The Campus Safety and Security Report and the Fire Safety Report provide information to help members of the campus community safeguard themselves, their families, and the community as they engage in the life of Covenant Seminary. The reports include information about security, missing persons, fire safety, the sexual misconduct policy, and the alcohol and drug use policy. The Seminary is required by the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act of 1990, the Campus Sexual Violence Act, the Violence Against Women Act, the Higher Education Opportunity Act of 2008, and the Drug Free Schools and Community Act to publish this information and distribute it to faculty, staff and students.

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act of 1990 and the amendments to that act of 1992, 1998, 2008, and 2013 also require educational institutions to make statistics available concerning the occurrence of certain crimes reported to Covenant Seminary’s Public Safety Office (PSO) or to local police agencies. The PSO does not investigate crime reports to determine whether a crime actually occurred, but relies on the expertise of local law enforcement for such investigation. Unless local law enforcement is able to determine that a reported crime did not occur, the PSO will publish a report of the crime.

Though reports of crime are rare at Covenant Seminary, the PSO assembles any Clery crime statistics available by combining crime reports originating from the campus community and from local law enforcement agencies. Reports originating from the community include any reports brought by Seminary officials who have significant responsibilities for student and campus activities. Such officials, by nature of their positions, are legally required to report any crimes of which they are aware to the PSO. The PSO publishes statistics each September reflecting all credible crime reports received in the annual Campus Safety and Security Report (which is part of this document) which were committed in the three calendar years preceding its publication. If you would like more details regarding any crimes reported below, please contact Peter Render, Manager of Facilities and Campus Safety, at (314) 392-4166 or David Brown, Senior Director of Campus Operations, at (314) 392-4165.
Crime Statistics

Crime statistics, as required by the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, are recorded below. There are several crime categories specified by the act. For each of these categories, the number or crime reports received by the PSO is recorded. The information is given for the preceding three years and for several geographical locations.

### On Campus Buildings

<table>
<thead>
<tr>
<th>Crime Category</th>
<th>2012</th>
<th>2013</th>
<th>2014</th>
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</thead>
<tbody>
<tr>
<td>Aggravated Assault</td>
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<td>0</td>
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<tr>
<td>Arson</td>
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<tr>
<td>Burglary</td>
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<tr>
<td>Dating Violence</td>
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<tr>
<td>Domestic Violence</td>
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<tr>
<td>Motor Vehicle Theft</td>
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<tr>
<td>Murder/Non-Negligent Manslaughter</td>
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<tr>
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<tr>
<td>Robbery</td>
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<tr>
<td>Sex Offences – Forcible</td>
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<tr>
<td>Sex Offences - Non-Forcible</td>
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<tr>
<td>Rape</td>
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<td>Fondling</td>
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<td>Incest</td>
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<tr>
<td>Statutory Rape</td>
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<tr>
<td>Stalking</td>
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</tbody>
</table>

Referrals for disciplinary action:

- Drug-related Violations: 0 0 0
- Illegal Weapons Possession: 0 0 0
- Liquor Law Violations: 0 0 0

Arrests:

- Drug-related Violations (Arrests): 0 0 0
- Illegal Weapons Possession (Arrests): 0 0 0
- Liquor Law Violations (Arrests): 0 0 0
- Murder/Non-Negligent Manslaughter: 0 0 0
- Negligent Manslaughter: 0 0 0

### On Campus Residences

<table>
<thead>
<tr>
<th>Crime Category</th>
<th>2012</th>
<th>2013</th>
<th>2014</th>
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</thead>
<tbody>
<tr>
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<tr>
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<tr>
<td>Sex Offences - Non-Forcible</td>
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<tr>
<td>Statutory Rape</td>
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<tr>
<td>Stalking</td>
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</tr>
</tbody>
</table>

Referrals for disciplinary action:

- Drug-related Violations: 0 0 0
- Illegal Weapons Possession: 0 0 0
- Liquor Law Violations: 0 0 0
## Non Campus Property - 8500 Block of Gulf Drive

<table>
<thead>
<tr>
<th>Crime Type</th>
<th>2012</th>
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<th>2014</th>
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</thead>
<tbody>
<tr>
<td>Aggravated Assault</td>
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<td>Dating Violence</td>
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## Public Property - Conway Park

<table>
<thead>
<tr>
<th>Crime Type</th>
<th>2012</th>
<th>2013</th>
<th>2014</th>
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<tbody>
<tr>
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<tr>
<td>Murder/Non-Negligent Manslaughter</td>
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<tr>
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<tr>
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</tr>
<tr>
<td>Stalking</td>
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</tbody>
</table>

## Analyses

- **Non Campus Property - 8500 Block of Gulf Drive**
  - **Aggravated Assault**: 0 in all years
  - **Arson**: 0 in all years
  - **Burglary**: 0 in all years
  - **Dating Violence**: 0 in all years
  - **Domestic Violence**: 0 in all years
  - **Motor Vehicle Theft**: 0 in all years
  - **Murder/Non-Negligent Manslaughter**: 0 in all years
  - **Negligent Manslaughter**: 0 in all years
  - **Robbery**: 0 in all years
  - **Sex Offences - Forcible**: 0 in all years
  - **Sex Offences - Non-Forcible**: 0 in all years
  - **Rape**: 0 in all years
  - **Fondling**: 0 in all years
  - **Incest**: 0 in all years
  - **Statutory Rape**: 0 in all years
  - **Stalking**: 0 in all years

- **Public Property - Conway Park**
  - **Aggravated Assault**: 0 in all years
  - **Arson**: 0 in all years
  - **Burglary**: 0 in all years
  - **Dating Violence**: 0 in all years
  - **Domestic Violence**: 0 in all years
  - **Motor Vehicle Theft**: 0 in all years
  - **Murder/Non-Negligent Manslaughter**: 0 in all years
  - **Negligent Manslaughter**: 0 in all years
  - **Robbery**: 0 in all years
  - **Sex Offences - Forcible**: 0 in all years
  - **Sex Offences - Non-Forcible**: 0 in all years
  - **Rape**: 0 in all years
  - **Fondling**: 0 in all years
  - **Incest**: 0 in all years
  - **Statutory Rape**: 0 in all years
  - **Stalking**: 0 in all years
Arrests:
Drug-related Violations (Arrests)  0 0 0
Illegal Weapons Possession (Arrests)  0 0 0
Liquor Law Violations (Arrests)  0 0 0
Murder/Non-Negligent Manslaughter  0 0 0
Negligent Manslaughter  0 0 0

No hate crimes were reported for the years 2012, 2013, or 2014.
There were no crimes or incidents investigated by law enforcement authorities and determined to be unfounded in 2014.

Fire Safety Statistics—Campus Residences

The numbers below reflect fires in the residences located on the Covenant Seminary campus which were reported to the PSO for the years shown.

2012 Total Number of Fires in Campus Residences:
In 2012, there were no fires to report for 400 Covenant Lane.
In 2012, there were no fires to report for 406 Covenant Lane.
In 2012, there were no fires to report for 412 Covenant Lane.
In 2012, there were no fires to report for 418 Covenant Lane.
In 2012, there were no fires to report for 424 Covenant Lane.
In 2012, there were no fires to report for 430 Covenant Lane.
In 2012, there were no fires to report for 441 Covenant Lane.
In 2012, there were no fires to report for 491 Covenant Lane.
In 2012, there were no fires to report for 12262 Conway Road.
In 2012, there were no fires to report for 12270 Conway Road.
In 2012, there were no fires to report for 12304 Conway Road.
In 2012, there were no fires to report for 32 Balcon Estates.
In 2012, there were no fires to report for 34 Balcon Estates.

2013 Total Number of Fires in Campus Residences:
In 2013, there were no fires to report for 400 Covenant Lane.
In 2013, there were no fires to report for 406 Covenant Lane.
In 2013, there were no fires to report for 412 Covenant Lane.
In 2013, there were no fires to report for 418 Covenant Lane.
In 2013, there were no fires to report for 424 Covenant Lane.
In 2013, there were no fires to report for 430 Covenant Lane.
In 2013, there were no fires to report for 441 Covenant Lane.
In 2013, there were no fires to report for 491 Covenant Lane.
In 2013, there were no fires to report for 12262 Conway Road.
In 2013, there were no fires to report for 12270 Conway Road.
In 2013, there were no fires to report for 12304 Conway Road.
In 2013, there were no fires to report for 32 Balcon Estates.
In 2013, there were no fires to report for 34 Balcon Estates.

