

SECURITY
SAFETY
SENSITIVITY

THE "3Ss" BOOKLET
(RULES OF CONDUCT)

THE SALVATION ARMY USA EASTERN TERRITORY
COLLEGE FOR OFFICER TRAINING
SUFFERN, NEW YORK
2018

SECURITY

The following are regulations and instructions which most directly and immediately require informing and involving Campus Security.

If the incident or situation is perceived as **an emergency**, the universal response of **9-911** should be used and followed up by notification to one of the phone numbers provided in this section as soon as possible. Remember that a "9" is required prior to dialing this emergency code, therefore 9-911 will be needed from all CFOT landlines. Please be aware that 911 is not permitted from a cell phone in the Suffern area therefore you may wish to program your personal **cell phone with the following number for the Suffern Police Department emergency response (845) 357-2300.**

Any individual witnessing a dangerous, criminal or malicious act or incident should undertake no intervention potentially harmful or injurious to themselves or others, but, instead notify **9-911 immediately**, then call Security.

Security (Cell): 845-826-5964
Landline: x21392
845-368-7392

VIDEO SECURITY

For security and safety reasons, there are cameras situated around campus in key traffic areas such as stairways, entrances and outside areas. This is for the purpose of the safety of the campus. The access to view these cameras is limited to only authorized personnel.

CRIMES ON CAMPUS

Articles 129A and B and the Clery Act are regulations that the College for Officer Training strictly follows and will strictly adhere to. The College must report, investigate, triage and adjudicate all reportable crimes on our campus. These reportable crimes include: Homicide, Manslaughter, Rape, Fondling, Incest, Statutory Rape, Robbery, Aggravated Assault, Burglary, Motor Vehicle Theft, and Arson. These crimes must be reported when any members of any constituency on campus (student, faculty or employee) are involved.

As stated by Clery Act (1990), amended by the Violence Against Women Act (2013) and Education Law, Article 129-B (effective October 5, 2015), sexual offenses are particularly grievous and require added explicit rules and definitions. The following definition of "affirmative consent" is explicitly required by law: "Affirmative consent is a knowing, voluntary and mutual decision among all participants to engage in any prohibited and potentially dangerous act (including explicitly sexual activity). Consent can be given by words or actions, as long as those words or actions create clear permission regarding willingness to engage in the activity. Silence or lack of resistance, in and of itself, does not demonstrate consent. The definition of consent does not vary based upon a participant's sex, sexual orientation, gender identity or gender expression."

INCIDENT REPORT POLICY

These are the steps involved in reporting incidents to Campus Security when an incident has happened. Incidents include:

- Criminal offense reported or observed whether by victim or bystander
 - Non-criminal but injurious incident where negligence is suspected
 - An accident such as auto, fall on walk way or stairs, severe cut or burn, etc., where emergency treatment is needed
 - Harassment of any individual in the campus community including sexual, racial, age or "lesser in power"
1. An incident is to be reported as soon as possible to Security on campus:
 - a. Any violent crime as seen by campus residents, employees, or staff
 - b. Any suspicious activity on campus perpetrated by residents, employees, staff or outside person
 - c. Any suspicious character lurking around any building on campus
 - d. Any accident on campus related to auto or personal, i.e. falls, severe cuts or burns that would require emergency services
 - e. Any harassment of campus residents whether by other campus residents, employees, staff or outside person
 2. Security will assist victim or bystander with calls made to 911 and/or police.
 3. If Security is present as incident is happening they are to help resolve incident and detain both parties until police and/or appointed administrator arrive.
 4. MAILING LIST - Security is to notify in order:
 - a. Assistant Training School Principal for Administration & Title IX Coordinator
 - b. Director of Business
 - c. Training College Principal and Director of Personnel
 5. Security will promote campus safety by being available to escort campus resident to their dorms when asked by said resident.
 6. Security will assist campus residents when locked out.
 7. Security will assist in the event of a lockdown. (Appendix A)
 8. Security will assist in the event of a fire in any building on campus as outlined in the Fire Evacuation Plan provided following.

