevention of domestic violence, dating violence, sexual assault, and stalking. As with the student training, training provided for employees is designed to stop crimes of sexual violence before they occur by promoting positive behaviors that foster healthy, mutually respectful relationships and sexuality, encourage safe bystander intervention, and motivate behavioral changes to foster a culture of positive, mutually beneficial social interaction.

This training reinforces Westcliff University's prohibition on domestic violence, dating violence, sexual assault, and stalking and covers the same range of topics covered in the student trainings described above, but with relevance to employees and additional emphasis on how employees can facilitate a culture of safety and help students should they become aware that they are victims of sexual violence.

8.h Resources

Westcliff University - Irvine Campus

Upon notification that a student or employee of Westcliff University has been a victim of sexual violence, the Title IX Coordinator or Human Resources Department will provide the student or employee with a written notification about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistances, student financial aid and other services within the institution and the community.

A short list of some available resources can also be found here:

1. **Waymakers:** Waymakers provides critical support for victims of rape and sexual assault through their Rape Crisis Hotline. Trained sexual assault counselors are available 24/7 to offer confidential assistance. If you or someone you know needs help, please call (949) 831-9110 or (714) 957-2737.
2. **RAINN (Rape Abuse Incest National Network):** Victims of sexual assault may receive free confidential 24 hour counseling by calling RAINN (Rape Abuse Incest National Network) hotline number 1-800-656-HOPE (4673). Trained counselors are available at the aforementioned numbers 24

hours a day, 7 days a week. RAINN can also be reached through chat one-on-one with a trained RAINN support specialist for assistance and guidance during difficult times by visiting online.rainn.org. Additionally, receive support, information, advice, or referrals on your smartphone anytime, anywhere using the RAINN mobile app.

3. **OC Sheriffs Victim Referral Services:**

- a. Sexual Assault Victim Services including counseling, accompaniment, and advocacy for victims of rape and sexual abuse, North Orange County Residence can call 714-834-4317 and South Orange County Residents can call 949-752-1971
- b. Domestic Violence Assistance Program including temporary restraining order assistance resources and referral counseling, call 714-935-7956, the temporary restraining order infoline (available 24 hours) can be reached by calling 714-935-7956
- c. CSP Dispute Resolution Services which provide Conflict Settlement through Mediation can be reached at 949-851-3168

Additionally, those seeking access to free and low-cost services in Orange County, including support for victims of domestic violence, you can dial 2-1-1. This helpline connects you to a wide range of resources and assistance through 211 OC.

Westcliff University Employees also have access to an Employee Assistance Program (EAP) through EAP Lifestyle Management, LLC as an employee benefit. All full time employees have access to EAP regardless of whether they obtain benefits through the company. Information about the program is available at 251-621-5360. This service provides referral services and treatment sessions as needed.

Western State College of Law:

Upon notification that a student or employee of Western State College of Law (WSCL) has been a victim of sexual violence, the Senior Assistant Dean of Student Affairs or Human Resources Department will provide the student or employee with a written notification about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistances, student financial aid and other services within the institution and the community.

A short list of some available resources can also be found here:

4. **Waymakers:** Waymakers provides critical support for victims of rape and sexual assault through their Rape Crisis Hotline. Trained sexual assault counselors are available 24/7 to offer confidential assistance. If you or someone you know needs help, please call (949) 831-9110 or (714) 957-2737.
5. **RAINN (Rape Abuse Incest National Network):** Victims of sexual assault may receive free confidential 24 hour counseling by calling RAINN (Rape Abuse Incest National Network) hotline number 1-800-656-HOPE (4673). Trained counselors are available at the aforementioned numbers 24 hours a day, 7 days a week. RAINN can also be reached through chat one-on-one with a trained RAINN support specialist for assistance and guidance during difficult times by visiting online.rainn.org. Additionally, receive support, information, advice, or referrals on your smartphone anytime, anywhere

using the RAINN mobile app.

6. **OC Sheriffs Victim Referral Services:**

- a. Sexual Assault Victim Services including counseling, accompaniment, and advocacy for victims of rape and sexual abuse, North Orange County Residence can call 714-834-4317 and South Orange Count Residents can call 949-752-1971
- b. Domestic Violence Assistance Program including temporary restraining order assistance resources and referral counseling, call 714-935-7956, the temporary restraining order infoline (available 24 hours) can be reach by calling 714-935-7956
- c. CSP Dispute Resolution Services which provide Conflict Settlement through Mediation can be reached at 949-851-3168

Additionally, those seeking access to free and low-cost services in Orange County, including support for victims of domestic violence, you can dial 2-1-1. This helpline connects you to a wide range of resources and assistance through 211 OC.

Westcliff University Employees also have access to an Employee Assistance Program (EAP) through EAP Lifestyle Management, LLC as an employee benefit. All full time employees have access to EAP regardless of whether they obtain benefits through the company. Information about the program is available at 251-621-5360. This service provides referral services and treatment sessions as needed.

Westcliff University - Miami Campus :

Upon notification that a student or employee of Westcliff University has been a victim of sexual violence, the Assistant Campus Director, Title IX Coordinator, or Human Resources Department will provide the student or employee with a written notification about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistances, student financial aid and other services within the institution and the community.

The Miami Rape Treatment Center (RTC) is one resources that students who have experienced sexual assault can access for immediate crisis intervention, questions, and other services:

The Miami Rape Treatment Center (RTC) offers round-the-clock support at 305-585-RAPE (7273), ensuring assistance 24/7 for individuals with questions or in need. This Helpline provides immediate crisis intervention via telephone for both victims and their non-offending family members. For those who are hearing or speech impaired, the RTC can be reached through Florida Relay at 1-800-955-8771 (TTY). Importantly, all RTC services are free of charge and strictly confidential, emphasizing their commitment to aiding victims of sexual assault and their families.

Westcliff University Employees also have access to an Employee Assistance Program (EAP) through EAP Lifestyle Management, LLC as an employee benefit. All full time employees have access to EAP regardless of whether they obtain benefits through the company. Information about the program is available at 251-621-5360. This service provides referral services and treatment sessions as needed.

8.i Sex Offender Registry

Westcliff University - Irvine Campus:

Information regarding registered sex offenders under section 170101 (j) of the Violent Crime Control and Law Enforcement Act of 1994 is available from the Irvine Police Department or Orange County Sheriff. Information is also available online at: www.meganslaw.ca.gov.

Western State College of Law:

Information regarding registered sex offenders under section 170101 (j) of the Violent Crime Control and Law Enforcement Act of 1994 is available from the Irvine Police Department or Orange County Sheriff. Information is also available online at: www.meganslaw.ca.gov. On-campus computer labs with Internet access are available for you to view the above Web site in the Library computer lab, during regular business hours.

Westcliff University - Miami Campus:

Information regarding registered sex offenders under section 170101 (j) of the Violent Crime Control and Law Enforcement Act of 1994 is available from the Miami Police Department. Information is also available online at: <https://offender.fdle.state.fl.us/offender/sops/search.jsf>

9. Alcohol, Drug, Substance Abuse and Weapons Policies

The following sections describe Westcliff University's policies as they relate to alcohol, drug and substance use and prevention and Westcliff University's policies related to weapons.

9.a. Policy Regarding Possession, Use, and Sale of Alcoholic Beverages

Westcliff University - Irvine Campus:

Westcliff University is committed to providing a drug-free campus and workplace. Westcliff University prohibits the unlawful possession, use, or distribution of illicit drugs and alcohol by students, employees, and guests on its premises, or at any activity it sponsors.

Students, employees, and guests must comply with the federal, state, and local laws concerning underage drinking. Illegal drug usage violations of federal, state, or local laws including underage drinking will be reported to the appropriate law enforcement officials.

Underage possession, use, or distribution of beer, wine, or intoxicating liquor while on Westcliff University's campus or at a Westcliff University event is prohibited.

Any possession, use, or distribution of beer, wine, or intoxicating liquor while on Westcliff University's campus and at any Westcliff University event is prohibited.

Students and employees who violate the drug and alcohol policy will be subject to university disciplinary action, up to and including expulsion or termination, pursuant to Westcliff University policies and procedures.

Western State College of Law:

Western State College of Law (WSCL) enforces state laws regarding underage drinking. This prohibition applies while on the property of Western State College of Law or when participating in any institutional activity. Students or employees who violate this policy will be subject to disciplinary action up to, and including, expulsion from Western State College of Law or termination of employment.

Westcliff University - Miami Campus:

Westcliff University is committed to providing a drug-free campus and workplace. Westcliff University prohibits the unlawful possession, use, or distribution of illicit drugs and alcohol by students, employees, and guests on its premises, or at any activity it sponsors.