2014 Total Number of Fires in Campus Residences:
In 2014, there were no fires to report for 400 Covenant Lane.
In 2014, there were no fires to report for 406 Covenant Lane.
In 2014, there were no fires to report for 412 Covenant Lane.
In 2014, there were no fires to report for 418 Covenant Lane.
In 2014, there were no fires to report for 424 Covenant Lane.
In 2014, there were no fires to report for 430 Covenant Lane.
In 2014, there were no fires to report for 441 Covenant Lane.
In 2014, there were no fires to report for 491 Covenant Lane.
In 2014, there were no fires to report for 12262 Conway Road.
In 2014, there were no fires to report for 12270 Conway Road.
In 2014, there were no fires to report for 12304 Conway Road.
In 2014, there were no fires to report for 32 Balcon Estates.
In 2014, there were no fires to report for 34 Balcon Estates.
Fire Safety Report

Fire Safety Education

Steps for reducing the risk of fire and for responding in case of a fire are provided in the Student Handbook. Covenant Seminary staff are provided training in the use of fire extinguishers upon request.

Fire Prevention Policies for Campus Housing

1. No items are to be stored in the mechanical closets in campus apartments, and items may not be placed near furnace air return vents.
2. Only persons employed by Covenant Seminary may work on or repair heating or air conditioning units or other mechanical equipment in the apartments.
3. No items of any kind are to be left in common hallway areas or on the building stoops.
4. Candles are not permitted in any campus housing unit. Incense, potpourri, and/or other items that generate open flame are prohibited in apartments. Electric potpourri cookers are acceptable.
5. Grills must be used outside and must be pulled away from the building and from under decks before use.
6. Cooking may only be done in the kitchen. This includes cooking done in portable appliances such as toasters, rice cookers, electric water pots, and coffee makers.
7. Smoking is prohibited in all Seminary-owned housing.
8. Fire codes strictly prohibit children from playing in apartment building hallways at any time, including winter.

Student Housing Evacuation Procedures

1. Know the location of fire extinguishers and fire exits in your building and know how to use them. Teach your family what to do in case of fire. You can find useful resources at www.nfpa.org, www.redcross.org, and www.usfa.dhs.gov. Training and information are also available through the Housing Office at (314) 392-4164.
2. If the fire alarm sounds, quickly evacuate the building. CAUTION: the building evacuation alarm only rings in the building; you must also call 911 and report the fire by phone.
   a. **Do not try to save possessions.** Exit the building immediately. You might have no more than two minutes to escape safely.
   b. **Never open doors that are hot to the touch.** Feel a closed door with the back of your hand at the top of the door, the doorknob, and the crack between the door and jamb before opening. Even if the door is cool, brace your shoulder against the door and open cautiously. Be ready to slam the door shut and use a secondary escape route if heat and smoke come in the open door.
   c. **If smoke, heat, or flames block your exit route,** close yourself in a room with an exterior window and place a towel under the door. If you have a cell phone, call 911 and tell the 911 dispatcher where you are. Open the window—do not break it—at the top and bottom if possible and signal to firefighters with a flashlight or bright colored cloth.
   d. **Once you are outside the building, do not go back in.** Once you are safely outside, call 911. Notify the 911 dispatcher if someone is still in the building.
   e. **Avoid smoke.** Smoke is toxic and can disorient and quickly suffocate a victim. **If you cannot avoid escaping through smoke,** crawl under the smoke and cover your mouth.
3. Once outside go immediately to your designated assembly area (see #4 below) and see
that everyone is accounted for. If there is a phone available, contact the Safety and Security dispatcher at (314) 581-7212. Keep streets, fire lanes, hydrants and walkways clear for emergency vehicles and crews.

4. Evacuation Areas:
   a. Residents of apartments 400-441 should assemble behind Edwards Hall at the basketball courts.
   b. Residents of the Conway Rd. homes should assemble on the grassy area behind the dorm homes.

5. If emergency crews request assistance, assist as you are able.

6. Covenant Seminary emergency response staff may set up an Emergency Command Post near the emergency site. Keep clear of the Command Post unless you have official business. (Please contact Peter Render at (314) 392-4166 or peter.render@covenantseminary.edu with any questions.)

7. DO NOT RETURN TO AN EVACUATED BUILDING unless told to do so by a Seminary official, firefighter, or police officer.

**Reporting Fires**

If you cannot immediately extinguish a fire, evacuate the building and **call the Creve Coeur Fire Department at 911 or (314) 737-4600.** Whether or not Fire Department services are requested, all fires must be reported to the Public Safety Office through one of the following parties:

- Safety and Security Dispatcher: (314) 581-7212
- Manager of Campus Safety (Peter Render): (314) 392-4166 or (314) 713-9964
- Senior Director of Operations (David Brown): (314) 392-4165 or (314) 581-8258

**Fire Drills**

An evacuation fire drill for all campus residents was conducted on October 6, 2014. All residents were encouraged, but not required, to participate. Regular fire drills are conducted each fall, usually during National Fire Safety Week, and one is planned for the week of October 5, 2015.

**Other Planned Improvements**

Additional fire safety training will be incorporated as needed, but has not been planned at this time.

**Fire Safety and Sprinkler Equipment**

32 Balcon Estates: The building is equipped with a multi-purpose (ABC) fire extinguisher which is inspected by housing maintenance staff quarterly and annually by a professional inspection company. A system of battery-operated smoke detectors sounds localized alarms when detectors sense smoke in the area.

34 Balcon Estates: The building is equipped with a multi-purpose (ABC) fire extinguisher which is inspected by housing maintenance staff quarterly and annually by a professional inspection company. A system of battery-operated smoke detectors sounds localized alarms when detectors sense smoke in the area.

400 Covenant Lane: Each apartment is equipped with a 1.5 hour fire-rated entry door and with a multi-purpose (ABC) fire extinguisher. Fire extinguishers are inspected by housing maintenance staff quarterly and annually by a professional inspection company. The walls, ceilings, and floors of each apartment are also fire rated to prevent the spread of fire. The
building has a hardwired smoke detection system which sounds a localized alarm when a detector senses smoke in an area. Detectors are located in each apartment. Additionally, each apartment and all common areas are protected by a water-based sprinkler system. The sprinkler system, when activated, will discharge water from the affected sprinkler head(s) and will activate an audible alarm throughout the building.

406 Covenant Lane: Each apartment is equipped with a 1.5 hour fire-rated entry door and with a multi-purpose (ABC) fire extinguisher. Fire extinguishers are inspected by housing maintenance staff quarterly and annually by a professional inspection company. The walls, ceilings, and floors of each apartment are also fire rated to prevent the spread of fire. The building has a hardwired smoke detection system which sounds a localized alarm when a detector senses smoke in an area. Detectors are located in each apartment. Additionally, each apartment and all common areas are protected by a water-based sprinkler system. The sprinkler system, when activated, will discharge water from the affected sprinkler head(s) and will activate an audible alarm throughout the building.

412 Covenant Lane: Each apartment is equipped with a 1.5 hour fire-rated entry door and with a multi-purpose (ABC) fire extinguisher. Fire extinguishers are inspected by housing maintenance staff quarterly and annually by a professional inspection company. The walls, ceilings, and floors of each apartment are also fire rated to prevent the spread of fire. The building has a hardwired smoke detection system which sounds a localized alarm when a detector senses smoke in an area. Detectors are located in each apartment. Additionally, each apartment and all common areas are protected by a water-based sprinkler system. The sprinkler system, when activated, will discharge water from the affected sprinkler head(s) and will activate an audible alarm throughout the building.

418 Covenant Lane: Each apartment is equipped with a 1.5 hour fire-rated entry door and with a multi-purpose (ABC) fire extinguisher. Fire extinguishers are inspected by housing maintenance staff quarterly and annually by a professional inspection company. The walls, ceilings, and floors of each apartment are also fire rated to prevent the spread of fire. The building has a hardwired smoke detection system which sounds a localized alarm when a detector senses smoke in an area. Detectors are located in each apartment. Additionally, each apartment and all common areas are protected by a water-based sprinkler system. The sprinkler system, when activated, will discharge water from the affected sprinkler head(s) and will activate an audible alarm throughout the building.

424 Covenant Lane: Each apartment is equipped with a 1.5 hour fire-rated entry door and with a multi-purpose (ABC) fire extinguisher. Fire extinguishers are inspected by housing maintenance staff quarterly and annually by a professional inspection company. The walls, ceilings, and floors of each apartment are also fire rated to prevent the spread of fire. The building has a hardwired smoke detection system which sounds a localized alarm when a detector senses smoke in an area. Detectors are located in each apartment. Additionally, each apartment and all common areas are protected by a water-based sprinkler system. The sprinkler system, when activated, will discharge water from the affected sprinkler head(s) and will activate an audible alarm throughout the building.