APPENDIX A

CFOT Family Care Center Emergency Action Plan - Initiating the Lockdown

In the event of an emergency on The Salvation Army College for Officer Training campus; or in the event of a perceived threat which could endanger the children, families and staff in the Family Care Center. Follow lockdown procedure as instructed.

Inside Threat

An inside threat can be someone who gains access to or is already in the unit and who becomes verbally or physically threatening to a particular individual or other persons and endangers the welfare of the persons in the Family Care Center. In the event that there is an inside threat; whether in the Family Care hallway or at the classroom door, remain calm and evacuate your class outside through the outer door of your classroom.

Evacuation Procedures

In the event that either an outside or an inside threat upon family care requires you to evacuate your classroom, please adhere to the evacuation guidelines as instructed.

APPENDIX B

CFOT Campus Security

PROPERTY & PERSONAL INCIDENT REPORT

Property Name:	Salvation Army College for Officer Training
Property Location:	Suffern, NY
Person Completing Form:	
Today's Date:	
Date of Incident:	
Time of Incident:	

Important Note: In the event of an emergency or incident on the property. Complete this form and email it to the **MAILING LIST**: when the incident has been resolved to a stable level of safety.

Incident Information:

Incident Location:	
Description of Incident: (Include all pertinent information such as names, contact information, what happened, description of property involved if applicable, an estimate of damage, how you were made aware of the incident, if there were any injuries to persons and if so describe the injuries, and what action taken by responders, administrators or other if any) Please Be As Concise As Possible	Recall, all information in this report is to remain confidential and protected until adjudication/resolution achieved, however, campus is informed to the degree required to obtain and maintain safety in a format available to all.

Were the Authorities Contacted? (Yes or No):	
Was a Police Report Filed? (Include Report # if Possible):	
Weather at time of incident (Sunny, Cloudy, Rainy, Snowing, Etc.):	

Witness Information:

Were there any witnesses to the incident? (Yes or No):	
If Yes, Please Give the Name, Address and Phone Number for Each Witness:	

Other Information:

Who Reported Incident? (Include Name and Phone):	Date Reported:
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ACCIDENT OR INJURY INCIDENTS

Report immediately to the Health Center Director and appropriate **medical emergency** responders any incidents of serious injury or any observed accident, fall or other type of situation which may have resulted in injury to persons on the CFOT campus. **FOR LOCAL AMBULANCE SERVICE, CALL THE FIRE DEPARTMENT NUMBER (for the district) AT (845) 353-6190.**

First Aid kits are available in the main office, kitchen, Family Care Center kitchen, Field Training department, and in each of the vehicles. The items in the kits should not be utilized for on-going needs, but for emergency situations only. If you notice that a kit is low in supplies, please notify the Health Officer. Automated External Defibrillators (AEDs) are strategically placed around the campus. The thirteen units are located in the following areas:

- Front entrance main building (Talmadge)
- Next to Health Office in Watson (1st floor of Watson)
- Outside Cadet Dining room
- Student Center entrance
- Pepper Hall (Main entrance & third floor)
- Pepper Hall (Campus Ministry offices)
- Davidson Hall (Main entrance & second floor)
- Maintenance department
- Agnew Hall (outside fitness center on lower level)
- Agnew Hall (Main entrance)
- Portable unit with Health Officer

For aid throughout the day, one can contact the **Health Center** by calling extension **21260**, or in more urgent situations by directly calling the Health Center Director's cell phone: **845- 826-1853**.

FIRE SAFETY & DRILL/FIRE EVACUATION PROCEDURES

It is your responsibility to read and understand the fire evacuation plan. This plan is located on the CFOT Bulletin Board. Fires and suspicious smoke or fumes should be reported immediately to the Police Department (**845-357-2300**) and the central switchboard (**21200**) **from any landline on campus**.

