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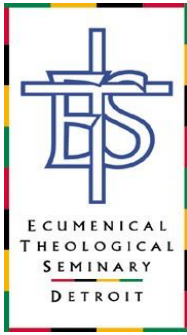
# **CAMPUS SECURITY REPORT**

*For Students, Faculty, and Staff*

# 2020 ETS Campus Security Report

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## ETS CAMPUS SECURITY REPORT

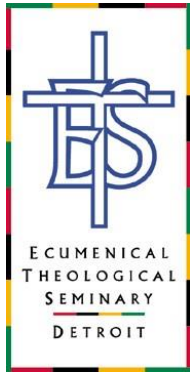
### Introduction

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act) requires all Title IV participating institutions to annually prepare a security report that contains very specific campus security policy disclosures that will provide students and families with information needed to make informed decisions regarding safety on campus. Campus security policies and crime statistics requirements are stipulated under 34 C.F.R. 688.46.

This report is submitted in compliance with Clery Act requirements.

Part I of this report contains all policies and disclosures required by the Clery Act.

Part II contains the campus crime statistics to date that ETS is required to report.



**Subject:** Part I of ETS Campus Security Report  
(Policies and Disclosures Required by the Clery Act)

**Effective:** June 14, 2020

**Pages:** 6

## **1.0 Purpose:**

The purpose of Part I of the ETS Campus Security Report is to set forth ETS policies regarding procedures for students and others to report criminal actions or other emergencies occurring on campus and to state ETS' policies concerning its response to such reports as required by the U.S. Code of Federal Regulations at 34 CFR 688.46(b)

## **2.0 Scope**

This statement applies to all ETS students, staff, faculty, or others who may observe or have knowledge of a crime occurring on the ETS campus.

## **3.0 Responsibility**

The interpretation, administration and monitoring for revision and compliance of this statement is the responsibility of the Executive Assistant to the President - Operations ("EAP - Operations") or his/her designee(s). See also ETS Human Resources Policy No. 11.12 regarding Safety and Security incorporated by reference and affixed hereto as **Attachment A**.

## **4.0 Policy**

### **4.1 Reporting Procedures:**

Any criminal actions or emergencies (e.g., fire, injury, illness) that a student, faculty member or staff member observes or discovers that has been committed on campus during the business hours should immediately be reported to the VP of Administration, herein thereafter referred to as EAP - Operations. The EAP - Operations can be reached from any seminary phone by dialing ext. 207 or from any non-college phone by dialing (313) 831-5200 x207.

If criminal action or emergencies are observed or discovered after business hours on days on which classes are held (i.e., Monday through Thursday from 9:00 a.m. until 10:00 p.m. and Saturday from (8:30 a.m. until 4:30 p.m.), students, staff, and faculty members are directed to report the situation to our Campus Security Authority (“CSA”), Mr. Willie Hunter, at (313) 779-3832 (cell) or (313) 831-5200 x214 (ofc). The Evening Personnel can be reached at (313) 831-5200 x214. (See also Section 6.0 below.)

## **4.2 ETS Policies for Responding to Such Reports**

Upon receipt of a report of criminal activity occurring on campus, the EAP - Operations will assure that all action required by 34 C.F.R. 688.46 and by this policy is taken.

**4.2.1** *In the event of a fire*, an alarm will sound. Persons in the campus building should move calmly and immediately outside and stand in an area at least 50 feet from the building and away from any smoke. Staff and/or faculty will take a headcount and match it to their attendance data. Any person(s) unaccounted for should be reported to fire department personnel immediately and, as soon as possible thereafter, to the EAP - Operations (313) 831-5200 ext. 207 during business hours or to the CSA (313) 779-3832 after business hours. In such an event, the CSA will immediately call the EAP - Operations to inform him or her of the situation.

**4.2.2** *In the event of a medical emergency*, students, staff, and faculty are to call the EAP - Operations (313) 831-5200 x207 during business hours or CSA (313) 779-3832 after business hours. Help will be dispatched to assist. If the medical emergency is life threatening, immediately call 911 for emergency medical service and then contact the administrative office or the CSA, as appropriate. If such an event occurs after business hours once help is dispatched the CSA will immediately call the EAP - Operations to inform of the situation.

## **4.3 Timely Warning**

**4.3.1** *Policies for Making Timely Warning Reports*. It is the policy of ETS to timely report all crimes to the campus community in a manner that is timely and will aid in the prevention of crimes described in 34 CFR 688.46(c) (1) and (3) (e.g., criminal homicide, murder and nonnegligent manslaughter, negligent manslaughter, forcible and nonforcible sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, arson, arrests for liquor law violations and illegal weapons possession, hate crimes by category of prejudice and involving bodily injury); crimes and emergencies reported to campus security authorities as identified under the ETS’s statement of current campus policies mandated by 34 CFR 688.46 (b) (2) or reported to local police agencies and considered by ETS to represent a threat to students and employees.