430 Covenant Lane: Each apartment is equipped with a 1.5 hour fire-rated entry door and with a multi-purpose (ABC) fire extinguisher. Fire extinguishers are inspected by housing maintenance staff quarterly and annually by a professional inspection company. The walls, ceilings, and floors of each apartment are also fire rated to prevent the spread of fire. The building has a hardwired smoke detection system which sounds a localized alarm when a
detector senses smoke in an area. Detectors are located in each apartment. Additionally, each apartment and all common areas are protected by a water-based sprinkler system. The sprinkler system, when activated, will discharge water from the affected sprinkler head(s) and will activate an audible alarm throughout the building.

441 Covenant Lane: Each apartment is equipped with a 1.5 hour fire-rated entry door and with a multi-purpose (ABC) fire extinguisher. Fire extinguishers are inspected by housing maintenance staff quarterly and annually by a professional inspection company. The walls, ceilings, and floors of each apartment are also fire rated to prevent the spread of fire. The building has a hardwired smoke detection system which sounds a localized alarm when a detector senses smoke in an area. Detectors are located in each apartment. Additionally, each apartment and all common areas are protected by a water-based sprinkler system. The sprinkler system, when activated, will discharge water from the affected sprinkler head(s) and will activate an audible alarm throughout the building.

491 Covenant Lane: The building is equipped with two multi-purpose (ABC) fire extinguishers which are inspected by housing maintenance staff quarterly and annually by a professional inspection company. A system of battery-operated smoke detectors sounds localized alarms when detectors sense smoke in the area.

12304 Conway Rd: The building is equipped with a multi-purpose (ABC) fire extinguisher which is inspected by housing maintenance staff quarterly and annually by a professional inspection company. A hardwired smoke detection system sounds a localized alarm when a detector senses smoke in the area.

12270 Conway Rd: The building is equipped with a multi-purpose (ABC) fire extinguisher which is inspected by housing maintenance staff quarterly and annually by a professional inspection company. A system of battery-operated smoke detectors sounds localized alarms when detectors sense smoke in the area.

12262 Conway Rd: The building is equipped with two multi-purpose (ABC) fire extinguishers which are inspected by housing maintenance staff quarterly and annually by a professional inspection company. A hardwired smoke detection system sounds a localized alarm when a detector senses smoke in the area.
Campus Safety & Security Report

Please remember, even though Covenant Seminary is a Christian community, we live in a fallen world. As a result, you need to use a common-sense approach to your personal safety and protection of your belongings on campus. Forming a few basic habits will improve your personal safety as you enjoy life at the Seminary.

1. Keep your valuables locked up at all times.
2. Keep the doors and windows locked to your apartment or room.
3. Do not walk alone at night.
4. Walk on lighted and well-traveled paths, sidewalks or streets.
5. Keep your vehicle locked at all times.

All Seminary students and staff are asked to assist in making the campus as safe as possible by being alert to suspicious situations and promptly reporting them.

Reporting Crimes and Suspicious Behavior

For medical emergencies or life-threatening situations call 911.

Police: 911 or (314) 737-4600
Fire: 911 or (314) 432-5570
Ambulance: 911

Emergencies: 911
Safety and Security Dispatcher (314) 581-7212
Manager of Campus Safety (Peter Render) (314) 392-4166 or (314) 713-9964
Senior Director of Operations (David Brown) (314) 392-4165 or (314) 581-8258

Reporting Crime:
Safety and Security Dispatcher: (314) 581-7212
Manager of Campus Safety (Peter Render) (314) 392-4166 or (314) 713-9964
Senior Director of Operations (David Brown) (314) 392-4165 or (314) 581-8258
Dean of Students (Mike Higgins) (314) 392-4154 or (314) 303-7014
Director of Housing (Joe Peterka) (314) 392-4164 or (314) 581-8257
Resident Manager (Eileen May) (706) 288-7966

Counseling:
Director of Student Life (Mark McElmurry) (314) 392-4153
Associate Dean of Students (Suzanne Bates) (314) 392-4157

The individuals listed above can respond quickly to improve the safety of the campus, enlisting the services of local law enforcement if necessary. These persons may also initiate Timely Warning reports (see “Timely Warnings” below) and will keep any records necessary for the annual publication of crime statistics.

Campus Security is a Team Effort

Covenant Seminary has an open campus. While this affords freedom of movement for the campus community, it also means that access to campus facilities is not limited to members of
the campus community. It is essential that all employees and students take precautions to avoid incidents with unwelcome campus visitors. Anyone who is concerned about the behavior of a visitor on campus should immediately contact campus Public Safety personnel (314-581-7212) or the West County Dispatch at (314) 737-4600. Students are also urged to keep watch on each other’s vehicles and personal possessions and to help control access to the buildings by securing doors and taking notice of strangers in the residence areas.

**Reporting Criminal Offenses**

If you are a victim of or witness to any on-campus criminal offense, call the West County Dispatch at (314) 737-4600. *In the event of a life-threatening situation, immediately call 911.*

All students and Seminary personnel should report any crime or security violation to the campus Public Safety Office (PSO), even though the police may already have been notified, by calling (314) 581-7212 or by contacting any of the people listed above under “Important Phone Numbers: Reporting Crime.”

Criminal actions or campus incidents are filed with the PSO on an Incident Report form. While the rights and privacy of the person reporting the incident will be respected, the PSO may be required to report certain crime information to local law enforcement. If necessary for the safety of the campus community, certain information may also be disseminated through student mail, faculty/staff newsletters, chapel announcements, the housing department, email, and Portal. Any such announcement would include information designed to aid in the prevention of similar occurrences and to protect the identity of the person reporting.

**Reporting Crimes to the Creve Coeur Police**

Covenant Seminary is in St. Louis County, and the jurisdictional law enforcement agencies are the Creve Coeur and Town & Country Police Departments. Covenant Seminary has no official mutual agreement with these police departments; however, Covenant Seminary is committed to reporting criminal incidents on campus to local police and to cooperating fully with them on matters that necessitate their intervention. The PSO will also report to and cooperate with State of Missouri, City of St. Louis, and other law enforcement agencies as necessary.

**Campus Security Authorities**

Campus Security Authorities are Seminary personnel who are required by law to notify the PSO when they receive credible reports of specific types of crimes committed on Seminary property (including Gulf Drive) and in Conway Park. Campus Security Authorities include all Public Safety personnel (for a list of Public Safety personnel, please contact Peter Render at (314) 392-4166 or peter.render@covenantseminary.edu and everyone listed under “Important Phone Numbers: Reporting Crime” above. Additionally, Seminary officials who have significant responsibility for student and campus activities qualify as campus security authorities. If you have any question about whether a person is a campus security authority, please contact Peter Render, Manager of Facilities and Campus Safety, at (314) 392-4166 or peter.render@covenantseminary.edu.

**Voluntary, Confidential Reporting**

Covenant Seminary does not provide an anonymous crime reporting service. For further information on reporting crimes see the “Reporting Criminal Offenses” section above.
Professional and Pastoral Counselors Excluded from Reporting Requirements

In order to ensure that victims have access to confidential counseling, professional and pastoral counselors (as defined by Clery Act regulations) are not required to report crimes discussed with them in their roles as counselors. The PSO, in turn, is not expected to have knowledge of such crimes and is not responsible to report them. Covenant Seminary does not explicitly encourage professional and pastoral counselors to inform counselees of the institution’s crime reporting procedures described under “Reporting Criminal Offenses” above.

Public Safety Office

Covenant Seminary’s security and safety programs are managed through the Public Safety Office (PSO), an arm of the Facilities Department. The title Public Safety Office distinguishes safety and security from other Facilities Department functions and conveys the Seminary’s dedication to a secure environment suitable to the mission of equipping students for ministry.

Public Safety Personnel

Public Safety personnel make nightly inspections of campus lighting and note insufficient or non-working lights on the daily report. Lamps are positioned along main walking paths and at building entrances and are lighted after dark. Bushes, trees and shrubs on campus are pruned regularly, and the grounds department inspects the campus for possible visibility or security problems. Door and lock hardware in public buildings is tested daily to ensure proper operation. Any report of malfunction that would compromise building security is treated as a high priority by maintenance personnel.