Fire safety and evacuation procedures are prepared by the Fire Safety Officer (Assistant Director of Business) and distributed to all cadets. These procedures are updated annually. Cadets should review these and be familiar with the following:

- * Your Squad Monitor and alternate
- * The fire exit your squad is to use
- * The alternate exits that may be used in event of need in a real emergency
- * Your squad's meeting place outside
- * The members of your squad.

General Instructions

- a. When the building alarm sounds, all cadets, cadet children, staff and employees are to evacuate the building immediately without question.
- b. Once outside the building move to your squad's assigned meeting place. Do not linger in the roadways; fire equipment must have free access. Monitors or their alternates must quickly check attendance to ensure that everyone has evacuated the building. If anyone is missing,

report that name to the Police Officer or Fire Chief on the scene. Do not re-enter the building under any circumstance.

- c. The removal of batteries of smoke detectors is a criminal offense.

Evacuation during Class Hours

- a. Instructors will assume responsibility for their class evacuation. Use the exit nearest your classroom. There are fire escape windows in each classroom.
- b. Once outside, quickly proceed to the location your squad has been assigned.
- c. Children in the Family Care Center will remain under the supervision of family care workers. In inclement or cold weather, the Family Care van will be available for children to sit in while the drill is completed. Teens that are on their own when parents are in class should use the nearest exit and report to the Family Care location.

Evacuation from Quarters

- a. When the alarm sounds all cadets must evacuate the buildings.
- b. Monitors or their alternates must quickly check each room to insure that everyone has been evacuated. If the monitor is on a lower floor when the alarm sounds, do not go upstairs; leave the building.
- c. Pepper, Agnew and Davidson Hall exits are from East and West stairways and center stairs.
- d. All Rader Apartments should have fire escape ladders on the third floor of the apartment for emergency exit. Make sure they are easily accessible.

General Reminders

- a. When the building alarm sounds at any time, evacuate the building.
- b. Move quickly without running.
- c. No unnecessary talking.
- d. The first individual at any exit should hold the door open until everyone is out of the building.
- e. Always move to your squad's location.
- f. Be familiar with the location of the fire extinguisher on your floor. Fire hoses on each floor are to be used by fire department personnel only. Know where the alarm box is located.
- g. Keep doors closed at all times.
- h. Parents are responsible for children when not in Family Care.
- i. Residents in Pepper, Agnew, and Davidson Halls must not use the elevator for evacuation purposes.

No one should tamper or play with fire equipment. It is against the law to use this equipment for anything but fires.

SECURITY/SAFETY EQUIPMENT

The unauthorized alteration, misuse or tampering with any equipment or device intended for use in preserving or protecting the safety of members of the CFOT community including but not limited to: keys, security cameras, FOBs, exit signs, fire extinguishers, fire alarms, fire boxes, standpipes, first aid equipment, automated external defibrillators or emergency telephones is strictly prohibited.

SAFETY

CHILD AND ADOLESCENT SAFETY AND CURFEW

While the individual rights of families are respected, the behavior of one child impacts that of another and the endangerment of any child on campus impacts the community. It is important that families set boundaries for their children and adolescents and ensure that those limits are respected. It is also vital that all safety rules set by the CFOT are respected and upheld by parents, so their children and teens will also respect and uphold these rules.

Children under age 18 should be supervised outside.

As a reminder, the curfews for children are as follows:

Elementary School – 9:00 PM

Middle School/High School- 10:00 PM

ILLEGAL POSSESSION OF CONTROLLED SUBSTANCES OR WEAPONS

Cadets/students or cadet children are not to illegally use, sell, possess, or distribute any state or federally controlled drug, narcotic, barbiturate, hallucinogen, marijuana, amphetamine or cocaine stimulants, or alcohol. Possession of weapons including but not limited to guns, clubs and knives is not permitted on the College campus.

HAZING

The hazing of cadets or cadet children at the CFOT is strictly prohibited. Hazing is defined by any action taken or situation created to produce mental or physical discomfort, embarrassment, ridicule or endangerment of a cadet or group of cadets or their children.