Students, employees, and guests must comply with the federal, state, and local laws concerning underage drinking. Illegal drug usage violations of federal, state, or local laws including underage drinking will be reported to the appropriate law enforcement officials.

Underage possession, use, or distribution of beer, wine, or intoxicating liquor while on Westcliff University's campus or at a Westcliff University event is prohibited.

Any possession, use, or distribution of beer, wine, or intoxicating liquor while on Westcliff University's campus is prohibited. Limited use of alcoholic beverages at University-Sponsored events may be allowable only with prior approval and authorization from Westcliff University, and only available to individuals who are above the legal drinking age.

9.b Policy Regarding Possession, Use, and Sale of illegal Substances

Westcliff University - Irvine Campus:

Westcliff University adheres to a code of conduct which recognizes the unlawful manufacture, sale, delivery, possession, use or distribution of alcohol and illicit drugs on University property or as part of any University activity is absolutely prohibited.

Prohibited actions include:

- Unlawful possession, use, or distribution of marijuana, narcotics, hallucinogens, barbiturates, amphetamines, prescription drugs, or any other illegal substance.
- Possession, use, or distribution of beer, wine, or intoxicating liquor while on the Westcliff University campus.

- Underage possession, use, or distribution of beer, wine, or intoxicating liquor and/or possession, use, or distribution of beer, wine, or intoxicating liquor at University activity.

Any member of the Westcliff University community found consuming or selling illegal drugs on university property or at a university sponsored activity shall be subject to discipline on a case-by-case basis, but can include expulsion from Westcliff University or termination of employment.

Western State College of Law:

Pursuant to federal and state drug laws, employees and students are prohibited from the unlawful manufacture, distribution, possession, sale or use of illicit/illegal drugs. This prohibition applies while on the property of Western State College of Law or when participating in any institutional activity. Students or employees who violate this policy will be subject to disciplinary action up to, and including, expulsion from Western State College of Law or termination of employment.

Westcliff University - Miami Campus:

Westcliff University adheres to a code of conduct which recognizes the unlawful manufacture, sale, delivery, possession, use or distribution of alcohol and illicit drugs on University property or as part of any University activity is absolutely prohibited.

Prohibited actions include:

- Unlawful possession, use, or distribution of marijuana, narcotics, hallucinogens, barbiturates, amphetamines, prescription drugs, or any other illegal substance.
- Possession, use, or distribution of beer, wine, or intoxicating liquor while on the Westcliff University campus.
- Underage possession, use, or distribution of beer, wine, or intoxicating liquor and/or possession, use, or distribution of beer, wine, or intoxicating liquor at University activity.

Any member of the Westcliff University community found consuming or selling illegal drugs on university property or at a university sponsored activity shall be subject to discipline on a case-by-case basis, but can include expulsion from Westcliff University or termination of employment.

9.c Drug and Alcohol Prevention and Educational Programs

Each year, Westcliff is required to provide its Drug Free Schools Act policy and Drug and Alcohol Abuse Prevention Program.

New students, faculty and staff are provided this information during orientation. Annually, students and employees are provided this information by means of Westcliff's publication of this ASR as well as the student and employee handbooks. Policies related to Drug and Alcohol use and prevention can also be found in Appendix D of this ASR.

Westcliff University - Irvine Campus:

In keeping with section 120(a) through (d) of The Higher Education Act of 1965, as amended, including the Drug-Free Schools and Communities Amendments of 1989 (Public Law 101-226), Westcliff University distributes a Drug Prevention and Prohibition of Drug use policy to all students and employees annually. These policies are contained in the student catalog and handbook which are provided to all newly enrolled students upon enrollment and all current students annually. The handbook is also available to all students and employees on the campus website.

Additionally, employees are provided with Westcliff University's "drug-free community" policy located in the employee handbook. This policy can be found in Appendix D of this ASR.

Westcliff University believes that it is important to promote a drug-free community, to maintain safe, healthy and efficient operations, and to protect the safety and security of the students, employees, facilities, and property of the University. Drugs or alcohol may pose serious risks to the user and all those around the user. In addition, the use, possession, sale, transfer, manufacture, distribution, and dispensation of alcohol, illegal drugs, or marijuana, at Westcliff poses unacceptable risks to the maintenance of a safe and healthy learning environment and to the security of University students, employees, visitors, facilities, and property. For more information about the health risks associated with drug and alcohol please visit the [National Institute on Drug Abuse website](#).

A list of resources for Drug and Alcohol treatment options is available to students and employees upon request through Human Resources and Student Services. It is also available on the school's [Student Resource Center](#) page.

Students and Employees may also choose to utilize resources from the following national organizations:

- [Addiction Center](#)
- [National Institute on Drug Abuse](#)
- [National Institute on Alcohol Abuse and Alcoholism](#)
- [Substance Abuse and Mental Health Services Administration \(SAMHSA\)](#)
- [Alcoholics Anonymous](#)
- [Narcotics Anonymous](#)

Western State College of Law:

In keeping with section 120(a) through (d) of The Higher Education Act of 1965, as amended, including the Drug-Free Schools and Communities Amendments of 1989 (Public Law 101-226), a "Drug Free Schools and Campuses" publication, the Drug Prevention Policy, is provided to all Western State College of Law students and employees annually and is available upon request from Human Resources or Student Services.

Pursuant to federal and state drug laws, employees and students are prohibited from the unlawful manufacture, distribution, possession, sale or use of illicit/illegal drugs. Western State College of Law also enforces state laws regarding underage drinking. This prohibition applies while on the property of Western State College of Law or when participating in any institutional activity. Students or employees who violate this policy will be subject to disciplinary action up to, and including, expulsion from Western State College of Law or termination of employment.

For more information please refer to the Drug and Alcohol Prevention Program and the Drug-Free Workplace and Campus Program that is annually distributed to all employees annually and is available upon request from Human Resources or Student Services. This policy can also be found in Appendix D of this ASR.

Students and Employees may also choose to utilize resources from the following national organizations:

- [Addiction Center](#)
- [National Institute on Drug Abuse](#)
- [National Institute on Alcohol Abuse and Alcoholism](#)
- [Substance Abuse and Mental Health Services Administration \(SAMHSA\)](#)
- [Alcoholics Anonymous](#)
- [Narcotics Anonymous](#)

Westcliff University Miami Campus :

In keeping with section 120(a) through (d) of The Higher Education Act of 1965, as amended, including the Drug-Free Schools and Communities Amendments of 1989 (Public Law 101-226), Westcliff University distributes a Drug Prevention and Prohibition of Drug use policy to all students and employees annually. These policies are contained in the student catalog and handbook which are provided to all newly enrolled students upon enrollment and all current students annually. The handbook is also available to all students and employees on the campus website. Additionally, employees are provided with Westcliff University's "drug-free community" policy located in the employee handbook. These policies can be found in Appendix D of this ASR.

Westcliff University believes that it is important to promote a drug-free community, to maintain safe, healthy and efficient operations, and to protect the safety and security of the students, employees, facilities, and property of the University. Drugs or alcohol may pose serious risks to the user and all those around the user. In addition, the use, possession, sale, transfer, manufacture, distribution, and dispensation of alcohol, illegal drugs, or marijuana, at Westcliff poses unacceptable risks to the maintenance of a safe and healthy learning environment and to the security of University students, employees, visitors, facilities, and property. For more information about the health risks associated with drug and alcohol please visit the [National Institute on Drug Abuse website](#).

A list of resources for Drug and Alcohol treatment options is available to students and employees upon request through Human Resources or the Assistant Campus Director. It is also available on the school's [Student Resource Center](#) page.

Students and Employees may also choose to utilize resources from the following national organizations:

- [Addiction Center](#)
- [National Institute on Drug Abuse](#)
- [National Institute on Alcohol Abuse and Alcoholism](#)
- [Substance Abuse and Mental Health Services Administration \(SAMHSA\)](#)
- [Alcoholics Anonymous](#)
- [Narcotics Anonymous](#)

9.d Weapons Policies

Westcliff University - Irvine Campus:

Possession or use of firearms, air guns, explosive devices, or materials of any description, or deadly weapons, in violation of civil laws and ordinances are in violation of Westcliff University code of conduct and may result in immediate dismissal of a student or termination of an employee.

It is the responsibility of all employees, students, alumni and all others to report any known weapon possession, other than by sworn members of a law enforcement agency acting in performance of their duties, to a member of management.