Public Safety personnel have the authority to question and check the identification of any person on campus in fulfillment of their assigned responsibilities. While on duty they may enter all public areas of the campus, in accordance with their assigned responsibilities, and may call on the Creve Coeur and Town & County Police Departments for the arrest of trespassers or persons involved in criminal activities. All non-residence buildings are checked several times per day to ensure that they are being locked and unlocked at the appropriate times. Door and lock hardware in public buildings is checked daily by Public Safety personnel to ensure proper operation. Any report of malfunction that would compromise building security is treated as a high priority by Public Safety and Maintenance personnel.

Public Safety personnel may also issue traffic tickets and warnings as necessary to safeguard the campus community and to ensure orderly use of campus parking lots and traffic lanes. They have no authority to make arrests or apprehend violators on or off the campus. All incidents in which arrests and/or apprehension are possible are referred to the Creve Coeur or Town & Country Police.

All matters on the Covenant Seminary campus and properties requiring the attention of professional security personnel are referred to local law enforcement. The PSO is not a security department, nor does Covenant Seminary maintain a security department.

Crime Prevention Programs

Covenant Seminary’s campus safety program focuses on crime prevention. A major component of this program is the daily Public Safety rounds. Campus Public Safety personnel check all non-residence buildings several times per day to ensure that they are being locked and
unlocked at the appropriate times. Any questions or concerns about these rounds, reports of campus lighting that is not working, or questions about traffic control (also see “Parking and Driving” in the Student Handbook), may be directed to Peter Render, Manager of Facilities and Campus Safety, at (314) 392-4166 or peter.render@covenantseminary.edu.

The Housing Handbook and Student Handbook advise students in procedures to avoid becoming victims of crime and to ensure general safety on campus. These procedures are reemphasized and expanded in mandatory on-campus housing meetings once per year. In order to respond to actual incidents or threats, crime prevention announcements may also be made during weekly chapel announcements and in the weekly school newsletter.

Building Access
Covenant Seminary has on-staff Public Safety personnel who lock and unlock reserved campus spaces three times daily. Non-residence buildings are locked nightly by campus Public Safety personnel, and they are unlocked during morning rounds beginning at 7:00. Non-residence buildings except Edwards Hall and the Library remain locked throughout the day on Saturday, unless they are being used for weekend classes or events. The Community Center is normally open from 8:00-6:00 on Saturdays during the fall and spring semesters. During breaks, holidays, summer and January terms, and to accommodate special events, Community Center hours may vary. All non-residence buildings remain locked throughout the day on Sunday unless they are reserved for an event. Access to these areas after hours is limited to persons who have offices in the buildings or to persons who have obtained permission from appropriate Seminary officials or the PSO. All other persons will be asked to leave the premises.

Access to residential apartments and homes is limited to the residents of the buildings, their guests, and authorized Covenant Seminary personnel who are performing the assigned duties of their position. Keys to residential apartments and homes are issued only to the above parties, and campus residents are urged to lock their doors even when they are home. Residence keys are produced and issued only by the Facilities Department. Under no circumstances are residents or Seminary staff members permitted to have keys duplicated or produced by a hardware store, locksmith, or other outside vendor. All Seminary personnel are expected to announce themselves prior to entering any residence area. When non-Seminary personnel, outside contractors for example, are scheduled to work in a campus residence, the resident will be given prior notification to expect the non-Seminary worker.

Preparation of Crime Statistics
The PSO is required annually to publish credible reports of specific types of crimes committed on Seminary property (including Gulf Drive) and in Conway Park. The types of crimes in questions are as follows: arson, motor vehicle theft, burglary, aggravated assault, robbery, sex offenses, domestic violence, dating violence, stalking, and criminal homicide. The PSO is also required to publish reports of larceny-theft, simple assault, intimidation, and destruction/damage/vandalism of property, or any other crime involving bodily injury if it is reported that the crime was a hate crime. Hate crimes are those in which the victim is intentionally selected because of the perpetrator’s bias regarding race, gender, gender identity, religion, sexual orientation, ethnicity/national origin, or disability.

The PSO will publish credible reports of such crimes whether or not the crimes are reported to the police. The PSO does not investigate crime reports to determine whether a crime actually occurred, but relies on the expertise of local law enforcement for such investigation. Unless local law enforcement is able to determine that a reported crime did not occur, the PSO will publish a report of the crime. The PSO gathers crime reports through direct reporting to Public.
Safety personnel, reports relayed by Campus Security Authorities (see “Campus Security Authorities” above), and information gathered from local law enforcement agencies.

**Fire and Medical Emergencies**

Covenant Seminary relies upon the City of Creve Coeur and the City of Town & Country for emergency fire protection services. Medical emergencies are responded to by these cities as well as medical centers in the surrounding area.

**Non-campus Student Organizations**

Covenant Seminary does not recognize or monitor any non-campus, student organizations.

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**Emergency Notification and Evacuation**

**Immediate Emergency Notifications**

Emergency Response planning is important for any organization. In recognition of this Covenant Seminary has implemented the following emergency notification procedures.

The campus PSO will immediately notify the campus community of any report received from federal, state, or local authorities of a significant emergency or dangerous situation threatening the health or safety of students or staff on campus. If such a report made to Covenant Seminary staff is not from a government official but appears credible, it is to be relayed immediately to the PSO. Public Safety staff members will notify local municipal authorities when appropriate and will attempt to confirm the report by direct observation if it is safe to do so. If Public Safety personnel cannot verify the reported threat, they will ask municipal authorities for assistance. When Public Safety staff members have confirmation of the existence of the reported threat, they will immediately initiate an emergency notification to appropriate members of the campus community. Public Safety staff will determine the content of the notification and the appropriate segments of the campus community to be contacted. These decisions will be made with the goal of aiding those affected to protect themselves while avoiding unnecessary alarm. The release of a warning would be delayed only if, according to the judgment of the Public Safety staff, the warning would compromise efforts to contain the threat, assist a victim, or otherwise respond to the emergency.

The Seminary has designed an Emergency Contact System (ECS) for the rapid distribution of urgent messages. The ECS is an electronic system designed to contact simultaneously by email and by text message all students and staff whose contact information is in the system. Notifications issued by this system will be sent to each staff and student email address on file with human resources. The system will also send a text message to all students and staff who have opted to participate in the electronic text message portion of the system. Students and staff may sign up for text messaging on the Staff and Student Portals and may contact Information Technology Services (392-4111, option 4) for assistance. Emergency Contact System emails to staff members will be sent to their Seminary provided email address. Students may check their email address on file by accessing the “Address” link under “Student Data Forms” on the Student Portal. Changes may take up to 48 hours to update in the system. Any warning sent through the ECS will be sent to all people registered in the system.

Other systems available to Public Safety staff for communicating emergency messages are networked campus telephones and walkie-talkies assigned to select staff. Networked VoIP telephones are on the desks of nearly all staff members and in several public spaces in campus buildings. Public Safety staff calling from one of these phones can activate all networked phones simultaneously to broadcast the caller’s voice. Walkie-talkies have been assigned to
select staff members who receive training to assist in campus emergency response, and the
PSO has continuous access to walkie-talkies that operate on the same frequency.

The PSO will determine in each case which system or systems described above would be
appropriate to communicate emergency notifications to the campus community. Public Safety
staff, assisted by departmental walkie-talkies, cell phones, and motor vehicles, may also
communicate emergency messages to the campus by word of mouth when necessary.

During an ongoing emergency situation, some or all of the systems described above will also be
used to communicate updates to the campus community as deemed appropriate by the PSO.
The PSO will send updates whenever the developing situation calls for a change in the campus
community’s activity.

Listed below are the persons responsible for assessing emergencies and sending emergency
notifications:
Senior Director of Operations (Public Safety), David Brown
Manager of Facilities and Campus Safety (Public Safety), Peter Render
Director of Information Technology, Richard Hiers

Emergency Response and Evacuation Procedure Testing
Covenant Seminary has undertaken to conduct annual tests of its emergency response and
evacuation procedures. This will be done through annual evacuation drills, table top exercises,
and/or systems and equipment tests. Covenant Seminary will publicize its emergency response
and evacuation procedures annually in conjunction with one of these tests. After each test, the
department conducting the test will document and file a description of the exercise, including the
date and time and whether it was announced or unannounced.