**4.3.2** To meet the requirement for timely “reporting to the campus community,” it is the policy of ETS to do the following:

- Simultaneously post a summary of all crimes recorded pursuant to these regulations at the time they are recorded
  - In the lobby of the Administration/Sanctuary Building,
  - In each classroom,
  - In each administrative office,
  
- Post annual crime statistics to our website as required by these regulations, and
  
- If criminal activity occurs which could pose a threat to others on campus, to assure timely warning is made to others, the EAP - Operations (or CSA at night) should instruct staff, faculty, and students on campus via the public address system, to secure themselves in an office that can be locked until they are cleared to emerge. Simultaneously, the EAP - Operations (or CSA at night) will summon local police authorities. Those in secured offices will be informed when they have been cleared to emerge.

#### **4.4 Policies for Preparing the Annual Disclosure of Crime Statistics**

It is the policy of ETS to prepare the Annual Disclosure of Crime Statistics in the following manner:

- 4.4.1** The EAP - Operations will collect and record any report of criminal activity set forth in 34 C.F.R. 688.46 (c) (1) that are reported by students, faculty, and staff during the business hours or any such crimes reported to and recorded by the CSA after business hours.
  
- 4.4.2** On or about August 15<sup>th</sup> of each year, the EAP - Operations will submit, according to City policy, a Freedom of Information Act request to the Detroit Police Department Precinct through the Detroit Law Department Coleman A. Young Municipal Center 2 Woodward Avenue, Suite 500, Detroit, MI 48226-3437, requesting data to meet statistical reporting requirements required by 34 C.F.R. 688.46 (c) (1) and (3).
  
- 4.4.3** The EAP - Operations will compile the data described above into the format required by 34 C.F.R. 688.46 (b).
  
- 4.4.4** On or before October 1<sup>st</sup> each year, the EAP - Operations will report the above compiled data to DOE and to the campus community in accordance with the requirements of 34 C.F.R. 688.46.

#### **4.5 Persons to Whom Reports Should Be Made**

The names of persons, by title, to whom students or employees should report a criminal offense described in 34 C.F.R. 688.46(c) (1) for the purpose of making timely warning reports and the annual statistical disclosure are:

<b>Title</b>	<b>Name</b>	<b>Telephone #</b>
During Business Hours:		
1. EAP - Operations	Barbara Pye	313.831-5200 x207
2. Business Office Manager (alternate)	Jacquelyn Hines	313.831-5200 x211
After Business Hours:		
1. Campus Security Authority	Willie Hunter	313.779-3832/Cell 313. 831-5200 x214

#### **4.6 Reporting Crimes on a Voluntary/Confidential Basis**

It is the policy of ETS to allow victims or witnesses to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics. Victims or witnesses wanting to report a crime voluntarily may do so by submitting a written statement or by requesting an audience with the EAP - Operations for the purpose of reporting a crime in such a manner. In either event, the statement will be received for the purpose of making timely warning reports and for the annual statistical disclosure, and confidentiality as to the person making the statement will be kept.

#### **5.0 Policies Concerning Security of and Access to Campus Facilities and Security Considerations Used in the Maintenance of Campus Facilities**

Invited guests and members of the general public must access our campus from the Woodward Avenue side of the parking lot and through the west lobby door. Students are directed to park on the south and east areas of the parking lot and enter through the south lobby door. Staff may use either lobby door to access the building. Students, Staff and Faculty are assigned door fobs for entrance into the building. Students are also assigned ID badges and are required to wear them at all times when they are in the building. Door fobs are person specific and are not to be shared with others.

All guests must sign in and out at receptionist desk.

The building is protected at night and when no activity is scheduled by a building alarm system. Our CSA or an administrative officer sets the alarm when the building is closed and disarms it when the building is opened.

#### **6.0 Policies Concerning Campus Law Enforcement**

ETS campus security is the primary responsibility of the EAP - Operations. However, some responsibility for campus security is delegated to Mr. Willie Hunter, a staff member whose job title is “Security Officer”. Mr. Hunter is our CSA. He is on duty 9-hours a day from 8:00 a.m. until 5:00 p.m., on days that classes are held (i.e., Monday through Thursday and Saturday) and for special events as required. There is also Evening Personnel on duty 5:00 p.m. until 10:00 p.m., on days that classes are held.

While our CSA (s) has no *official police authority or training*, they patrol the ETS campus by foot and vehicle. By their presence, our CSA helps keep our campus secure by watching cars parked on the parking lot, keeping unauthorized persons off our campus, escorting, or observing students and staff as they walk to and from their vehicles if requested, and securing the campus when there is no scheduled activity. Our CSA can assist students, staff, faculty, and visitors that are locked out of their vehicles or have dead batteries.