Western State College of Law:

It is the responsibility of all employees, students, alumni and all others to adhere to the provisions set forth in this policy and to report any known violations of this policy to the Associate Dean for Academic Affairs or a member of management.

It is the responsibility of management and the Associate Dean for Academic Affairs to enforce compliance with this policy and to take corrective action when necessary.

Conditions/Guidelines:

This Policy applies to anyone on the College of Law premises, unless otherwise prohibited by law.

Weapons, including concealed weapons, are not permitted on the College of Law premises and/or at the College of Law events, except that sworn members of a law enforcement agency acting in performance of their duties and/or employees of a licensed armored car service providing contracted services to the College of Law

or to the College of Law's vendors and contractors (where approved by the College of Law) may carry weapons.

Weapons are not permitted in any vehicle while the vehicle is parked on the College of Law property, whether said property is owned or leased by the College of Law or provided to the College of Law for its use, except where otherwise required by law.

Any employee or student who becomes aware of a violation of this policy should immediately notify the Associate Dean for Academic Affairs, the Dean or a member of management, or a member of school staff.

Violation of this policy is considered a serious offense that endangers the safety of anyone on the College of Law premises. Any person violating this policy may be required to leave the College of Law premises. Employees violating this policy are subject to discipline, up to and including termination. Students violating this policy are subject to suspension or dismissal from school.

NOTE: The mere possession of a weapon on the College of Law premises may be subject to disciplinary action including suspension or dismissal.

Westcliff University Miami Campus :

Possession or use of firearms, air guns, explosive devices, or materials of any description, or deadly weapons, in violation of civil laws and ordinances are in violation of Westcliff University code of conduct and may result in immediate dismissal of a student or termination of an employee.

It is the responsibility of all employees, students, alumni and all others to report any known weapon possession, other than by sworn members of a law enforcement agency acting in performance of their duties, to the Assistant Campus Director or a security officer.

10. Clery Crime Statistics

Under the Clery Act, a school must report to the Department of Education and disclose in its Annual Security Report statistics for the three most recently completed calendar years. Institutions must also submit their crime statistics to the Department as part of the annual data collection and survey, including the following crimes (see list below) that have occurred on or within its Clery Geography and that are reported to local police agencies or official campus safety authority (CSA). As outlined in 34 CFR 668.46(c)2, Clery Act reporting does not require the institution to initiate an investigation or disclose personally identifiable information (PII) about the victim.

Crimes that are required for Clery Reporting include:

- Murder/Non-Negligent Manslaughter
- Manslaughter by Negligence
- Sex Offenses (Rape, Fondling, Incest, Statutory Rape)

- Robbery
- Aggravated Assault
- Burglary
- Motor Vehicle Theft
- Arson
- Hate Crimes (Any of the crimes listed above plus Simple Assault, Larceny- Theft, Intimidation or Damage/Destruction/ Vandalism of Property motivated by bias in one of the bias categories)
- Liquor Law Violations Arrests/Referrals
- Drug Law Violations Arrests/Referrals
- Weapons Law Violations Arrests/ Referrals
- Dating Violence
- Domestic Violence
- Stalking

*For definitions of Clery Crimes please see Appendix A.

Clery geographical areas included in these crime statistics are:

1. **On-Campus Property:** 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
 - Any building or property that is within or reasonably contiguous to paragraph (1) of this definition, that is owned by the institution but controlled by another person, is frequently used by students, and supports institutional purposes (such as a food or other retail vendor).
2. **Non-Campus Buildings or Property:** 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.
3. **Public Property:** Public property immediately adjacent to, within, or surrounding one's on-campus geography.

*Westcliff University does not have any on-campus residences associated with any of its campuses.

For the purposes of Clery reporting, the Westcliff University Irvine Campus and Western State College of Law are considered to be a single campus. Therefore, crime reports on Clery Geography that pertains to both campuses are combined in the following charts. These are the statistics that are submitted to the Department

of Education’s Annual Data Collection and Survey in 2023. No hate crimes were reported on any Clery Geographical area associated with Westcliff University’s Irvine campus or Western State College of Law, but if a hate crime were reported a notation would be made to describe the bias.

Westcliff University/ Western State College of Law					
17877 Von Karman Ave Suite 400 & 16715 &16735 Von Karman Ave, Irvine, CA 92606					
WESTCLIFF UNIVERSITY/ WESTERN STATE COLLEGE OF LAW					
CLERY CRIMINAL AND VAWA OFFENSE STATISTICS TABLE					
Criminal Offenses	Calendar Year	On-Campus Property	Non-Campus Buildings or Property	Public Property	Total
<i>Criminal Homicide</i>					
Murder / Non-Negligent Manslaughter	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Manslaughter by Negligence	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
<i>Sex Offenses</i>					
Rape	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Fondling	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Incest	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Statutory Rape	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
<i>Other Criminal Offenses:</i>					
Robbery	2022	0	0	0	0

	2021	0	0	0	0
	2020	0	0	0	0
Aggravated Assault	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Burglary	2022	0	0	0	0
	2021	0	1	0	1
	2020	0	1	0	1
Motor Vehicle Theft	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Arson	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0

VAWA Offenses/ Sexual Violence	Calendar Year	On-Campus Property	Non-Campus Buildings or Property	Public Property	Total
Domestic Violence	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Dating Violence	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Stalking	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0

WESTCLIFF UNIVERSITY/ WESTERN STATE COLLEGE OF LAW CLERY ARRESTS AND DISCIPLINARY STATISTICS REPORTING TABLE					
Liquor, Drug, and Weapon Law Violation Offenses	Calendar Year	On-Campus Property	Non-Campus Buildings or Property	Public Property	Total
Arrests:					
Liquor Law Violations	2022	0	0	0	0
	2021	0	1	0	1
	2020	0	0	0	0
Drug Law Violations	2022	0	0	1	1
	2021	0	1	0	1
	2020	0	0	0	0
Weapons Violations	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Disciplinary Referrals					
Liquor Law Violations	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Drug Law Violations	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Weapon Law Violations	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0

WESTCLIFF UNIVERSITY/ WESTERN STATE COLLEGE OF LAW HATE CRIME REPORTING		
Hate Crime Reporting	2022	There were no hate crimes reported for the 2022 calendar year
	2021	There were no hate crimes reported for the 2021 calendar year
	2020	There were no hate crimes reported for the 2020 calendar year
WESTCLIFF UNIVERSITY/ WESTERN STATE COLLEGE OF LAW UNFOUNDED CRIME REPORTING		

Unfounded Crime Reporting	2022	There were no unfounded crimes reported for the 2022 calendar year
	2021	There were no unfounded crimes reported for the 2021 calendar year
	2020	There were no unfounded crimes reported for the 2020 calendar year

Though the Clery statistics for Westcliff University’s Irvine campus and Western State College of Law’s campus were submitted together, they were collected individually. You can see the crime statistics that pertain to each individual campus along with those separately submitted for Westcliff University’s Miami Campus in the sections below (Note: the separate statistics for Westcliff University and Western State College of Law are for informational purposes and not required to be presented separately under Clery regulations).

Westcliff University - Irvine Campus:

The following charts show the campus crime statistics for Clery geographical areas associated with the Westcliff University Irvine Campus from 2020-2022. No hate crimes were reported on any Clery Geographical area associated with Westcliff University’s Irvine campus, but if a hate crime were reported a notation would be made to describe the bias.

Westcliff University					
17877 Von Karman Ave Suite 400 Irvine, CA 92606					
WESTCLIFF UNIVERSITY					
CLERY CRIMINAL AND VAWA OFFENSE STATISTICS TABLE					
Criminal Offenses	Calendar Year	On-Campus Property	Non-Campus Buildings or Property	Public Property	Total
<i>Criminal Homicide</i>					
Murder / Non-Negligent Manslaughter	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Manslaughter by Negligence	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
<i>Sex Offenses</i>					
Rape	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Fondling	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0

Incest	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Statutory Rape	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Other Criminal Offenses:					
Robbery	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Aggravated Assault	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Burglary	2022	0	0	0	0
	2021	0	1	0	1
	2020	0	1	0	1
Motor Vehicle Theft	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Arson	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0

VAWA Offenses/ Sexual Violence	Calendar Year	On-Campus Property	Non-Campus Buildings or Property	Public Property	Total
Domestic Violence	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Dating Violence	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Stalking	2022	0	0	0	0