Timely Warnings
Any crimes reported to the PSO and considered by the Seminary to represent a serious or
continuing threat to students and employees will be reported to the campus community in a
timely manner. (Crimes that present immediate danger to the campus community will be
handled according the “Immediate Emergency Notification” procedures outlined above rather
than the “Timely Warning” procedures.) Timely reports will contain information to help members
of the community avoid becoming victims of the threat. The appropriate means of
communicating these reports will be determined on a case by case basis and may include some
or all systems described under “Immediate Emergency Notifications,” as well as student and
faculty/staff Portals, the campus newsletter, Community News, and chapel announcements.
**Missing Campus Residents**

Each campus resident may contact the Public Safety Supervisor, listed below, to designate one or more “missing person contact” to be notified should the campus resident be missing. This information will be retained in the campus PSO. To respect confidentiality, the PSO will only disclose this information in conjunction with a missing person investigation and only to law enforcement officials or to authorized, Seminary officials within the PSO and on the President’s Cabinet. Questions about missing person emergency contacts may be directed to the Manager of Facilities and Campus Safety.

Covenant Theological Seminary is dedicated to notifying local law enforcement and others as appropriate to aid in the location of campus residents who are missing. If anyone suspects that a campus resident is missing, he or she should contact one or more of the following persons:

- Safety and Security Dispatcher (314) 581-7212
- Manager of Campus Safety, Peter Render (314) 392-4166 or (314) 713-9964
- Senior Director of Operations, David Brown (314) 392-4165 or (314) 581-8258
- Dean of Students, Mike Higgins (314) 392-4154 or (314) 303-7014
- Resident Manager, Eileen May (706) 288-7966

Upon receiving a report of a missing campus resident, one of the above authorized staff members will inform the person reporting of the following:

1. The Seminary takes missing person reports seriously and will employ any reasonable means available to assist in locating a missing resident.
2. The PSO will immediately notify the appropriate law enforcement agency of the missing person report.

The authorized staff member will, then, without delay relay the report to the PSO who will in turn abide by the following procedures:

1. The PSO will immediately notify local police. If local police authorities determine that the resident is, in fact, person contact(s) previously designated by the resident.
2. If local police authorities determine that a resident who is under 18 years of age and is not emancipated is missing, the PSO will within 24 hours notify the resident’s custodial parent or guardian in addition to local police and the missing person contact(s) previously provided by the resident.
3. Covenant Seminary will cooperate fully with public law enforcement agencies in any ensuing investigation.
Covenant Theological Seminary Sexual Offense Policy

Covenant Seminary affirms that all individuals, male and female, are created in the image of God, and therefore deserve to be treated with respect, honor and love. Jesus Christ provides the supreme model for Christian relationships, treating others with love and purity.

The Seminary will make online training regarding sexual offense prevention and reporting procedures available to all students and staff. This training will be available at any time through our Student & Staff Portals with a bi-annual email notification of its availability. The Seminary will also provide multiple seminars/events per academic year related to the prevention of dating violence, domestic violence, rape, sexual assault, sexual harassment and/or stalking. These seminars/events will be available to all students and staff of the Seminary as well & will be publicized through Community News, the weekly student & staff email newsletter, and through directed emails as appropriate.

Allegations of sexual offenses will be investigated immediately and thoroughly. The Seminary will maintain confidentiality to the degree permissible by law and up to the point at which information needs to be disclosed to effectively investigate and/or act in the interest of protecting the safety of the Seminary community. If it is determined based on a preponderance of evidence that a sexual offense has occurred, prompt and appropriate disciplinary action will be taken, up to and including termination (of an employee) and/or expulsion (of a student). The Seminary will not retaliate or permit retaliation for bringing in good faith (i.e., not frivolously, maliciously, or with vengeful intent) an allegation of a sexual offense.
Sub-Section 1: Definitions
The following are definitions and terms related to sexual offenses:

Consent is defined as assent that is explicitly and freely given with reasonable and unimpaired judgment. Consent is required to be given by each individual. Assent does not constitute consent if it is given by an individual who by reason of youth, mental disease or defect, intoxication, a drug-induced state, or any other reason (e.g. incapacitation or unconsciousness) is manifestly unable or is known by the other individual(s) to be unable to make a reasonable and unimpaired judgment, or if assent is induced by force, duress, or deception. Past consent, silence, or the absence of resistance do not imply consent.

Sexual offenses include:

1. Dating Violence
2. Domestic Violence
3. Rape
4. Sexual Assault
5. Sexual Harassment
6. Stalking

These offenses will be treated by the Seminary as any other misconduct.

Dating Violence is violence committed against an individual by an individual with whom they have been in a social relationship of a romantic or intimate nature.

Domestic Violence is violence committed against an individual by that individual’s current or former spouse, current or former cohabitant, or an individual similarly situated under domestic or family violence law.

Rape occurs when an individual engages in non-consensual sexual intercourse. Two specific sub-categories of rape are:

- Acquaintance Rape is rape where the individuals know one another.
- Statutory Rape in Missouri is defined as having intercourse with an underage person. Statutory rape in the first degree is having sexual intercourse with a person under the age of 14. Statutory rape in the second degree is sexual intercourse between someone 21 years of age or older with an individual under the age of 17 (i.e. 14, 15 or 16).
Sexual assault is defined as harmful or threatening behavior of a sexual nature manifested in the form of physical contact and/or non-physical behavior (verbal threats, intimidations, and/or indecent exposure).

Sexual harassment includes any form of unwelcome or nonconsensual sexual advance, request for sexual favors, or other verbal or physical contact of a sexual nature, when: (1) submission to such conduct is made explicitly or implicitly a condition of employment or academic standing; (2) submission to or rejection of such conduct is used as a basis for evaluation or advancement; or (3) such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile, or offensive working or learning environment. Sexual harassment can occur regardless of the original intent and/or whether or not it is direct or indirect. It may include, but is not limited to:

1. Jokes, comments, verbal “kidding,” or abuse that is sexually oriented.
2. Suggestive, inappropriate, or graphic comments about an individual’s body, appearance, or actions.
3. Sexually suggestive gestures or actions, including physical actions such as patting, pinching, constant brushing against another’s body, or blocking another’s movement.
4. Subtle pressure for sexual activity or demands for sexual favors, whether or not accompanied by promise of reward or threat of punishment.
5. Sexual assault and/or rape.
6. Condoning any of the above.

Stalking is engaging in a course of conduct directed at a specific individual that would cause a reasonable individual to fear for their safety or the safety or others; or suffer substantial emotional distress.

Missouri Revised Statutes 566.010 – 566.155.2 contain specific information regarding Missouri state laws & penalties pertaining to sexual offenses.

Sub-Section 2: Prevention

The Seminary will make online training regarding sexual offense prevention and reporting procedures available to all students and staff. This training will be available at any time through our Student & Staff Portals with a bi-annual email notification of its availability. The Seminary
will also provide multiple seminars/events per academic year related to the prevention of dating violence, domestic violence, rape, sexual assault, sexual harassment and/or stalking. These seminars/events will be available to all students and staff of the Seminary as well & will be publicized through Community News, the weekly student & staff email newsletter, and through directed emails as appropriate.

To avoid being the instigator of inappropriate behavior individuals should:
- Know that they are expressing hostility & aggression if they try to force or coerce any other individual to engage in sexual acts or intercourse.
- Accept the other individual’s decision not to have sexual contact.
- Do not assume that because an individual seems flirtatious that they want to have a sexual relationship.
- Do not assume that paying for a date means that the other person owes sexual favors.
- Avoid the use of alcohol and illegal use of drugs. (See Alcohol & Drug policies in the faculty/staff/student handbook(s).)

To help deter sexual assault and rape, individuals should:
- Walk in lighted, familiar areas.
- Walk with a companion.
- Be direct & firm with someone who is pressuring for sexual activity.
- Avoid the use of alcohol or illegal drugs. (See Alcohol & Drug Policies in faculty/staff/student handbook(s).)
- Follow these guidelines when on dates:
  o Clearly establish the expectation in advance of where the date will take place & what will occur. Set boundaries.
  o Let someone else know where the date will take place, when it will end, and who will be there no matter the length of the relationship.
  o When feeling uncomfortable, pay attention to that feeling and begin to plan a way to get to a safe place.

Sub-Section 3: Bystander Intervention

*What can someone do to help if they witness a sexual offense occurring on-campus or elsewhere?*

NOTE: This information is not meant to cover all possible scenarios or variables nor is it meant to train someone as a counselor.

If an individual witnesses a situation on-campus, they should carefully assess the entire situation/circumstances before making any decisions or taking any action. Personal safety is the
first priority. It is important to report witnessing apparent sexual offenses (See Sub-Section 5 for details.) Do not assume someone else will do it.