THEFT, MISAPPROPRIATION, MISREPRESENTATION OR UNAUTHORIZED SALE OR USE OF CFOT PROPERTY

Cadets and cadet children are to refrain from unauthorized occupancy, use, possession or removal from a designated area, of property belonging to the CFOT, its community members, guests or vendors. Services provided to or by members or guests of the CFOT may not be used or obtained unless authorized in advance by the appropriate officer. This includes the misuse or unauthorized use of CFOT telephones, computer services, electronic communications or facilities. Also, cadets may not represent themselves as having the authority to enter into contracts or agreements that affect the CFOT in any way. Only Territorial Headquarters is authorized to sign contracts that bind the CFOT.

UNAUTHORIZED ENTRY OR EXIT FROM CFOT FACILITIES

Forcible or unauthorized entry to any building, structure, facility, room or container, file cabinet, desk drawers, etc. on the premises of CFOT owned or controlled property is prohibited. Improper use of designated exits is also prohibited. If you are having something delivered, **you must meet your delivery person at the door (under no circumstances are doors permitted to be blocked opened as they are a fire and code violation as well as a safety concern)**. Cadets and family members are not permitted to share their ID badges or FOBs with the outside community. This is for your protection and the protection of the property.

RESTRICTED AREAS

Cadets are not permitted to enter the following areas without permission:

- IT Department –office areas
- Boiler rooms
- Maintenance shop area – unless part of a class
- Front Office/Copy Room
- Mail box Room
- Other Cadet's housing
- General CFOT storage rooms
- Offices
- A/V and Sound Booth(s)
- Pond and surround

CIVIL OR CRIMINAL OFFENSES

Any cadet who violates any state, federal or municipal law shall be subject to disciplinary action for said offenses up to and including suspension and expulsion. The adjudication of such violations may proceed regardless and/or independently of any action taken by state, federal or municipal agencies.

DISORDERLY, VIOLENT OR DANGEROUS BEHAVIOR TO SELF OR OTHERS

Cadets/students and/or their children are not to engage in behavior that threatens, harms or causes to place in harm, themselves or other persons or to exhibit behavior that is illegal, destructive, indecent, obscene or disorderly. Types of conduct that this regulation is designed to cover, include but are not limited to the following examples:

1. Intentionally inflicting bodily harm upon any person or taking reckless action that results in harm to any person; taking any action that creates a substantial risk or harm to any person or threatening by any means of transmission; use of force to harm or injure any person.
2. Disrupting the peace; impeding classes; causing emotional harm and/or endangering the safety, health or life of any person on campus through actions or words.
3. Obstructing fire escape routes such as hallways or stairwells.
4. Committing acts of indecent or obscene nature.
5. Climbing or scaling the exterior of any CFOT building or facility.
6. Production of sound through amplification or other means including voices that unreasonably disturbs or disrupts the peace of others or violates CFOT standards.

SENSITIVITY

CADET CODE OF CONDUCT

A cadet, by voluntarily joining the College community, assumes responsibility for abiding by the standards that have been instituted by the College for Officer Training. Cadets are advised to read the Community Guidelines carefully to be aware of the policies which inform the College. The code of cadet responsibility was developed to give formal recognition to the rights and responsibilities of cadets at the College for Officer Training and is based on the following principles.

1. The intrinsic value of the person stands above other values. The personal rights and dignity of individuals are to be held inviolate, to take precedence over any academic goal set forth by the College.
2. A cadet is respected as a responsible person. They therefore are encouraged to make informed decisions with respect to their own education/spirituality and to be involved in College decisions to the fullest extent possible.
3. Just as the individual cadet has their own personal rights, so the College has an obligation to exercise its rights and privileges in conformity with the laws and procedures governing its actions.
4. The CFOT recognizes that freedom to teach and freedom to learn depend upon opportunities and conditions in the classroom, on the campus and in the larger community. The responsibility to secure and respect general conditions conducive to learning is shared by all members of the academic/spiritual community. Freedom is meaningless unless responsibility is also present.