When present on campus after non-business hours, our CSA receives reports of criminal activities from students or faculty, records them, and presents them to the EAP - Operations on the following day for inclusion in official records. The CSA is not an official campus police officer or campus security department and, therefore, is not required to maintain an official daily crime log pursuant to 34 C.F.R 688.46(f).

## **6.1 Working Relationship with Local Police Agencies**

Although ETS does not employ official or certified and trained police officers, ETS has a working relationship with the local police who are able to support and provide services promptly in the event of an incident. ETS encourages accurate and prompt reporting of all crimes to the local police.

## **6.2 Accurate and Prompt Reporting Required**

Please note that all students, employees, and visitors also share responsibility for their own safety and are encouraged to take common sense precautions and report all incidents (i.e., crimes and emergencies) to the Administrative Office (313) 831-5200 x207 during business hours, to the CSA (313) 779-3832 after business hours, and directly to 911 in the case of ongoing crimes or life-threatening emergencies.

## **6.3 Pastoral and Professional Counselors**

When a pastoral or professional counselor deems it appropriate to do so, they may inform persons that they are counseling that it is the policy of ETS to allow a witness or victim of a crime to report the incident to the EAP - Operations on a voluntary or confidential basis for inclusion in the annual disclosure of crime statistics (See also paragraph 4.6 above).

## **6.4 Possession, Use, and Sale of Alcoholic Beverages, Illegal Drugs, and Weapons on Campus**



It is the policy of ETS to strictly forbid the possession, use and sale of alcoholic beverages, illegal drugs, and weapons at any time on its campus. ETS will cooperate in the enforcement of Federal and State drug laws and drinking laws (including State underage drinking laws) by law enforcement authorities. See also ETS Human Resources Policy No. 11.11 regarding Drugs and Intoxicants hereby incorporated by reference and affixed hereto as **Attachment B**.

## **6 Campus Sexual Assault Programs**

It is the policy of ETS to provide and maintain a campus environment that is free of harassment and discrimination based on sex (see also ETS Human Resources Policy No. 4.03 regarding Sexual and Other Harassment hereby incorporated by reference and affixed hereto as **Attachment C**) or any other legally protected status. All employees of ETS, as well as all other persons or entities affiliated or connected with ETS, are prohibited from engaging in any behavior that constitutes such harassment.

If a sex offense is alleged to have been committed against a student, the policies, definitions, practices, and procedures for reporting, investigating, resolving, and documenting such an offense, and the confidentiality policy described in Human Resources Policy No. 4.03 (pertaining to employees) will be applied as described therein in the event of an alleged sex offense against a student. In addition, the EAP - Operations will assist students in locating appropriate counseling, mental health, or other student services for victims of sex offenses. The EAP - Operations will assist a victim in understanding how her/his academic situation may be changed following an alleged sex offense, as appropriate. The EAP - Operations will also aid a victim in understanding procedures for disciplinary actions in cases of an alleged sex offense, including their absolute right to have others present during a disciplinary proceeding brought alleging a sex offense, and in understanding sanctions ETS may impose following a final determination of an institutional disciplinary proceeding regarding rape, acquaintance rape, or other forcible or nonforcible sex offenses. Students have the option to notify appropriate law enforce authorities and to be assisted by ETS administrative personnel in reporting offenses to law enforcement authorities is they request such help.

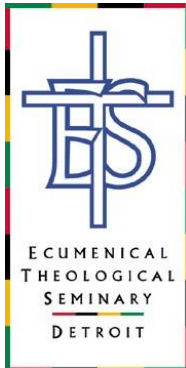
The ETS campus community is hereby notified that it may obtain information about registered sex offenders online at: [ww.communitynotification.com/cap\\_main.php?office=55242/](http://ww.communitynotification.com/cap_main.php?office=55242/) or by contacting the Detroit Police Department, 1301 Third Avenue, Detroit, MI 48207 (313) 596-2200.

## **Attachments to Part I of ETS' Campus Security Report**

ATTACHMENT A—ETS Human Resources Policy No. 11.12 re Safety and Security

ATTACHMENT B—ETS Human Resources Policy No. 11.11 re Drugs and Intoxicants

ATTACHMENT C—ETS Human Resources Policy No. 4.03 re Sexual and Other Harassment



**Attachment A: ETS Safety and Security**

Supersedes: All existing Safety and Security related policies  
Effective: May 19, 2006  
Revised: June 13, 2020  
Pages: 3

**1.0 Philosophy/Purpose**

It is the intention of ETS to provide a safe environment for its employees, students, and other members of the ETS community. To this end, ETS strives to maintain an environment free of hazards, theft, threats, harassment, intimidation, physical and verbal abuse, and coercion. This means that all people shall be treated with respect and consideration. This policy defines safety and security related issues including, but not limited to facility access, emergency evacuations, injuries, theft, violence, and weapons.