	2021	0	0	0	0
	2020	0	0	0	0

WESTCLIFF UNIVERSITY CLERY ARRESTS AND DISCIPLINARY STATISTICS REPORTING TABLE					
Liquor, Drug, and Weapon Law Violation Offenses	Calendar Year	On-Campus Property	Non-Campus Buildings or Property	Public Property	Total
Arrests:					
Liquor Law Violations	2022	0	0	0	0
	2021	0	1	0	1
	2020	0	0	0	0
Drug Law Violations	2022	0	0	0	0
	2021	0	1	0	1
	2020	0	0	0	0
Weapons Violations	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Disciplinary Referrals					
Liquor Law Violations	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Drug Law Violations	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0
Weapon Law Violations	2022	0	0	0	0
	2021	0	0	0	0
	2020	0	0	0	0

WESTCLIFF UNIVERSITY HATE CRIME REPORTING		
Hate Crime Reporting	2022	There were no hate crimes reported during the 2022 calendar year
	2021	There were no hate crimes reported during the 2021 calendar year
	2020	There were no hate crimes reported during the 2020 calendar year
WESTCLIFF UNIVERSITY UNFOUNDED CRIME REPORTING		
Unfounded Crime Reporting	2022	There were no unfounded crimes reported during the 2022 calendar year
	2021	There were no unfounded crimes reported during the 2021 calendar year
	2020	There were no unfounded crimes reported during the 2020 calendar year

Crimes reported at any of the following non-campus property locations have been included in the “non-campus building or property” column of this chart:

- **Momentous Sports Center** indoor athletic facilities located at 14522 Myford Rd, Irvine, CA 92606.
- **Golden West College** indoor athletic facilities located at 15744 Goldenwest St., Huntington Beach, CA 92647.
- **Golden West College** outdoor athletic facilities located at 15744 Goldenwest St., Huntington Beach, CA 92647
- **Orange County Great Park** outdoor athletic facilities located at 8000 Great Park Blvd, in Irvine CA 92618
- **Woollett Aquatic Center** outdoor athletic facilities located at 4601 Walnut Ave in Irvine, CA
- **Jordan Lawley Facility** indoor athletics facilities located at 15350 Barranca Pkwy in Irvine, CA 92618
- **Orange Coast College** outdoor athletic facilities located at 2701 Fairview Rd, Costa Mesa, CA 92626
- **Vanguard University** outdoor athletic facilities located at 55 Fair Dr, Costa Mesa, CA 92626

Westcliff University- Irvine has no on-campus residences associated with it.

Western State College of Law:

The following charts show the campus crime statistics for Clery Geographical areas associated with Western State College of Law from 2020-2022. No hate crimes were reported on any Clery Geographical area associated with WSCL, but if a hate crime were reported a notation would be made to describe the bias.

Western State College of Law					
16715 & 16735 Von Karman Ave, Irvine, CA 92606					
WESTERN STATE COLLEGE OF LAW					
CLERY CRIMINAL AND VAWA OFFENSE STATISTICS TABLE					
Criminal Offenses	Calendar Year	On-Campus Property	Non-Campus Buildings or Property	Public Property	Total
<i>Criminal Homicide</i>					
Murder / Non-Negligent Manslaughter	2022	0	NA	0	0
	2021	0	NA	0	0
	2020	0	NA	0	0
Manslaughter by Negligence	2022	0	NA	0	0
	2021	0	NA	0	0
	2020	0	NA	0	0
<i>Sex Offenses</i>					
Rape	2022	0	NA	0	0
	2021	0	NA	0	0
	2020	0	NA	0	0
Fondling	2022	0	NA	0	0
	2021	0	NA	0	0
	2020	0	NA	0	0
Incest	2022	0	NA	0	0
	2021	0	NA	0	0
	2020	0	NA	0	0
Statutory Rape	2022	0	NA	0	0
	2021	0	NA	0	0
	2020	0	NA	0	0
<i>Other Criminal Offenses:</i>					
Robbery	2022	0	NA	0	0
	2021	0	NA	0	0
	2020	0	NA	0	0

Aggravated Assault	2022	0	NA	0	0
	2021	0	NA	0	0
	2020	0	NA	0	0
Burglary	2022	0	NA	0	0
	2021	0	NA	0	0
	2020	0	NA	0	0
Motor Vehicle Theft	2022	0	NA	0	0
	2021	0	NA	0	0
	2020	0	NA	0	0
Arson	2022	0	NA	0	0
	2021	0	NA	0	0
	2020	0	NA	0	0

VAWA Offenses/ Sexual Violence	Calendar Year	On-Campus Property	Non-Campus Buildings or Property	Public Property	Total
Domestic Violence	2022	0	NA	0	0
	2021	0	NA	0	0
	2020	0	NA	0	0
Dating Violence	2022	0	NA	0	0
	2021	0	NA	0	0
	2020	0	NA	0	0
Stalking	2022	0	NA	0	0
	2021	0	NA	0	0
	2020	0	NA	0	0

WESTERN STATE COLLEGE OF LAW					
CLERY ARRESTS AND DISCIPLINARY STATISTICS REPORTING TABLE					
Liquor, Drug, and Weapon Law Violation Offenses	Calendar Year	On-Campus Property	Non-Campus Buildings or Property	Public Property	Total
Arrests:					
Liquor Law Violations	2022	0	NA	0	0
	2021	0	NA	0	0
	2020	0	NA	0	0
Drug Law Violations	2022	0	NA	1	1
	2021	0	NA	0	0
	2020	0	NA	0	0
Weapons Violations	2022	0	NA	0	0
	2021	0	NA	0	0
	2020	0	NA	0	0
Disciplinary Referrals					
Liquor Law Violations	2022	0	NA	0	0
	2021	0	NA	0	0
	2020	0	NA	0	0
Drug Law Violations	2022	0	NA	0	0
	2021	0	NA	0	0
	2020	0	NA	0	0
Weapon Law Violations	2022	0	NA	0	0
	2021	0	NA	0	0
	2020	0	NA	0	0

WESTERN STATE COLLEGE OF LAW		
HATE CRIME REPORTING		
Hate Crime Reporting	2022	There were no hate crimes reported during the 2022 calendar year
	2021	There were no hate crimes reported during the 2021 calendar year
	2020	There were no hate crimes reported during the 2020 calendar year

WESTERN STATE COLLEGE OF LAW UNFOUNDED CRIME REPORTING		
Unfounded Crime Reporting	2022	There were no unfounded crimes reported during the 2022 calendar year
	2021	There were no unfounded crimes reported during the 2021 calendar year
	2020	There were no unfounded crimes reported during the 2020 calendar year

Western State College of Law has no non-campus properties or buildings or on-campus residences associated with it.

Westcliff University - Miami Campus :

The Westcliff University Miami Campus opened in January 2021, no clery crime statistics are available for 2020. The chart below shows all reported Clery crimes on Miami Campus' Clery geographical areas for the calendar years of 2021 and 2022. No hate crimes were reported on any Clery Geographical area associated with Westcliff University's Miami campus, but if a hate crime were reported a notation would be made to describe the bias.

Westcliff University - Miami Campus					
825 Brickell Bay Drive, Suite 1841, Miami, FL 33131					
WESTCLIFF UNIVERSITY- MIAMI CAMPUS					
CLERY CRIMINAL AND VAWA OFFENSE STATISTICS TABLE					
Criminal Offenses	Calendar Year	On-Campus Property	Non-Campus Buildings or Property	Public Property	Total
Criminal Homicide					
Murder / Non-Negligent Manslaughter	2022	0	NA	0	0
	2021	0	NA	0	0
Manslaughter by Negligence	2022	0	NA	0	0
	2021	0	NA	0	0
Sex Offenses					
Rape	2022	0	NA	0	0
	2021	0	NA	0	0
Fondling	2022	0	NA	0	0
	2021	0	NA	0	0
Incest	2022	0	NA	0	0
	2021	0	NA	0	0

Statutory Rape	2022	0	NA	0	0
	2021	0	NA	0	0
Other Criminal Offenses:					
Robbery	2022	0	NA	0	0
	2021	0	NA	0	0
Aggravated Assault	2022	0	NA	0	0
	2021	0	NA	1	1
Burglary	2022	0	NA	0	0
	2021	0	NA	0	0
Motor Vehicle Theft	2022	0	NA	0	0
	2021	0	NA	0	0
Arson	2022	0	NA	0	0
	2021	0	NA	0	0

VAWA Offenses/ Sexual Violence	Calendar Year	On-Campus Property	Non-Campus Buildings or Property	Public Property	Total
Domestic Violence	2022	0	NA	0	0
	2021	0	NA	0	0
Dating Violence	2022	0	NA	0	0
	2021	0	NA	0	0
Stalking	2022	0	NA	0	0
	2021	0	NA	0	0