As a result of the high caliber of men and women the CFOT attracts, the code of student responsibility reflects the emphasis on responsibility in spiritual, academic, and non-academic areas of College life. It is the intent of these guidelines to provide support for the educational and religious aims of this College without unduly restricting or diminishing the College community experience. This document outlines the minimum acceptable level of conduct, expected of every cadet at the CFOT. The policies and procedures outlined are those that cadets, faculty and administrators at the College have designed to further the education or religious aims of the College and to assist all cadets in the pursuit of their educational, spiritual, personal and social development.

REASONABLE DIRECTIVES FROM CFOT OFFICERS OR STAFF MEMBER

Cadets and/or children are not to disregard reasonable directives, either verbal or written, issued by a CFOT officer or staff member or obstruct an officer or staff member in carrying out his/her assigned duties or responsibilities.

SELLING AND SOLICITATION

Solicitation using CFOT buildings, equipment, services or grounds is prohibited without the expressed written sponsorship of an officer or cadet organization. No cadet or cadet child is permitted to use their residence for any commercial purpose. Any CFOT wide solicitation needs the authorization of the CFOT Executive Council. All cadet and CFOT sponsored charitable solicitations must be coordinated with and approved by the Personnel department.

HARASSMENT, DISCRIMINATION & ASSAULT IN THE CFOT COMMUNITY

The Salvationist tradition has in its history and mission a deep and abiding respect for the dignity of individuals and their cultures. The CFOT is committed to action that supports such diversity and enables all members of the CFOT community to build and enhance relationship in a safe environment. The CFOT is also committed to providing and maintaining a healthy living and working environment for all cadets, cadet children, staff and faculty members free of harassment, discrimination and/or assaulting behavior of any kind against any person or group of individuals based on race, gender, age, national origin, religion, marital status or disability. In accordance with Salvation Army values, its role as an educational institution and local, state and federal laws, the CFOT condemns any such form of harassment, discrimination and/or assaulting behavior in the CFOT community.

Any cadet or cadet child found to have engaged in such conduct is subject to CFOT disciplinary sanctions up to and including probation and/or termination. In addition, any cadet or cadet children who violate any state, federal or municipal law, shall be subject to disciplinary action for said offenses by appropriate authorities.

The CFOT will submit to disciplinary review, any cadet alleged to have engaged in any of the above behaviors. Any such action taken by the CFOT will proceed in accordance with the CFOT's disciplinary procedures listed in the herein.

SEXUAL HARASSMENT POLICY

The Salvation Army College for Officer Training is committed to providing and maintaining a healthy learning and working environment for all cadets, staff, faculty and other members of the CFOT community, free of discrimination in all forms of sexual and gender harassment, which diminishes the dignity or impedes the academic freedom of the community. In accordance with Salvation Army values and the CFOT's role as an educational institution and both federal and state law, the CFOT condemns any form of sexual or gender harassment or assault and is committed to taking action to prevent and eliminate all forms of them including coercive sexual behavior. These types of harassment also may constitute unethical conduct. Any cadet, staff member, faculty member found to have engaged in such conduct is subject to disciplinary action up to and including probation and/or termination. Further, the CFOT condemns any acts in violation of this policy involving any third parties including visitors, guests and agents, representatives and employees of suppliers or contractors and will take violations of this policy by such parties into consideration in awarding of contracts.

Sexual and gender harassment are not only repugnant to the CFOT community and a violation of this policy, but may be a criminal offense according to state and federal laws. Members of the CFOT community who have been found in violation of statutes related to sexual harassment and/or assault may be subject to additional CFOT disciplinary action.

NOTE: If a cadet wishes to file a complaint against another cadet, that cadet should contact the Director of Personnel. All other complaints should be filed with the Assistant Training Principal for

Administration or Assistant Training Principal for Spiritual Formation or someone operating in a supervisory capacity.