**2.0 Scope**

This policy applies to all ETS administrative and academic support employees not covered by a contractual agreement with the seminary.

**3.0 Responsibility**

The interpretation, administration, and monitoring for compliance of this policy is the responsibility of the HR Administrator (EAP - Operations).

**4.0 Policy**

It is the policy of ETS to provide a safe and healthful work environment for all its employees, students, visitors, and other members of the ETS community, and to comply with environmental and safety laws and regulations. ETS will establish and maintain viable security measures to ensure that ETS facilities are safe and secure to the maximum extent possible. All employees bear responsibility for maintaining a safe and healthful environment.

In addition, this policy expressly prohibits any acts or threats of violence by any employee or former employee in or about its premises or elsewhere at any time. ETS will not condone any acts or threats of violence against its employees, students, or other members of the ETS community including visitors by any

individual on ETS premises at any time during which such individual is engaged in seminary activities.

Furthermore, this policy prohibits any person from bringing unauthorized firearms or other weapons onto ETS premises.

## **5.0 Practice/Procedure**

### **5.1 Facility Access**

ETS will establish viable security measures to ensure that ETS' facilities are properly secure and that access to the building(s) for the general public, employees, visitors and students are limited to seminary-related or approved activities.

### **5.2 Emergency Evacuations**

Employees are expected to report on-site emergencies such as fire or serious accident by calling 911 followed by a call to the EAP - Operations.

In case of an evacuation, employees are required to:

- Respond to evacuation notification, which may come in the form of an announcement from another employee issuing verbal instructions.
- Evacuate immediately using the nearest exit available, taking with them only their purse and/or wallet, and personal identification.
- Continue to proceed without stopping for any reason unless aiding a fellow employee to the nearest exit, or otherwise directed to do so by seminary leadership or her/his designee, or other safety professionals such as the Police or Fire Department.
- Assemble outside the building in a designated area.
- Remain in the assembly area until instructed to reenter the building by seminary leadership or emergency crews.

### **5.3 Injuries**

Any work-related illness or injury suffered by or otherwise identified by an ETS employee should be reported immediately to the employee's immediate supervisor. The supervisor or HR Administrator (EAP - Operations) will arrange for transportation of the injured/ill employee to the nearest medical facility for treatment. If it is determined that emergency medical attention is necessary, under no circumstances should the injured employee be allowed to drive to a health care facility on her or his own. Emergency cases should be transported by ambulance.

### **5.4 Thefts**

Thefts on ETS' premises shall be reported to the EAP - Operations who will be responsible for maintaining a log of such, and investigate and/or contact local authorities, where appropriate. The seminary is not responsible for reimbursement of personal loss as a result of theft on ETS' premises.

### **5.5 Violence and Weapons**

ETS expects a work environment that is free from acts of violence and threats to ensure the health and safety of all members of the ETS community. Acts or threats of violence are those acts, behaviors, or conduct that would lead a reasonable person to believe that he or she is in danger of physical or mental, verbal, or non-verbal harm, injury, or abuse. ETS will take prompt corrective action up to and including termination against any employee who engages in behavior that is threatening to life or property. Likewise, ETS will take appropriate action when dealing with non-employees who engage in such behavior. Such action may include notifying the police or other law enforcement personnel and prosecuting violators of this policy to the maximum extent of the law.

### **5.6 Duty to Report Suspicious Activity or Threats**

Employees have a duty to report any suspicious activity or event threatening the safety and security of ETS seminary leadership. Reports made pursuant to this policy will be held in confidence, to the maximum extent possible. ETS will not condone any form of retaliation against any employee who, in good faith, makes a report under this policy.

### **5.7 Investigation of Complaints**

Complaints of safety and security situations will be promptly investigated, and if found to be valid, immediate, and appropriate action will be taken. Such action may include:

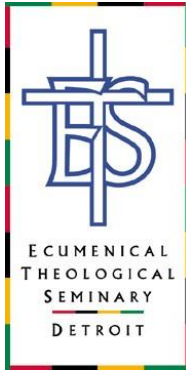
- Evacuation of the property.
- Notification of 911 emergency or local law enforcement action, if warranted.
- Immediate suspension or termination of an employee.

### **5.8 Documentation**

In all situations and in all circumstances, a complete and detailed log of events as outlined in this policy will be maintained by the HR Administrator (EAP - Operations).

## **Attachments to HR Policy 11.12**

None



**Attachment B: Drugs and Intoxicants**

<b>Supersedes:</b>	All existing Alcohol, Drug, and Intoxicant Policies
<b>Effective:</b>	May 19, 2006
<b>Revised</b>	June 14, 2020
<b>Pages:</b>	3

**1.0 Philosophy/Purpose**

The use, abuse and possession of alcohol and illegal drugs in the workplace are a threat to the health and safety of employees, and the general public. ETS is committed to providing a working environment free from alcohol and illegal drugs. This policy is designed to aid seminary leadership in ensuring a safe and healthful workplace for its employees, students, visitors, and other members of the ETS community.