WESTCLIFF UNIVERSITY-MIAMI CAMPUS CLERY ARRESTS AND DISCIPLINARY STATISTICS REPORTING TABLE					
Liquor, Drug, and Weapon Law Violation Offenses	Calendar Year	On-Campus Property	Non-Campus Buildings or Property	Public Property	Total
Arrests:					
Liquor Law Violations	2022	0	NA	0	0
	2021	0	NA	0	0

Drug Law Violations	2022	0	NA	0	0
	2021	0	NA	0	0
Weapons Violations	2022	0	NA	0	0
	2021	0	NA	0	0
Disciplinary Referrals					
Liquor Law Violations	2022	0	NA	0	0
	2021	0	NA	0	0
Drug Law Violations	2022	0	NA	0	0
	2021	0	NA	0	0
Weapon Law Violations	2022	0	NA	0	0
	2021	0	NA	0	0

WESTCLIFF UNIVERSITY-MIAMI CAMPUS HATE CRIME REPORTING		
Hate Crime Reporting	2022	There were no hate crimes reported on the Westcliff University Miami Campus Clery Geography in 2022
	2021	There were no hate crimes reported on the Westcliff University Miami Campus Geography in 2021

WESTCLIFF UNIVERSITY- MIAMI CAMPUS UNFOUNDED CRIME REPORTING		
Unfounded Crime Reporting	2022	There were no unfounded crimes reported on the Westcliff University Miami Campus Geography in 2022
	2021	There were no unfounded crimes reported on the Westcliff University Miami Campus Geography in 2021

Westcliff University- Miami has no non-campus properties or buildings or on-campus residences associated with it.

Appendix A: Clery Crime Definitions

Clery Crimes fall into 4 major categories: 1) criminal offenses, 2) hate crimes, 3) Violence Against Women Act of 1994 (VAWA) crime, 4) liquor, drug, and weapons law violation offenses (disciplinary referrals and arrests).

Beginning in January of 2021 the definitions of all criminal offenses and liquor, drug, and weapons law violations could be found in the National Incident-Based Reporting System User Manual (NIBRS). Prior to 2021 the majority of criminal offenses (with the exception of certain sex offenses) were defined by the Summary Reporting System Users Manual (SRS). Hate crimes use the NIBRS definitions of crime but are motivated by bias as described in the CJIS Division and UCR Program Hate Crime Data Collection Guidelines and Training Manual. VAWA offenses use the definitions laid out in the Violence Against Women Act of 1994. Below is a list of Clery Reportable crimes and their definition from the sources described above:

Criminal Offenses:

- **Criminal Homicide** (Murder/Non-Negligent Manslaughter and Manslaughter by Negligence):
 - **Murder/Non-Negligent Manslaughter:** The willful (nonnegligent killing of one human being by another.
 - **Negligent Manslaughter:** The killing of another person through gross negligence.
- **Sex Offenses** (Rape, Fondling, Incest, Statutory Rape):
 - **Rape** (except statutory rape): The carnal knowledge of a person, without the consent of the victim, including instances where the victim is unable to give consent because of his/her age or because of his/her temporary or permanent mental or physical incapacity.
 - **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 unable to give consent because of his/her age or because of his/her temporary or permanent mental or physical incapacity.
 - **Incest:** Nonforcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
 - **Statutory Rape:** Nonforcible sexual intercourse with a person who is under the statutory age of consent.
- **Robbery:** The taking of anything of value from the control, custody, or care of another person by force or threat of force and/or by putting the victim in fear of immediate harm.
- **Aggravated Assault:** An unlawful attack by one person upon another wherein the offender uses a dangerous weapon or displays it in a threatening manner or the victim suffers obvious severe or aggravated bodily injury, or where there was a risk for serious injury/intent to seriously injure.
- **Burglary:** The unlawful entry into a building or some other structure to commit a felony or a theft.
- **Motor Vehicle Theft:** The theft of a motor vehicle.
- **Arson:** To unlawfully and intentionally damage or attempt to damage any real or personal property of another person or entity by fire or incendiary device.

Hate Crimes: Hate crimes include any of the crimes listed above plus Simple Assault, Larceny- Theft, Intimidation or Damage/Destruction/ Vandalism of Property motivated by bias in one of the bias categories.

The definitions of Simple Assault, Larceny-Theft, Intimidation, and Damage/ Destruction/ Vandalism of Property as defined in NIBRs are listed below followed by an explanation of bias categories from the JIS Division and UCR Program Hate Crime Data Collection Guidelines and Training Manual.

- **Simple Assault:** An unlawful physical attack by one person upon another where neither the offender displays a dangerous weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.
- **Larceny-Theft:** The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another person.
- **Intimidation:** To unlawfully place another person in reasonable fear of harm through the use of threatening words and/or other conduct without displaying a dangerous weapon or subjecting the victim to an actual physical attack.
- **Damage/Destruction/ Vandalism of Property:** To willfully or maliciously destroy, damage, deface, or otherwise injure any public or private property without the consent of the owner or the person having custody or control of it.

According to the JIS Division and UCR Program Hate Crime Data Collection Guidelines and Training Manual, crimes must meet the following criteria in order to be classified as a Hate Crime:

1. **Bias motivation:** The FBI UCR Program collects hate crime data regarding criminal offenses motivated, in whole or in part, by the offender's bias against a race, religion, disability, sexual orientation, ethnicity, gender, or gender identity. Due to the difficulty of ascertaining the offender's subjective motivation, bias is to be reported only if investigation reveals sufficient objective facts to lead a reasonable and prudent person to conclude that the offender's actions were motivated, in whole or in part, by bias.
2. **Objective evidence** that the crime was motivated by bias: Motivation is subjective; therefore, it is difficult to know with certainty whether a crime was the result of the offender's bias. For that reason, before an incident can be reported as a hate crime, sufficient objective facts must be present to lead a reasonable and prudent person to conclude that the offender's actions were motivated, in whole or in part, by bias. While no single fact may be conclusive, facts such as the following, particularly when combined, are supportive of a finding of bias:
 - a. The offender and the victim were of a different race, religion, disability, sexual orientation, ethnicity, gender, and/or gender identity. For example, the victim was African American, and the

offender was white.

- b. Bias-related oral comments, written statements, or gestures were made by the offender indicating their bias. For example, the offender shouted a racial epithet at the victim.
- c. Bias-related drawings, markings, symbols, or graffiti were left at the crime scene. For example, a swastika was painted on the door of a synagogue, mosque, or LGBT+ center.
- d. Certain objects, items, or things which indicate bias were used. For example, the offenders wore white sheets with hoods covering their faces or a burning cross was left in front of the victim's residence.
- e. The victim is a member of a specific group that is overwhelmingly outnumbered by other residents in the neighborhood where the victim lives and the incident took place.
- f. The victim was visiting a neighborhood where previous hate crimes had been committed because of race, religion, disability, sexual orientation, ethnicity, gender, or gender identity and where tensions remained high against the victim's group.
- g. Several incidents occurred in the same locality, at or about the same time, and the victims were all the same race, religion, disability, sexual orientation, ethnicity, gender, or gender identity.
- h. A substantial portion of the community where the crime occurred perceived that the incident was motivated by bias.
- i. The victim was engaged in activities related to their race, religion, disability, sexual orientation, ethnicity, gender, or gender identity. For example, the victim was a member of the National Association for the Advancement of Colored People (NAACP) or participated in an LGBT+ pride celebration.
- j. The incident coincided with a holiday or a date of significance relating to a particular race, religion, disability, sexual orientation, ethnicity, gender, or gender identity, e.g., Martin Luther King Day, Rosh Hashanah, or the Transgender Day of Remembrance.
- k. The offender was previously involved in a similar hate crime or is a hate group member.
- l. There were indications a hate group was involved. For example, a hate group claimed responsibility for the crime or was active in the neighborhood.
- m. An established animosity existed between the victim's and the offender's groups.

- n. The victim, although not a member of the targeted racial, religious, disability, sexual orientation, ethnicity, gender, or gender identity group, was a member of an advocacy group supporting the victim group.

For Clery Reporting purposes, the **categories of bias** for hate crimes include:

1. Race
2. Religion
3. Sexual Orientation
4. Gender
5. Gender Identity
6. Disability
7. Ethnicity
8. National Origin

VAWA Crimes: VAWA crimes are defined by the Violence Against Women Act of 1994, a more comprehensive set of terms and definitions can be found in section 8.a of this ASR.