Consider both DIRECT and INDIRECT ways to intervene. DIRECT means taking responsibility as the primary helper or speak to the person directly. INDIRECT means requesting that someone else take the responsibility as the primary helper (e.g., the Police, EMT personnel, etc.) or speaking to another person who could be helpful or give guidance and direction (e.g., Police, Dean of Students, Campus Safety, etc.).

EMERGENCY HELPING – General Strategies
Remember the following in an emergency or crisis:
- Be a calming presence, calming others as necessary if possible
- Gather information
- Look at options
- Provide support
- Do not become enmeshed

1. Look for the best exit strategies for those involved.
2. Be clear and direct with all requests.
3. Make safe choices; consider the level of risk in choosing an action for intervening.
4. Understand boundaries and limits – don’t be a hero. Remember verbal fights can quickly turn into physical fights. It is often better to WALK AWAY.
5. Intervene early – before a problem becomes a crisis or disaster.
6. Be sure to not escalate situation.
7. Publically state your commitment to helping – “I will do X.”
8. Engage other bystanders – “You do Y.”
9. Discuss consequences that the person cares about – encourage value based decisions.
10. Call 9-1-1 if it is not safe or prudent for you to help directly.

NON-EMERGENCY HELPING – General Strategies
With a non-emergency situation, even if not acted on immediately, don’t ignore the situation.
1. Consider the frequency, duration and intensity/severity when evaluating a situation.
2. Determine the barriers for individuals if possible – motivation, ability or environment.
3. Know your limits as a helper – engage others as necessary.
4. Be sensitive, understanding, and non-judgmental.
5. Challenge misperceptions – express true feelings/beliefs.
6. Identify the red flags; anticipate problems.
7. Determine the priority goal; formulate a plan; prepare/practice what to say.
8. Interrupt/distract/delay a situation that might be problematic – before it becomes an emergency.
9. Set boundaries – do not make excuses for the person or otherwise enable them.
11. Remember the Law of Delivery – who (person(s)), what (content), when (timing), where (location/privacy), why (reasons), and how (tone).

Sub-Section 4: Immediate Steps for Victims of a Sexual Offense

Following are steps that should be taken by victims of a sexual offense:

1. Get to a safe place as soon as possible.
2. Try to preserve all physical evidence. If possible, do not wash, take a shower, use the toilet, apply medications or change clothing. If changing clothing is necessary, put all clothing worn at the time of the incident in a paper rather than plastic bag.
3. Contact someone who can be trusted to be with & support you through the decision making, medical treatment, and interviews. This is your right!
4. Get medical attention as soon as possible to assure your physical well-being and to collect important evidence in the event legal action is taken at a later time. It is important to seek immediate & follow-up medical attention for several reasons: (1) to assess & treat any physical injuries that may have been sustained; (2) to determine the risk of sexually transmitted diseases or pregnancy.
5. Contact the Student Life department to receive psychological & spiritual support. The long term negative effects of such an incident may be minimized with the help of a trained professional counselor. Confidentiality will be maintained to the extent possible. They can also direct the victim to other resources that are available within the St. Louis community. (See Sub-Section 9 for a short list of immediately available resources.)
6. When calm, prepare written notes of the incident.

Sub-Section 5: Report a Sexual Offense

We strongly encourage any individual who has been the victim of a sexual offense, or who believes they have witnessed a sexual offense, to report it promptly. Failure to report promptly will hinder the Seminary’s ability to effectively investigate and/or act in the interest of protecting the safety of the Seminary community. You are encouraged to provide as much information as possible so that a fair and effective investigation may follow.
Reporting an incident is a separate step from filing a grievance with the Seminary or a criminal complaint with law enforcement. When a report is made, there is no obligation to continue with filing a grievance with the Seminary or a criminal complaint with law enforcement. Assistance in notifying the local police will be provided, if requested.

Individuals making a report may request that their identity be kept confidential until/unless a commitment is expressed to proceed with filing a criminal complaint.

Any incident should be reported to one or more of the following:

Public Safety Office
24-Hour Contact
314.581.7212

Suzanne Bates
Associate Dean of Students
314.392.4242
Suzanne.Bates@covenantseminary.edu

Alice Evans
Title IX Coordinator
314.392.4053
Alice.Evans@covenantseminary.edu

Peter Render
Manager of Campus Safety
314.392.4166
Peter.Render@covenantseminary.edu

Mike Higgins
Dean of Students
314.392.4155
Mike.Higgins@covenantseminary.edu

The report process is as follows:

- A statement will be taken to document what happened. Questions will be asked about the individuals involved, the scene of the incident, witnesses, and what happened before and after the incident. A support person may be present, and individuals considering filing a criminal complaint may ask a local police officer to participate as well.

- The Public Safety office must keep a log of reported incidents on-campus. The log will not contain names of individuals involved or personally identifiable information of those
individuals.

- All reports will be investigated by the Seminary to the extent possible. Involvement of the reported victim(s) of the sexual offense will be at their discretion. Based on a preponderance of evidence, the Seminary will take action to ensure the safety of the Seminary community.

- Adjudication through the Seminary Grievance & Disciplinary Procedures, the criminal justice system, or both is at the discretion of the individual who feels they have been the victim of a sexual offense. If they decide to move forward with filing a grievance with the Seminary, the procedures as outlined in Sub-Section 7 of this policy will be followed.

Sub-Section 6: Notice of Interim Measures Following the Report of a Sexual Offense

Any reported victim of a sexual offense is entitled to receive from the Seminary interim support and reasonable protection as needed against further acts of misconduct, harassment, or retaliation. A reported victim of a sexual offense is entitled to interim support and protection even if they were not the reporter. The Seminary will provide these interim measures regardless of whether the individual chooses to file a grievance with the Seminary or a criminal complaint with local law enforcement.

1. Individuals seeking interim support and protection should speak with one of the following individuals:

   Alice Evans
   Title IX Coordinator
   314.392.4053
   Alice.Evans@covenantseminary.edu

   Suzanne Bates
   Associate Dean of Students
   314.392.4242
   Suzanne.Bates@covenantseminary.edu

   Peter Render
   Manager of Public Safety
   314.392.4166
   Peter.Render@covenantseminary.edu

   Mike Higgins
   Dean of Students
   314.392.4155
   Mike.Higgins@covenantseminary.edu
2. Individuals who have been the victim of a sexual offense have the right to file a criminal complaint with local law enforcement regardless of whether they file a grievance with the Seminary.

The following are possible interim measures that may be utilized by the Seminary:

- **Increased Public Safety Presence** – Increased monitoring, supervision, or security where the incident occurred.

- **Modified Academic/Work/Residence Arrangements** – Change in the relevant arrangements for the accuser or accused to reduce the probability of contact between them. May include an allowance to withdraw from and retake classes without penalty.

- **No-Contact Order** – An order issued by the Seminary Public Safety Office to the accuser and/or accused banning all interaction and communication between them.

- **Temporary Suspension for the Accused** – A temporary suspension of access to apartment buildings/houses, campus, and activities (including classes and work) for the accused if it is believed by the Public Safety Office that the accused pose(s) a threat to the safety of the Seminary community.

### Sub-Section 7: Seminary Grievance & Disciplinary Procedures

A formal complaint should be brought in writing to the Title IX Coordinator. Alternatively, as primary points of contact in their respective areas, a formal complaint may be left in the care of:

1. the Dean of Students if the accuser is a student,
2. the Vice President of Business & Finance if the accuser is an employee,
3. the Dean of Faculty if the accuser is a full-time faculty member,
4. the Associate Dean of Academics if the accuser is an adjunct professor or visiting instructor.

The following process will run whether or not a criminal complaint is filed with local law enforcement.

The Seminary representative receiving the complaint will be responsible to:

1. Assure the accuser(s) that the matter will be taken seriously and treated as confidentially as possible, and that there will be no retaliation in response to allegations brought in good faith.
2. Review the written statement detailing the alleged offense(s) and encourage
the accuser to include any additional details (e.g. evidence, potential witnesses, etc.) not already included in the written complaint.

3. Encourage the accuser(s) to notify the police if the offense appears to be of a criminal nature.

4. Offer to make available appropriate counseling and pastoral care.

5. Arrange to minimize unnecessary contact between the parties until the situation is resolved and underscore the importance of working within these limits so that in no case should conversations about the matter occur without the presence of a responsible third party.