**2.0 Scope**

This policy applies to all ETS administrative and academic support employees not covered by a contractual agreement with the seminary.

**3.0 Responsibility**

The interpretation, administration, and monitoring for compliance of this policy is the responsibility of the HR Administrator (EAP - Operations).

**4.0 Policy**

It is the policy of ETS to provide and maintain a drug-free workplace. The manufacture, use, possession, distribution, dispensing, or sale of controlled substances, alcoholic beverages, and illegal drugs on ETS premises, or when conducting business on behalf of ETS is prohibited. Reporting for work or working while under the influence of illegal drugs or alcohol is prohibited. Lawfully prescribed prescription drugs used in accordance with their instructions are not subject to this policy. However, reporting for work or working under an impairment caused by the abuse of lawfully prescribed drugs is prohibited. A violation of this policy may result in disciplinary and corrective action, up to and including termination.

## **5.0 Practice/Procedure**

### **5.1 General Information**

- 5.1.1** An employee may be subject to disciplinary and corrective action, up to and including termination, for unsatisfactory job performance caused by the use of alcohol, illegal drugs, or the illegal use of prescribed or over the counter drugs. Any employee who is convicted of or pleads guilty or nolo contendere to a drug or alcohol related offense must report such offense to the HR Administrator (EAP - Operations) within seven (7) days of the date of conviction. Failure to do so may result in disciplinary action, up to and including termination.
- 5.1.2** All employees will be provided with an ETS Drug-Free Workplace Policy Acknowledgement Form, which must be signed and returned to the HR Administrator (EAP - Operations).

### **5.2 Drug Testing**

- 5.2.1** ETS reserves the right to conduct testing of an employee who is reasonably suspected of using alcohol or illegally using drugs. An employee who refuses to submit to a drug or alcohol screening test may be subject to disciplinary and corrective action, up to and including termination. An employee whose use of illegal drugs or alcoholic beverages poses an immediate health or safety risk of others on ETS premises will be subject to immediate termination. Any employee who refuses to submit to a drug and alcohol screening test will be considered to have voluntarily resigned from employment with ETS.

Employees requested to submit to a drug and alcohol screening test must do so immediately or by a time otherwise specified by the HR Administrator (EAP - Operations). Employees may not delay in taking the test or otherwise cause the test to be delayed. Any employee who violates this provision will be considered to have voluntarily resigned from employment with ETS.

- 5.2.2** The results of any drug and/or alcohol screening test will remain confidential and limited to essential personnel, except as otherwise required by law. Reports from drug and/or alcohol testing will be forwarded to the HR Administrator (EAP - Operations) and will confirm only whether or not the employee tested positive for either drug or alcohol abuse.

### **5.3. Workplace Searches**

In order to safeguard the health and the property of ETS employees, students and other members of the ETS community, and to aid in the

prevention of the possession, use and sale of illegal drugs and alcohol on ETS premises, ETS reserves the right to question and conduct searches of employees and all other persons entering its premises, and to search personal belongings, offices, desks, files, or any other area of the premises when there is a reasonable suspicion of illegal drug or alcohol possession, use or sale. Employees who refuse to consent to a search may be subject to disciplinary and corrective action, up to and including termination. Any non-employee who refuses to consent to a search will be refused entry to ETS premises.

### **Attachments to HR Policy 11.11**

Drug-Free Workplace Policy Acknowledgement

**Policy No: 4.03**



## **Attachment C: Sexual and Other Unlawful Harassment**

<b>Supersedes:</b>	All existing Sexual and Harassment policies
<b>Effective:</b>	May 19, 2006
<b>Revised:</b>	June 13, 2020
<b>Pages:</b>	4

### **1.0 Philosophy/Purpose**

It is ETS' philosophy and practice to provide an environment that is free from sexual and other unlawful harassment. ETS is fully supportive of state and federal laws prohibiting the discrimination and harassment of any employee. ETS will take prompt investigative action in response to allegations of all forms of harassment and will take appropriate disciplinary and corrective action, where necessary.

### **2.0 Scope**

This policy applies to all ETS administrative and academic support employees not covered by a contractual agreement with the seminary.

### **3.0 Responsibility**

The interpretation, administration, and monitoring for compliance of this policy is the responsibility of the HR Administrator (EAP - Operations).

### **4.0 Policy**

ETS prohibits and will not tolerate the harassment of any employee on the basis of sex, gender, race, color, national origin, height, weight, religion, marital status, sexual orientation, family status, age, disability, or any other protected civil rights status. Prohibited forms of discriminatory harassment include, but are not limited to verbal, physical or visual harassment, unwanted sexual advances, and requests for sexual favors. Such harassment is a serious violation of state and federal law, as well as ETS' work rules and policies. Employees found to be in violation of this policy will be subject to disciplinary and corrective action, up to and including termination.