- ***Dating Violence:***The term “dating violence” means violence committed by a person— (A) who is or has been in a social relationship of a romantic or intimate nature with the victim; and (B) where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - The length of the relationship.
 - The type of relationship.
 - The frequency of interaction between the persons involved in the relationship.
- ***Domestic Violence:***The term “domestic violence” includes felony or misdemeanor crimes 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 receiving grant monies, or 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.
- ***Stalking:*** The term “stalking” means engaging in a course of conduct directed at a specific person that would cause a reasonable person to—(A) fear for his or her safety or the safety of others; or (B) suffer substantial emotional distress.

Liquor, Drug, and Weapons Violations: Definitions of Liquor, Drug, and Weapons violations come from NIBRS. These crimes are only reported for Clery Reporting if the action was a violation of the law (not an institutional policy) and resulted in arrest or disciplinary referral.

- **Liquor Law Violations Arrests/Referrals:** The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, or use of alcoholic beverages.
- **Drug Law Violations Arrests/Referrals:** The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation, or importation of any controlled substance.
- **Weapons Law Violations Arrests/ Referrals:** 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.

Appendix B: Jurisdictional Definitions

The Clery Act requires institutions to provide their communities with the definitions of crimes of sexual violence within their local jurisdictions. These definitions can be helpful if a victim is considering reporting a crime to law enforcement. Additionally, schools must provide the definition of "consent" in reference to sexual activity in the applicable jurisdiction and as defined by the institution. This Appendix provides the local jurisdictional definitions of dating violence, domestic violence, sexual assault, stalking, and consent as they pertain to each of Westcliff University's campuses.

Westcliff University - Irvine Campus:

The following definitions apply to jurisdictions within the state of California. These definitions are used by local law enforcement agencies for defining and determining types of Sexual Violence. They may not be the same definitions provided in section 8.a of this ASR, which are the definitions provided by the Violence Against Women Act of 1994 and used by the Westcliff University Campus for the purpose of Clery reporting and disciplinary action.

Domestic Violence: California Penal Code 13700(b), domestic violence means "abuse committed against an adult or a minor who is a spouse, former spouse, cohabitant, former cohabitant, or person with whom the suspect has had a child or is having or has had a dating or engagement relationship."

Sexual Assault: Under California state law, sexual assault is typically referred to as "sexual battery." Sexual battery is defined in California Penal Code Section 243.4 as the unlawful and intentional touching of another person's intimate body parts for the purpose of sexual arousal, sexual gratification, or sexual abuse, against the person's will and without their consent.

Stalking: Under California state law, stalking is defined in Penal Code Section 646.9. Stalking occurs when someone willfully, maliciously, and repeatedly follows, harasses, or threatens another person, causing that person to fear for their safety or the safety of their immediate family.

Consent: Under California state law, consent is defined in the context of sexual assault and related offenses. Specifically, California Penal Code Section 261.6 states "Consent" means positive cooperation in act or attitude pursuant to an exercise of free will. The person must act freely and voluntarily and have knowledge of the nature of the act or transaction involved.

Westcliff University uses the California State Law's definition of consent within the context of sexual assault and related offenses. Consent means positive cooperation in an act or attitude pursuant to an exercise of free will and must act freely and voluntarily with knowledge of the nature of the transaction. Lack of a negative response is not indicative of consent.

Western State College of Law:

The following definitions apply to jurisdictions within the state of California. These definition are used by local law enforcement agencies for defining and determining types of Sexual Violence. They may not be the same definitions provided in section 8.a of this ASR, which are the definitions provided by the Violence Against Women Act of 1994 and used by the Western State College of Law campus for the purpose of Clery reporting and disciplinary action.

Domestic Violence: California Penal Code 13700(b), domestic violence means “abuse committed against an adult or a minor who is a spouse, former spouse, cohabitant, former cohabitant, or person with whom the suspect has had a child or is having or has had a dating or engagement relationship.”

Sexual Assault: Under California state law, sexual assault is typically referred to as "sexual battery." Sexual battery is defined in California Penal Code Section 243.4 as the unlawful and intentional touching of another person's intimate body parts for the purpose of sexual arousal, sexual gratification, or sexual abuse, against the person's will and without their consent.

Stalking: Under California state law, stalking is defined in Penal Code Section 646.9. Stalking occurs when someone willfully, maliciously, and repeatedly follows, harasses, or threatens another person, causing that person to fear for their safety or the safety of their immediate family.

Consent: Under California state law, consent is defined in the context of sexual assault and related offenses. Specifically, California Penal Code Section 261.6 states that "Consent" means positive cooperation in act or attitude pursuant to an exercise of free will. The person must act freely and voluntarily and have knowledge of the nature of the act or transaction involved.

Western State College of Law uses the California State Law's definition of consent within the context of sexual assault and related offenses. Consent means positive cooperation in an act or attitude pursuant to an exercise of free will and must act freely and voluntarily with knowledge of the nature of the transaction. Lack of a negative response is not indicative of consent.

Westcliff University Miami Campus:

The following definitions apply to jurisdictions within the state of Florida. These definition are used by local law enforcement agencies for defining and determining types of Sexual Violence. They may not be the same definitions provided in section 8.a of this ASR, which are the definitions provided by the Violence Against Women Act of 1994 and used by the Westcliff University Campus for the purpose of Clery reporting and disciplinary action.

Dating Violence: In the state of Florida, dating violence is defined under Florida Statute 784.046. Under this statute, dating violence refers to violence between individuals who have or have had a continuing and significant relationship of a romantic or intimate nature.

Domestic Violence: In the state of Florida, domestic violence is defined under Florida Statute 741.28. Domestic violence is a pattern of abusive behavior that occurs within a household or family setting, involving individuals who are related by blood or marriage, individuals who are currently or were formerly married, individuals who reside together or have resided together as a family, and individuals who have a child in common.

Sexual Assault: In the state of Florida, sexual assault is generally referred to as "sexual battery." Sexual battery is defined under Florida Statute 794.011.(1) "Sexual battery" means oral, anal, or vaginal penetration by, or union with, the sexual organ of another or the anal or vaginal penetration of another by any other object; however, sexual battery does not include an act done for a bona fide medical purpose.

Stalking: In the state of Florida, stalking is defined under Florida Statute 784.048. The statute defines stalking as a pattern of repeated, willful, and malicious behavior that is directed at a specific individual, causing the victim to experience substantial emotional distress or fear for their safety.

Consent: Under Florida State Law, consent is defined in the context of sexual battery and related offenses. Specifically, Florida Statute 794.011(a) states that "Consent" means intelligent, knowing, and voluntary consent and does not include coerced submission. "Consent" shall not be deemed or construed to mean the failure by the alleged victim to offer physical resistance to the offender.

Westcliff University uses the California State Law's definition of consent within the context of sexual assault and related offenses. Consent means positive cooperation in an act or attitude pursuant to an exercise of free will and must act freely and voluntarily with knowledge of the nature of the transaction. Lack of a negative response is not indicative of consent.

Appendix C: Overview of Situation-Specific Emergency Procedures

The following information has been adapted from WSCL's Student Crisis Management Plan. It provides a brief overview of emergency information and situation-based response procedures. More detailed emergency incident response information is kept in the Westcliff University Crisis Management Plan by Westcliff University's Emergency Response Team .

Important Contact Information:

Emergency Services (Police or Fire): 911

Non-emergency Services:

Irvine, CA

Irvine Police: 949-724-7000

Orange County Fire Authority: 714-573-600

Non-emergency Services:

Miami, FL

Miami Police: 305-603-6640

Miami Fire Rescue Headquarters: 786-331-5000

Emergency Campus Contact Informations:

Westcliff University Irvine

Main Line: 949-825-5999

Facilities Manager: 949-825-5999 ext 5179

Western State College of Law

Main Line: 714-459-1101

Campus Security: 949-880-7294

Executive Office: 714-206-1268

Business Manager/ Facilities: 714-206-1268

Westcliff University Miami

Assistant Campus Director: 786-798-9836

Evacuation Procedures:

More detailed information about emergency and evacuation procedures and preparedness can be found in section 6 of this ASR.

Evacuation Procedure Overview: *Westcliff University Irvine:*

- Follow evacuation maps posted on campus and listen to instructions given over building PA system or by designated Westcliff University Staff
- do NOT use elevators
- The designated assembly area is: the Irvine Campus is the surface parking lot in front of the building facing Von Karman.

Evacuation Procedure Overview: *Western State College of Law:*

- Follow evacuation maps posted on campus and listen to instructions given over building PA system or by designated WSCL staff
- do NOT use elevators
- The designated assembly area is: the parking lot at the rear of the building.