6. Review the situation, including interviewing all parties involved and any other parties who may have knowledge of the incident(s), to determine the facts within 30 days of the formal complaint being filed. Both the accuser & the accused have the right to be accompanied by a support person to all meetings and hearings.

7. Develop an appropriate action/disciplinary plan based on the preponderance of evidence within 45 days of the complaint being filed. Appropriate disciplinary measures will be commensurate with the seriousness of the particular offense and may be up to, or including, termination of employment and/or expulsion from academic programs at the Seminary.

8. Notify all parties in writing simultaneously, within 45 days of the complaint being filed, of the outcome of the Seminary’s investigation, including any disciplinary action(s) taken against the accused and of the right to appeal.

9. If the action plan satisfactorily resolves the issue, submit to the Office of the President a sealed summary of the matter.

Retaliation in any form against an individual who exercises their right to make a complaint, or against an individual who provides information related to any such complaint, is strictly prohibited and will in itself constitute cause for appropriate disciplinary action, up to, and including, termination of employment and/or expulsion from academic programs at the Seminary.

In the event that the grievance is not resolved by the fulfillment of the action/disciplinary plan, or the parties are not satisfied with the plan or its progress, an appeal may be brought in writing to the Office of the President within 60 days of the written notification of the original outcome. Within 45 days of the appeal, all parties will be notified of the final review and decision by the Office of the President.
If in the course of an investigation the local church of the accused is not already involved, because of the relationship of the Seminary to the Church, the Seminary will seek the written permission of the accused to include their church leadership in the process.

**Sub-Section 8: Possible Sanctions of Disciplinary Proceedings**

The following are sanctions that may be imposed based on the preponderance of evidence following Seminary Grievance & Disciplinary Procedures:

**Official Reprimand:** An official written reprimand kept in the Seminary’s student and/or employment files (as appropriate) with suggested corrective measures the individual(s) should take to avoid a future infraction. The reprimand will also include potential actions, up to and including Disciplinary Dismissal, if another incident should occur.

**Official Reprimand with Corrective Measures Requirement:** An official written reprimand kept in the Seminary’s student and/or employment files (as appropriate) with required corrective measures the individual(s) will have to take to avoid a future infraction and continue without suspension or dismissal. The reprimand will also include potential actions, up to and including Disciplinary Dismissal, if another incident should occur or if the corrective measures are not satisfactorily fulfilled.

**Disciplinary Suspension:** Suspension from further study and/or work for serious and/or repeated violations. Suspension for disciplinary reasons may also include being prohibited from visiting campus and/or attending Seminary functions. A written record of the suspension will be kept in the Seminary’s student and/or employment files (as appropriate) and will include a timeline and/or conditions for returning from suspension.

**Disciplinary Dismissal:** Dismissal from Seminary employment and study, including being prohibited from visiting campus and/or attending Seminary functions. A written record of the Disciplinary Dismissal will be kept in the Seminary’s student and/or employment files (as appropriate) and will include any conditions for reapplication; however, Disciplinary Dismissal will typically be permanent and prohibit any future employment or study. Disciplinary Dismissal is noted on student transcripts.
Sub-Section 9: Resources

On Campus
Public Safety Office  314.581.7212

Off Campus
ALIVE  314.993.2777
Anti-Violence Advocacy Project  314.503.2050
Mercy Emergency Room  314.251.6090
Crime Victims Advocacy Center  314.652.3623
Life Crisis Services (24-hour hotline)  314.647.4357
Safe Connections  314.531.2003
Sexual Assault Hotline  1.877.946.6854
Victim Service Council, STL County  314.889.3075
YWCA St. Louis Regional  314.531.7273
    Sexual Assault Center (hotline)

National Hotlines
AIDS Hotline  1.800.342.2437
Network of Victim Assistance  1.800.675.6900
A Woman’s Place  1.800.220.8116
**Sex Offender Registration**

Under the Campus Sex Crimes Prevention Act, persons required to register under a state offender registration program must notify the state concerning each post-secondary school at which the offender works or is a student. In Missouri, sex offenders must register with the police department in the city or county in which they live or work. To view or purchase a registry list, contact one of the following:

St. Louis City Police  
1200 Clark Ave., Room 114  
St. Louis, MO  63103  
(314) 444-5555

St. Louis County Police  
7900 Forsyth, Record Room  
Clayton, MO  63105  
(314) 889-2341

The state of Missouri provides a registered sex offender internet site by counties located at:  
http://www.mshp.dps.missouri.gov/MSHPWeb/PatrolDivisions/CRID/SOR/SORPage.html

Additional Information is available through the national registrant web site at:  

To inquire about sex registrants, contact the following:  
St. Louis County Sheriff’s Office at (314) 615-4724  
St. Charles County Sheriff’s Office at (636) 949-0809
**Alcohol and Drug Use Policy**

The Seminary prohibits the unlawful possession, use, or distribution of drugs by students and employees. The Seminary through its campus PSO will involve local law enforcement officials for suspected illegal drug violations on the school’s property or as part of the school’s activities. Any student charged with possession, use or distribution of illegal drugs will be immediately placed on disciplinary probation pending legal outcome of the charge. If a student is found guilty, it will be recommended that the student be suspended for a time period to be determined according to the seriousness of the offense. Readmission after such an offense will involve evidence of genuine repentance with a disciplinary, probationary status for at least one semester. Other consequences such as non-recommendation for placement and non-awarding of degrees could also result.

The Seminary believes that, in view of the widespread abuse of alcohol in our culture, the corporate life of the Seminary community is not enhanced by the public use of alcoholic beverages. Hence, consumption of alcoholic beverages in public places on campus is not permitted. This policy is in keeping with the advice of the 1980 and 1983 General Assemblies of the Presbyterian Church in America, stating that although requiring total abstinence “would go beyond the requirements of scripture,” the requirements of “love and wisdom … may lead to individual decisions to curb or refrain from the use” of alcohol. A student found guilty of violating the explicit prohibitions of this paragraph will be subject to a $200 fine and may be placed on disciplinary probation for one semester. A second offense could result in a one-semester suspension with mandatory counseling before readmission is considered.

Students convicted of drug use or possession may lose eligibility for student loans. See the Financial Aid Director for details.

Further information regarding prevention and consequences of drug and alcohol abuse may be found through the following sources:

- Higher Education Center for Alcohol and Drug Prevention
  - Website: [http://www.higheredcenter.org](http://www.higheredcenter.org)  
  - Phone: 800-676-1730
- DEA’s Controlled Substance Act:
- DEA’s publication *Drugs of Abuse*:
- National Institute on Drug Abuse’s chart of “Commonly Abused Drugs”:

**Counseling Assistance**

Students seeking counseling services and referrals should contact Mark McElmurry, Director of Student Life, at (314) 392-4153 or Suzanne Bates, Associate Dean of Students, at (314) 392-4157. Alcohol and drug abuse programs are available through Mercy Hospital St. Louis as out-patient only at (314) 251-6565.

For off-campus assistance, the following organizations provide local referrals and information on alcohol or drug abuse through nation-wide hot-line services:
Legal Sanctions

Because of the harmful effects of alcohol and drug abuse, local, state, and federal governments have enacted laws making it a criminal offense to unlawfully possess, use or distribute illicit drugs or alcohol. These laws cover the "one time," "social," or "recreational" users, as well as the alcoholic and drug addict. Covenant Seminary will refer any student or employee found to be in violation of these laws, including laws regarding underage drinking, to local authorities and will also consider appropriate disciplinary action. In order to assist you in understanding the potential legal implications of such conduct, a summary of the criminal sanctions that may be imposed under local, state, and federal laws is provided below.

Alcohol:
Missouri Law: Any person under the age of 21 who purchases or attempts to purchase or has in his or her possession any intoxicating liquor is guilty of a misdemeanor and may, upon conviction, be punished by a fine between $50 and $1,000 or by imprisonment for up to 1 year, or both. Persons who knowingly furnish alcohol to minors are also guilty of a misdemeanor and subject to the same sanctions.

Illicit Drugs:
The severity of sanctions imposed for both possession and distribution offenses depends on the quantity of drugs, prior convictions, and whether death or serious injury resulted. Sanctions may be increased for offenses that involve distribution to minors or occur on or near Seminary premises. In addition, other federal laws require or permit forfeiture of personal or real property used to illegally possess, facilitate possession, transport or conceal a controlled substance. A person's right to purchase or receive a firearm or federal benefits, such as student loans, grants, contracts, or professional or commercial licenses may also be revoked or denied as a result of a drug conviction.