#### **4.1 Definitions**

**4.1.1 Harassment:** Is generally defined as unwelcome or offensive conduct in the workplace based on sex, gender, race, color, national origin, height, weight, religion, marital status, sexual orientation, family status, age, disability, or any other protected



civil rights status, which unreasonably interferes with another employee's working experience.

**4.1.2 Sexual Harassment:** Michigan state law defines sexual harassment in the Elliott-Larsen Civil Rights Act 453 of 1976 as amended by Public Act 202 of 1980.

Sexual harassment claims fall into two categories:

- **Quid pro quo:** harassment occurs when an employee is forced to choose between giving in to a superior's sexual demands or forfeiting an economic benefit such as a pay increase, a promotion, or continued employment.
- **Hostile environment:** occurs when sexual or other discriminatory conduct is so severed and pervasive that it interferes with an individual's performance, creates an intimidating, threatening or humiliating work environment, or perpetuates a situation that affects the employee's psychological well-being.

Sexual harassment takes on a variety of forms from subtle pressure to physical contact. Examples of behavior that may be considered sexual harassment can include:

- Persistent or repeated unwelcome flirting, advances or propositions, pressures for dates, sexual comments, or touching
- Sexually suggestive jokes, gestures, and comments, display of sexually oriented pictures, posters, or other material offensive to others
- Graphic or suggestive comments about an individual's dress or body, including sexually degrading words to describe an individual
- Preferential treatment or promise of preferential treatment in exchange for dates or sexual conduct
- Denial or threat of denial of employment, benefits or advancement in employment or education programs, for refusal to consent to sexual advances

## **5.0 Practice/Procedure**

### **5.1 Reporting of a Complaint**

ETS encourages individuals who believe they are being harassed to notify the offender firmly and promptly that the behavior is unwelcome. Any employee who believes he or she has been harassed in violation of this policy or who believes himself or herself to be the victim of any harassment in his or her employment should report such activity immediately. An employee may make such report to the highest on-site

ETS Officer available or the HR Administrator (EAP - Operations). Seminary personnel who have reports of harassment reported to them shall immediately discuss the allegation with the HR Administrator (EAP - Operations). If the incident involves an Officer of the Seminary, the employee shall report such activity to the Chair of the Board.

Individuals are urged to report the complaint within seventy-two (72) hours of occurrence or as soon as reasonably possible if extenuating circumstances exist. The initial report may be oral but must be followed by a written complaint that includes as many specific details as possible. Individuals who would like assistance in preparing a written report should contact the EAP - Operations.

Further, any employees who become aware of, or has any information regarding the harassment of oneself or another employee shall immediately report this information to the highest on-site ETS Officer available or the EAP - Operations. If the incident involves an Officer of the Seminary, the individual shall report such activity to the Chair of the Board or the Vice-Chair of the Board.

## 5.2 Investigation of a Complaint

ETS will investigate any and all reports of harassment and will promptly take any appropriate action necessary. Within seven (7) days, the HR Administrator (EAP - Operations) will establish a fact-finding response team to conduct an investigation. Members of response teams will consist of a minimum of three members and shall be established as follows:

Complaints filed by:	Against:	Response Team
Faculty, Staff, Vendors, Contractors, Visitors, and Students	Anyone except Faculty and Seminary Officers	President, HR Administrator one Vice President (if HR Admin and EAP - Operations are different people)
Faculty, Staff, Vendors, Contractors, Visitors or Students	Seminary Officers except for the President	Chair of the Board, President
Faculty, Staff, Vendors, Contractors, Visitors or Students	President	Chair of the Board, Vice Chair of the Board and One of the Board members as determined by Chair
Students	Faculty	HR Administrator one Vice President (if HR Admin and EAP - Operations are different people) Academic Dean Program Director

The response team conducts fact finding interviews, works with the parties involved, and compiles a report of its finding, and decision within thirty (30) days. The recommendation may:

- Dismiss the allegation
- Recommend mediation
- Place the accused on a leave of absence

Seminary leadership who learns of such incidents of harassment and fail to investigate or take other appropriate action may be subject to corrective action, up to and including termination. Any employee who makes a complaint knowing it to be false or who makes such complaint in reckless disregard of the truth will also be subject to disciplinary and corrective action, up to and including termination.

### **5.3 Resolution or Determination**

The final disposition of any formal sexual or other harassment complaint will be reported to the Board of Directors.

### **5.4 Documentation and Records**

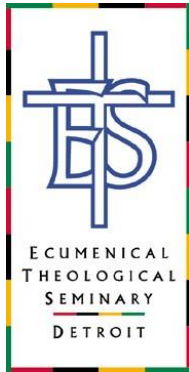
In all situations and in all circumstances, a complete and detailed log of events will be maintained by the investigating person(s) and reviewed on an ongoing and as-need basis.