Evacuation Procedure Overview: *Westcliff University Miami:*

- Follow evacuation maps posted on campus and listen to instructions given over building PA system or by Assistant Campus Director, Security Personnel, or emergency teams
- do NOT use elevators
- The designated assembly area is: the building lobby

What to Do in a Natural Disaster:

Earthquake

In the event of an earthquake, stay as safe as possible. Be aware that some earthquakes are actually foreshocks and a larger earthquake may occur.

If you are indoors:

- DROP to the ground and take COVER by getting under a sturdy table or other piece of furniture, and
- HOLD ON until the shaking stops.
- If there isn't a table or desk near you, cover your face and head with your arms and crouch in an inside corner of the building.
- Stay away from glass, windows, outside doors and walls, and anything that could fall
- Stay inside until the shaking stops
- DO NOT use the elevators

Fire

- If there is a fire ACTIVATE THE BUILDING FIRE ALARM and EVACUATE the building, proceed to the designated assembly areas.
- Wait for EMS personnel to respond if assistance is required from them (and you are out of harm's way).
- Notify EMS personnel IMMEDIATELY if any individuals require assistance to evacuate (ADA), also notify campus emergency contact listed above.

Anticipated Weather Events (such as a Hurricane or Severe Storm):

- Move to an interior room/ hallway and stay away from windows. DO NOT open windows.
- Remain in a safe area until the danger has passed, but evacuate the building if necessary.
- Dial 911 if there are any injuries.
- In the event of an anticipated weather event such as a hurricane or severe storm, the local Crisis Management Team will utilize the Emergency Notifications System to communicate with students, staff, and faculty regarding the emergency.

What to Do During Acts of Violence or Imminent Threats:

Active Shooter

- Evacuate the premise immediately if it is safe to do so.
- Shelter in place if it is not safe to evacuate. Secure the door to the room you are in and turn off the lights.
- IF possible barricade the door or find a secure closet.
- Dial 911 when it is safe to do so and provide your name the location of the shooting
- When it is safe to do so, notify a campus administrator.

Assault/ Stabbing

- Dial 911 and provide your name and location and notify a campus administrator.
- DO NOT attempt to interfere or apprehend the assailant.
- Provide First Aid to any victims if it is safe to do so and wait for law enforcement to respond and provide direction.

Bomb Threat

- Notify a campus administrator after obtaining as much information as possible from the caller using a bomb threat checklist if available.
- Dial 911 and provide our name and location.
- DO NOT attempt to move or touch any suspicious package.
- Wait for law enforcement to respond to provide direction.

Hostage Situation

- Notify a campus administrator and dial 911, provide your name and location information.
- Do not attempt to interfere.
- Leave the area if it is safe to do so.
- Wait for law enforcement to respond to provide direction.

Threat

- If the threat is imminent, call 911 and provide your name and location.
- Notify a campus administrator and preserve any letters or documents with minimal handling.
- Witnesses should be prepared to report any statements in the event of a verbal threat.
- Wait for law enforcement to respond to provide direction.

What to do for Health Emergencies:

Death:

- If there is a death, notify a campus administrator.
- If the death occurs on campus, dial 911 and provide your name and location.
- Clear the immediate area.
- Wait for law enforcement or EMS personnel to arrive and provide direction.

Pandemic Illness:

- In the event of an outbreak of a pandemic illness (e.g. meningitis) contact the local health agency for direction and assistance.
- Contact a campus administrator if there is a potential outbreak on campus.

Severe Accident or Injury:

- Notify a campus administrator.
- Dial 911 and provide your name and location.
- Provide first aid to the injured person if you are able to do so.
- Wait with the injured person for EMS personnel to respond.
- Obtain statements from witnesses.

Mental Health Crisis

- In an emergency call 911
- Use the “Crisis Text Line” by texting “GO” to 741741 from anywhere in the United States.
- The Crisis Text Line is a free service available 24/7 that will connect you with a trained crisis counselor.
- If you located in California you can access the CA Suicide and Crisis lifeline by calling or texting 988
- If you are located in Miami, FL you can reach a suicide prevention helpline by dialing 211

Suspicious Substances

- If you notice a suspicious substance, notify a campus administrator, and dial 911 and provide your name and location.
- Clear the immediate area but make sure that people who were in the immediate area are kept separate from everyone else.
- DO NOT touch or move anything containing a suspicious substance.
- Wait for law enforcement to respond and provide direction

Appendix D: Drug and Alcohol Prevention

This appendix contains the published Drug and Alcohol policies and prevention program materials found in the student and employees handbooks.

Westcliff University- Irvine's Catalog and Student Handbook: Alcohol and Drugs Policy:

Alcohol & Drugs Policy

This policy is applicable to the entire University community, including faculty, staff, students and visitors, and includes any events conducted off-campus that create a potentially hostile campus environment.

Drug Abuse Prevention

The University is committed to creating and maintaining a healthful environment for all members of the community at all locations. Student use of alcoholic beverages and smoking of any material is prohibited in all University facilities, including at any University-associated residential facilities, and any University-owned vehicles. Smoking includes the burning of any type of lighted pipe, cigar, cigarette, or any other smoking equipment, whether filled with tobacco or any other types of material.

Students are encouraged to seek help if they are abusing alcohol and/or illicit drugs. The University will provide appropriate resources and referrals for any students seeking substance abuse treatment.

Prohibition of Illicit Drug Use

The University must adhere to a Code of Conduct which recognizes that the unlawful manufacture, sale, delivery, unauthorized possession or use or distribution of alcohol and illicit drugs on University property or as part of any University activity is absolutely prohibited.

Prohibited actions include:

- *Unlawful possession, use, or distribution of marijuana, narcotics, hallucinogens, barbiturates, amphetamines, prescription drugs, or any other illegal substance.*
- *Student possession, use, or distribution of beer, wine, or intoxicating liquor.*

Federal Financial Aid Penalties for Drug Violations

According to the Higher Education Act (HEA), students convicted for a drug offense that occurred during a period of enrollment while they were receiving federal financial aid may lose eligibility for federal aid. Federal aid includes Federal Pell and FSEOG Grants, Federal Work-study, Federal Perkins Loan, Federal Stafford Loans, Federal PLUS Loans, Graduate PLUS Loans, and other financial assistance.

Convictions During Enrollment

Federal regulations require an enrolled student convicted of a drug offense after receiving federal financial aid to notify Student Financial Services immediately. The student may be ineligible for further aid in that academic year and required to pay back all federal aid received after the date of the conviction. The Westcliff Financial Aid Office staff will work with the student regarding all of the available options.

Institutional Sanctions for Alcohol and Drug Violations

Any member of the Westcliff University community found consuming or selling illegal drugs on University property shall be subject to discipline on a case-by-case basis.

Alcohol and Substance Use

To conform to federal law, the University does not permit the use of alcoholic beverages on campus and does not tolerate the use of illegal substances on the campuses, in University-owned or operated properties, in University- affiliated housing, or at University-affiliated events and activities. The University recognizes that occasionally a student or staff member may need help in these areas. Students or employees who need help are encouraged to speak to the Dean of Student Affairs or to any other trusted staff member for referral to an appropriate counseling source.

Western State College of Law’s Student Handbook: Drug and Alcohol Prevention Program and Drug-Free Workplace and Campus Program

Drug and Alcohol Policies

In keeping with section 120(a) through (d) of The Higher Education Act of 1965, as amended, including the Drug-Free Schools and Communities Amendments of 1989 (Public Law 101-226), a “Drug Free Schools and Campuses” publication, the ‘Drug and Alcohol Prevention Program and the Drug-Free Workplace and Campus Program’, is provided to all students and employees annually.

Pursuant to federal and state drug laws, employees and students are prohibited from the unlawful manufacture, distribution, possession, sale or use of illicit/illegal drugs. The college also enforces state laws regarding underage drinking. This prohibition applies while on the property of the college or when participating in any institutional activity. Students or employees who violate this policy will be subject to disciplinary action up to, and including, expulsion from the college or termination of employment.

For more information please refer to the Drug and Alcohol Prevention Program and the Drug-Free Workplace and Campus Program. <https://www.wsulaw.edu/wp-content/uploads/2020/01/drug-alcohol-policy-wsu.pdf>

Westcliff University- Miami's Catalog and Student Handbook: Alcohol and Drugs Policy

This policy is applicable to the entire University community, including faculty, staff, students and visitors, and includes any events conducted off-campus that create a potentially hostile campus environment.

Drug Abuse Prevention

The University is committed to creating and maintaining a healthful environment for all members of the community at all locations. Student use of alcoholic beverages and smoking of any material is prohibited in all University facilities, including at any University-associated residential facilities, and any University-owned vehicles. Smoking includes the burning of any type of lighted pipe, cigar, cigarette, or any other smoking equipment, whether filled with tobacco or any other type of material.