Missouri Law: The penalty for persons convicted of possession of illicit drugs in Missouri includes a prison sentence up to 7 years and a maximum fine of $15,000, unless an offense involves smaller quantities (35 GMS. or less), which is punishable from 1 to 3 years in prison and a fine of $5,000. See also http://www.moga.mo.gov/STATUTES/C195.HTM.

Federal law: A chart of federal penalties for possession of illicit drugs is included in Appendix 1 and is also available at the following website address: http://www.usdoj.gov/dea/agency/penalties.htm.
Any questions concerning this report and these security and safety guidelines may be directed to Peter Render, Manager of Campus Safety, (314) 392-4166 or David Brown, Senior Director of Operations, at (314) 392-4165.
### Federal Trafficking Penalties

**Federal Trafficking Penalties for Schedules I, II, III, IV, and V (except Marijuana, Hashish, Hashish Oil)**

<table>
<thead>
<tr>
<th>Schedule</th>
<th>Substance/Quantity</th>
<th>Penalty</th>
<th>Substance/Quantity</th>
<th>Penalty</th>
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<tbody>
<tr>
<td>II</td>
<td>Cocaine 500-4999 grams mixture</td>
<td><strong>First Offense:</strong> Not less than 5 yrs. and not more than 40 yrs. If death or serious bodily injury, not less than 20 yrs. or more than life. Fine of not more than $5 million if an individual, $25 million if not an individual.</td>
<td>Cocaine 5 kilograms or more mixture</td>
<td><strong>First Offense:</strong> Not less than 10 yrs. and not more than life. If death or serious bodily injury, not less than 20 yrs. or more than life. Fine of not more than $10 million if an individual, $50 million if not an individual.</td>
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<tr>
<td>II</td>
<td>Cocaine base 28-279 grams mixture</td>
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<td>Cocaine Base 280 grams or more mixture</td>
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<td>IV</td>
<td>Fentanyl 40-399 grams mixture</td>
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<td>Fentanyl 400 grams or more mixture</td>
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<tr>
<td>I</td>
<td>Fentanyl Analogue 10-99 grams mixture</td>
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<td>Fentanyl Analogue 100 grams or more mixture</td>
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<tr>
<td>I</td>
<td>Heroin 100-999 grams mixture</td>
<td><strong>Second Offense:</strong> Not less than 10 yrs. and not more than life. If death or serious bodily injury, life imprisonment. Fine of not more than $8 million if an individual, $50 million if not an individual.</td>
<td>Heroin 1 kilogram or more mixture</td>
<td><strong>Second Offense:</strong> Not less than 20 yrs. and not more than life. If death or serious bodily injury, life imprisonment. Fine of not more than $20 million if an individual, $75 million if not an individual.</td>
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<tr>
<td>I</td>
<td>LSD 1-9 grams mixture</td>
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<td>LSD 10 grams or more mixture</td>
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<tr>
<td>II</td>
<td>Methamphetamine 5-49 grams pure or 50-499 grams mixture</td>
<td><strong>Second Offense:</strong> Not less than 10 yrs. and not more than life. If death or serious bodily injury, life imprisonment. Fine of not more than $8 million if an individual, $50 million if not an individual.</td>
<td>Methamphetamine 50 grams or more pure or 500 grams or more mixture</td>
<td><strong>2 or More Prior Offenses:</strong> Life imprisonment. Fine of not more than $20 million if an individual, $75 million if not an individual.</td>
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<tr>
<td>I</td>
<td>PCP 10-99 grams pure or 100-999 grams mixture</td>
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<td>PCP 100 grams or more pure or 1 kilogram or more mixture</td>
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<tr>
<td>Substance/Quantity</td>
<td>Penalty</td>
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<tr>
<td>Any Amount Of Any Other Schedule I &amp; II Substances</td>
<td><strong>First Offense</strong>: Not more that 20 yrs. If death or serious bodily injury, not less than 20 yrs. or more than Life. Fine $1 million if an individual, $5 million if not an individual. <strong>Second Offense</strong>: Not more than 30 yrs. If death or serious bodily injury, life imprisonment. Fine $2 million if an individual, $10 million if not an individual.</td>
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<tr>
<td>Any Drug Product Containing Gamma Hydroxybutyric Acid</td>
<td><strong>First Offense</strong>: Not more than 10 years. If death or serious bodily injury, not more that 15 yrs. Fine not more than $500,000 if an individual, $2.5 million if not an individual. <strong>Second Offense</strong>: Not more than 20 yrs. If death or serious bodily injury, not more than 30 yrs. Fine not more than $1 million if an individual, $5 million if not an individual.</td>
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<tr>
<td>Flunitrazepam (Schedule IV) 1 Gram Or More</td>
<td><strong>First Offense</strong>: Not more than 5 years. Fine not more than $250,000 if an individual, $1 million if not an individual. <strong>Second Offense</strong>: Not more than 10 years. Fine not more than $500,000 if an individual, $2 million if other than an individual.</td>
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<tr>
<td>Any Amount Of Other Schedule III Drugs</td>
<td><strong>First Offense</strong>: Not more than 1 yr. Fine not more than $100,000 if an individual, $250,000 if not an individual. <strong>Second Offense</strong>: Not more than 4 yrs. Fine not more than $200,000 if an individual, $500,000 if not an individual.</td>
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<tr>
<td>Substance</td>
<td>First Offense</td>
<td>Second Offense</td>
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<tr>
<td>Marijuana 1,000 kg or more</td>
<td>Not less than 10 yrs. or more than life. If death or serious bodily injury, not less than 20 yrs., or more than life. Fine not more than $10 million if an individual, $50 million if other than an individual.</td>
<td>Not less than 20 yrs. or more than life. If death or serious bodily injury, life imprisonment. Fine not more than $20 million if an individual, $75 million if other than an individual.</td>
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<tr>
<td>Marijuana 100 to 999 kg</td>
<td>Not less than 5 yrs. or more than 40 yrs. If death or serious bodily injury, not less than 20 yrs. or more than life. Fine not more than $5 million if an individual, $25 million if other than an individual.</td>
<td>Not less than 10 yrs. or more than life. If death or serious bodily injury, life imprisonment. Fine not more than $8 million if an individual, $50 million if other than an individual.</td>
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<tr>
<td>Marijuana 50 to 99 kg</td>
<td>Not more than 20 yrs. If death or serious bodily injury, not less than 20 yrs. or more than life. Fine $1 million if an individual, $5 million if other than an individual.</td>
<td>Not more than 30 yrs. If death or serious bodily injury, life imprisonment. Fine $2 million if an individual, $10 million if other than an individual.</td>
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<tr>
<td>Hashish More than 10 kg</td>
<td>First Offense: Not more than 5 yrs. Fine not more than $250,000, $1 million if other than an individual.</td>
<td>Second Offense: Not more than 10 yrs. Fine $500,000 if an individual, $2 million if other than an individual.</td>
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<tr>
<td>Hashish Oil More than 1 kg</td>
<td>First Offense: Not more than 5 yrs. Fine not more than $250,000, $1 million if other than an individual.</td>
<td>Second Offense: Not more than 10 yrs. Fine $500,000 if an individual, $2 million if other than an individual.</td>
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</tbody>
</table>

*The minimum sentence for a violation after two or more prior convictions for a felony drug offense have become final is a mandatory term of life imprisonment without release and a fine up to $8 million if an individual and $20 million if other than an individual.*
Effects of Alcohol

Alcohol consumption causes a number of marked changes in behavior. Even low doses significantly impair the judgment and coordination required to drive a car safely, increasing the likelihood that the driver will be involved in an accident. Low to moderate doses of alcohol also increase the incidence of a variety of aggressive acts, including spouse and child abuse. Moderate to high doses of alcohol cause marked impairments in higher mental functions, severely altering a person's ability to learn and remember information. Very high doses cause respiratory depression and death. If combined with other depressants of the central nervous system, much lower doses of alcohol will produce the effects just described.

Repeated use of alcohol can lead to dependence. Sudden cessation of alcohol intake is likely to produce withdrawal symptoms, including severe anxiety, tremors, hallucinations, and convulsions. Alcohol withdrawal can be life threatening. Long-term consumption of large quantities of alcohol, particularly when combined with poor nutrition, can also lead to permanent damage to vital organs such as the brain and the liver.

Mothers who drink alcohol during pregnancy may give birth to infants with fetal alcohol syndrome. These infants have irreversible physical abnormalities and mental retardation. In addition, research indicates that children of alcoholic parents are at greater risk than other youngsters of becoming alcoholics.