### **5.5 Confidentiality**

Except otherwise permitted by law or required by a court order, the disclosure of information pertaining to a Sexual or Other Harassment case is prohibited. All records and files will be maintained separately in secured files in the same manner as other human resources information and documentation. All documentation and records shall not be placed in an employee's personnel file.

## **Attachments to HR Policy 4.03**

Sexual and Other Harassment Acknowledgement and Acceptance Form



**Subject:** Part II of ETS Campus Security Report  
(Campus Crime Statistics)

**Published:** July 1, 2009

**Revised:** June 14, 2020

**Pages:** 2

Title 34 of the Code of Federal Regulations at Sec. 668.46 requires ETS to prepare an annual security report that contains crime statistics that are reported to local police agencies or to a campus security authority for the three most recent calendar years. This report pertains to criminal activity that occurred on campus, in or on non-campus buildings or property, and on public property (as these locations are defined in 34 CFR Sec. 668.46) (a).

### OVERVIEW

To aid in understanding the crime statistics reported by ETS, the following points are underscored:

- The only building or property owned or controlled by ETS is its Administrative/Sanctuary Building at 2930 Woodward Avenue, Detroit, MI 48201, hereinafter referred to as the “campus building”. ETS does not own, control, or use any other building or property for its educational purposes, including non-campus buildings or properties, within the same reasonably contiguous geographic area, or elsewhere.
- ETS “public property” as defined in Sec. 668.46(a) (i.e., thoroughfares, streets, sidewalks, and parking facilities within the campus or immediately adjacent to and accessible from the campus) would include: a) its parking lot which is adjacent to the north and east sides of the campus building; b) the streets and sidewalks on Woodward Avenue (from Edmund Place north to the northern end of the ETS parking lot); and c) the streets and sidewalks on Edmund Place (from Woodward Avenue east to the eastern end of the ETS parking lot). The north and east boundaries of the parking lot are immediately adjacent to buildings not owned or controlled by ETS or are otherwise fenced in and not accessible from the campus. (See map at **Attachment A**, hereto.)
- Statistics recorded and reported by ETS include a geographic breakdown by location (i.e., on campus or on public property) as required by Sec. 688.46 (c) (4) and provide for the insertion of categories of prejudice and whether bodily injury was involved for any reported hate crimes as required by Sec. 688.46 (c) (3).

- Statistics to date for the three most recent calendar years concerning the occurrence of crimes on campus and on public property that were reported to local police agencies or to our CSA are set forth at **Attachment B**, hereto.

Criminal activity reported by ETS on Attachment B, hereto, includes:

- Any crime statistics in its annual security report for the calendar year in which the crime was reported to its campus security authority or administrative office pursuant to 34 CFR 688.46 (c) (2).
- Any hate crime (by category of prejudice) it reports pursuant to 34 CFR 688.46 (1) through (vii), and any other crime involving bodily injury reported to local police agencies or to a campus security authority, that manifest evidence that the victim was intentionally selected because of his or her actual or perceived race, gender, religion, sexual orientation, ethnicity, or disability. See 34 CFR 688.46 (c) (3).
- A geographic breakdown of the statistics reported under 34 CFR 688.46 (c) (1) and (3) according to whether they occurred on campus or on public property. See 34 CFR 688.46 (c) (4). (ETS has no dormitories or residential facilities for students and has no non-campus buildings or property.)
- Statistics reported by ETS pursuant to 34 CFR 688.46 (c) (1) and (3) **do not** include the identification of any victim or accused person, and **do not** include any crimes reported to a pastoral or professional counselor in contravention of 34 CFR 688.46 (c) (5) and (6).
- Statistics reported by ETS pursuant to 34 CFR 688.46 (c) (1) and (3) use the definitions of crimes provided in appendix A to this subpart and the Federal Bureau of Investigation's Uniform Crime Reporting (UCR) Hate Crime Data Collection Guidelines and Training Guide for Hate Crime Data Collection. See 34 CFR 688.46 (7).
- ETS will make a reasonable, good faith effort to obtain statistics required under 34 CFR 688.46 (c) (1) through (4).<sup>1</sup>

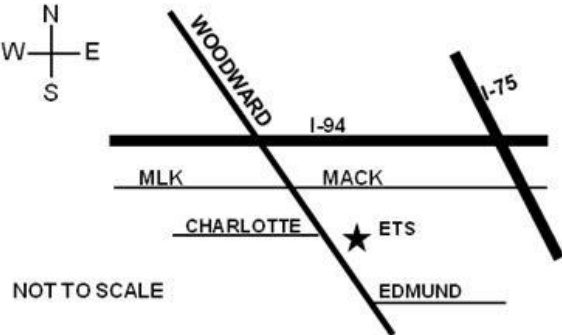
## **Attachments to Part II of ETS' Campus Security Report**

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<sup>1</sup> City of Detroit policy requires that requests for such data be submitted as a FOIA request to the Detroit Police Department through the City of Detroit Law Department. ETS will submit a FOIA request on or about the 15<sup>th</sup> of August each year in order to receive a response in time for preparation of its Annual Crime Report. Accordingly, crime statistics reported now will be amended by our October 2020 Annual Crime Report to include any data received in response to our FOIA request or subsequently reported to our EAP-Operations or CSA.