Students are encouraged to seek help if they are abusing alcohol and/or illicit drugs. The University will provide appropriate resources and referrals for any students seeking substance abuse treatment.

Prohibition of Illicit Drug Use

The University must adhere to a Code of Conduct which recognizes that the unlawful manufacture, sale, delivery, unauthorized possession or use or distribution of alcohol and illicit drugs on University property or as part of any University activity is absolutely prohibited.

Prohibited actions include:

Unlawful possession, use, or distribution of marijuana, narcotics, hallucinogens, barbiturates, amphetamines, prescription drugs, or any other illegal substance.

Student possession, use, or distribution of beer, wine, or intoxicating liquor.

Federal Financial Aid Penalties for Drug Violations

According to the Higher Education Act (HEA), students convicted for a drug offense that occurred during a period of enrollment while they were receiving federal financial aid may lose eligibility for federal aid. Federal aid includes Federal Pell and FSEOG Grants, Federal Work study, Federal Perkins Loan, Federal Stafford Loans, Federal PLUS Loans, Graduate PLUS loans and other financial assistance.

Convictions during Enrollment

Federal regulations require an enrolled student convicted of a drug offense after receiving federal financial aid to notify the Office of Financial Aid immediately. The student may be ineligible for further aid in that academic year and required to pay back all federal aid received after the date of the conviction. The Westcliff Office of Financial Aid will work with the student regarding all of the available options.

Institutional Sanctions for Alcohol and Drug Violations

Any member of the Westcliff University community found consuming or selling illegal substances/drugs on University property shall be subject to discipline on a case-by-case basis.

Westcliff University- Employee Handbook (applies to all Campuses): Substance Abuse and Drug-Free Workplace Policy

1. Scope of Policy.

This Policy applies to all employees of University, LLC (“University”), including management, administration, and temporary employees who have received conditional offers of employment with University.

2. Dissemination of Policy.

All employees have or will receive a copy of this Policy and will be required to sign an appropriate acknowledgement and receipt.

3. Definitions.

A. Illegal Drugs

“Illegal drugs” means any controlled substance listed in Schedules 1 through V of the Federal Controlled Substance Act (21 U.S.C., § 812), medication, or other chemical substance that (1) is not legally obtainable; or (2) is legally obtainable, but is not legally obtained, is not being used legally, or is not being used for the purpose(s) for which it was prescribed or intended by the manufacturer. Thus, “Illegal drugs” may include even over-the-counter medications, if they are not being used for the purpose(s) for which they were intended by the manufacturer.

Prohibited drugs include, but are not limited to:

(2) Hallucinogens – for example LSD, mescaline, and ecstasy.

(3) Stimulants – for example amphetamine and methamphetamine.

(4) Depressants – for example barbiturates, oxazepam, and quazepam.

(5) Narcotics – including opium derivatives (for example, heroin, morphine, oxycodone, and codeine), cocoa leaf derivatives (for example), cocaine and crack), and cannabis derivatives (for example, marijuana and hashish).

B. Legal Drugs

“Legal Drugs” means prescribed over-the-counter drugs that are legally obtained by the employee and used for the purpose(s) for which they were intended by the manufacturer. “Legal drugs” does not include marijuana.

C. University Property

“University property” and “University equipment, machinery, and vehicles” means all property, equipment, machinery, and vehicles owned, leased, rented, or used by University.

D. On Duty

“On duty” means all working hours, as well as meal periods and break periods, regardless of whether on University property, and all hours when an employee represents University in any capacity.

4. Work Rules

A. Substance Abuse by Employees

(1) Alcohol

a. Employees may not use, possess, sell, or transfer alcohol while working, while on University property, or while operating University equipment, machinery, or vehicles.

b. Employees may not work or report to work under the influence of alcohol.

c. Employees who violate either of these rules will be subject to discipline, up to and including immediate discharge. University may make exceptions to these rules for certain business or social functions sponsored or approved by University.

(2) Illegal Drugs

a. Employees may not possess illegal drugs or engage in the illegal use of drugs while on duty, while working, while on University property, or while operating University equipment, machinery, or vehicles.

b. Employees may not work or report to work under the influence of illegal drugs or with detectable levels of illegal drugs or the metabolites of illegal drugs in their systems.

c. Employees may not manufacture, distribute, dispense, transfer or sell illegal drugs.

d. Employees who violate any of these rules will be subject to discipline, up to and including immediate discharge.

B. Legal Drugs/Medication

Any employee who has reason to believe that the legal use of drugs, such as prescribed medication, may pose a safety risk to any person or interfere with the employee’s performance of his or her job must report such legal drug use to his or her supervisor. University shall then determine whether any work restriction or limitation is indicated. Failure to report the legal use of a drug that may pose a safety risk could result in disciplinary action.

C. Criminal Drug Convictions

Any employee who is convicted of violating any criminal drug statute while in the workplace will be subject to discipline up to and including immediate discharge. Employees are required to report any criminal drug statute conviction occurring in the workplace to their immediate supervisor within five days.

5. Drug Testing

A. Reasonable Suspicion Testing

If any employee's supervisor or manager has a reasonable suspicion that the employee is working in an impaired condition or otherwise engaging in conduct that violates this Policy, the employee will be asked about any observed behavior and offered an opportunity to give a reasonable explanation. If the employee is unable to explain the behavior, the employee will be asked to take a drug and alcohol test in accordance with the procedures outlined below.

If the employee refuses to cooperate with the administration of the drug and alcohol test, the refusal will be handled in the same manner as a positive test result.

B. Post-Accident or Mishap Testing

Employees who are involved in an accident or mishap at work, or while performing University business, may be required to submit to a drug and alcohol screening test.

If the employee refuses to cooperate with the administration of the drug and alcohol screening test, the refusal will be handled in the same manner as a positive result.

C. Procedure for Drug Testing

University will refer the employee to an independent, National Institute on Drug Abuse (NIDA)-certified medical clinic or laboratory, which will administer the test. University will pay the cost of the test and reasonable transportation costs to the testing facility. The employee will have the opportunity to alert the clinic or laboratory personnel to any prescription or non-prescription drugs that the employee has taken that may affect the outcome of the test. Except as provided below, all drug testing will be performed by urinalysis. However, testing for alcohol will be done by use of a breathalyzer. Initial screening will be done by EMIT II. Positive results will be confirmed by gas chromatography/ mass spectrometry.

The clinic or laboratory will inform the University whether the employee passed or failed the drug test. If an employee fails the test, the employee will be considered to be in violation of this guideline and will be subject to discipline accordingly.

D. Acknowledgement and Consent

Any employee subject to testing under this policy will be asked to sign a form acknowledging the procedures governing testing and consenting to (1) the collection of a urine sample for the purpose of determining the

presence of alcohol or drugs, and (2) the release to University of the test results. Refusal to sign the agreement and consent form, or to submit to the drug test, will subject an employee to discipline up to and including termination.

6. Substance Abuse Treatment

A. Voluntary Participation

No employee will be subject to discipline for voluntarily seeking substance abuse treatment. But, an employee's participation in a substance abuse treatment program will not excuse the employee from being required to meet all of the same standards and qualifications for the job that apply to other employees, including performance, attendance, and other measures. Further, an employee may be required to sign a Return to Work Agreement after successfully completing substance abuse treatment which (in addition to University's existing employment policies) will govern the terms and conditions of the employee's continued at-will employment.

B. Unpaid Leave

Employees who wish to voluntarily enter and participate in an approved alcohol or drug rehabilitation program are encouraged to contact our Human-Resources Representative. University will, at its sole discretion, determine whether it can accommodate the employee by providing unpaid leave for the time necessary to complete participation in the program.

7. Disclosure and Confidentiality

Disclosures made by employees to University concerning their use of legal drugs will be treated confidentially and will not be revealed to managers or supervisors unless there is an important work-related reason to do so in order to determine whether it is advisable for the employee to continue working.

Disclosures made by the employees to University concerning their participation in any drug or alcohol rehabilitation program will be treated confidentially.

8. Drug-Free Awareness Programs

University will conduct drug-free awareness programs periodically. These programs will inform employees about the dangers of drugs and alcohol abuse in the workplace, University's policy of maintaining a drug and alcohol-free workplace, available drug and alcohol counseling, rehabilitation, and employee assistance programs, and the penalties that may be imposed for drug and alcohol abuse violations.

Employees are encouraged to approach their immediate supervisor at any time with questions they have about the University's Substance Abuse Policy.