Attachment A—Map depicting ETS Campus and Public Property  
Attachment B—Crime Statistics to date

**Attachment A: ETS Campus and Public Property**



**Ecumenical Theological Seminary**  
**Campus Safety and Security Crime Statistics**

**Attachment B: Crime Statistics 2017-2019**

**Crime statistics to date** for the three most recent calendar years concerning the occurrence of crimes on campus and on public property that were reported to local police agencies or to our CSA or EAP - Operations.

<b>CRIMINAL OFFENSE</b>	<b>LOCATION</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
Murder/Non-negligent Manslaughter	On Campus	0	0	0
	Public Property	0	0	0
Manslaughter by Negligence	On Campus	0	0	0
	Public Property	0	0	0
Rape	On Campus	0	0	0
	Public Property	0	0	0
Fondling	On Campus	0	0	0
	Public Property	0	0	0
Incest	On Campus	0	0	0
	Public Property	0	0	0
Statutory Rape	On Campus	0	0	0
	Public Property	0	0	0
Robbery	On Campus	0	0	0
	Public Property	0	0	0
Aggravated Assault	On Campus	0	0	0
	Public Property	0	0	0
Arson	On Campus	0	0	0
	Public Property	0	0	0
<b>VAWA OFFENSES</b>	<b>LOCATION</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
Domestic Violence	On Campus	0	0	0
	Public Property	0	0	0
Dating Violence	On Campus	0	0	0
	Public Property	0	0	0
Stalking	On Campus	0	0	0
	Public Property	0	0	0
<b>ARRESTS</b>	<b>LOCATION</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
Weapons: Carrying, Possessing, Etc.	On Campus	0	0	0
	Public Property	0	0	0
Drug Abuse Violations	On Campus	0	0	0
	Public Property	0	0	0
Liquor Law Violations	On Campus	0	0	0
	Public Property	0	0	0
<b>DISCIPLINARY ACTIONS</b>	<b>LOCATION</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
Weapons: Carrying, Possessing, Etc.	On Campus	0	0	0
	Public Property	0	0	0
Drug Abuse Violation	On Campus	0	0	0
	Public Property	0	2	0
Liquor Law Violations	On Campus	0	0	0
	Public Property	0	0	0
<b>UNFOUNDED CRIMES</b>	<b>LOCATION</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
Total Unfounded Crimes	On Campus	0	0	0



**Attachment B: Crime Statistics 2017-2019**

**Crime statistics to date** for the three most recent calendar years concerning the occurrence of crimes on campus and on public property that were reported to local police agencies or to our CSA or EAP - Operations.

<b>2017 Criminal Offenses</b>	<b>Location</b>	<b>Race</b>	<b>Religion</b>	<b>Sexual Orientation</b>	<b>Gender</b>	<b>Gender Identity</b>	<b>Disability</b>	<b>Ethnicity</b>	<b>National Origin</b>
Murder/Non-negligent manslaughter	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Rape	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Fondling	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Incest	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Statutory Rape	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Robbery	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Aggravated Assault	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Burglary	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Motor Vehicle Theft	On Campus	0		0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Arson	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Simple Assault	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Destruction /Damage Vandalism of Property	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0

<b>2018 Criminal Offense</b>	<b>Location</b>	<b>Race</b>	<b>Religion</b>	<b>Sexual Orientation</b>	<b>Gender</b>	<b>Gender Identity</b>	<b>Disability</b>	<b>Ethnicity</b>	<b>National Origin</b>
Murder/Non-negligent manslaughter	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Rape	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Fondling	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Incest	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Statutory Rape	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Robbery	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Aggravated Assault	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Burglary	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Motor Vehicle Theft	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Arson	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Simple Assault	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Destruction/Damage	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0

<b>2019 Criminal Offense</b>	<b>Location</b>	<b>Race</b>	<b>Religion</b>	<b>Sexual Orientation</b>	<b>Gender</b>	<b>Gender Identity</b>	<b>Disability</b>	<b>Ethnicity</b>	<b>National Origin</b>
Murder/Non-negligent manslaughter	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Rape	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Fondling	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Incest	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Statutory Rape Statutory Rape	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Robbery	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Aggravated Assault	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Burglary	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Motor Vehicle Theft	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Arson	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Simple Assault	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0
Destruction /Damage	On Campus	0	0	0	0	0	0	0	0
	Public Property	0	0	0	0	0	0	0	0