DEFINITION OF SEXUAL HARRASSMENT

1. Sexual harassment includes but is not limited to any unwelcomed sexual advances, direct or indirect, request for sexual favors and other verbal or physical conduct of a sexual nature when a submission to or rejection of such conduct is made or is threatened to be made, either explicitly or implicitly:
 - a. A term or condition of instruction, employment or participation in other CFOT activity.
 - b. Submission to or a rejection of such conduct by an individual is used or is threatened to be used as a basis for evaluation in making academic or employment decisions affecting that individual or
 - c. Such conduct has the intended purpose or can reasonably be expected to have the effect of interfering with an individual's academic or professional performance or advancement, or creating an intimidating, hostile or offensive educational living or working environment.
2. The CFOT's sexual harassment policy and procedures also apply to gender harassment. Gender harassment includes verbal or physical harassment that is based on the person's gender but that is not sexual in nature.
3. It is a violation of this policy for any administrative faculty or staff member of the CFOT to offer or request sexual favors, make sexual advances or engage in sexual conduct, consensual or otherwise. In such circumstances, consent may not be considered a defense against the charge of sexual harassment in any proceeding conducted under the CFOT's sexual harassment policy. The determination of what constitutes sexual harassment depends upon the specific facts and the context in which the conduct occurs.

SEXUAL HARASSMENT COMPLAINT PROCEDURE

1. Reporting and Resolution

All incidents of sexual or gender harassment should be reported by the complainant to the Director of Personnel. Complaints will be treated with discretion and will be promptly and thoroughly investigated. The Director of Personnel may ask the complainant to put the complaint in writing.

2. False Complaints

These are allegations made knowing that they are not true that can have a similar impact. Intentional false charges are grounds for discipline up to and including discharge and/or expulsion. Disciplinary proceedings shall follow applicable procedures that are set forth herein.

3. Confidentiality

The CFOT is committed to balancing the interest of all parties involved in sexual and gender harassment complaints and will attempt to keep the name of the complainant confidential and to respect the rights of the accused harasser (respondent). However, the CFOT recognizes that there are certain situations that may require disclosure of information. Further, when credible information received through investigation shows that there may be violations of other CFOT policies, then the appropriate individuals will be notified.

4. Investigation Process

The Director of Personnel shall be informed of all reported complaints of sexual or gender harassment. In cases where the person complaining of the harassment and the person complained

about are both cadets, the Director of Personnel will assume primary responsibility for overseeing the investigation process. In other cases of faculty or employee complaints, the Director of Personnel will work with the Assistant Training Principal for Administration in the investigation process. The CFOT recognizes that many issues relating to sexual or gender harassment are resolved through discussions with and advice from the Director of Personnel and the Assistant Training Principal for Administration. This resolution may include but is not limited to an apology by the respondent, a commitment by the respondent not to repeat the offending behavior and/or to take steps to achieve that goal by, for example, seeking counseling or acceptance that no further action is warranted.

5. Further Investigation

The Director of Personnel will conduct further investigations if the complaint is not resolved in the above manner. When a cadet is accused of sexual or gender harassment, the non-academic disciplinary procedure set forth in the code of cadet responsibility shall apply. The Director of Personnel will promptly inform the respondent of the identity of the person who will conduct the investigation and the respondent will be provided with ample opportunity to respond to the complaint. Every reasonable attempt will be made to resolve all harassment complaints in a timely fashion. The investigation will be conducted with discretion. Only individuals who may have substantial information directly relevant to the complaint will be interviewed as witnesses.

If the complaint is found to have no merit or if the facts cannot be established, the complainant and the respondent will be informed, no further action will be taken and nothing will be placed in the respondent's file. If after a full and fair investigation, the Director of Personnel together with the appropriate administrative officer determines that a member of the CFOT community violated the sexual harassment policy, appropriate action will be recommended including but not limited to:

- a. Training education
- b. A reprimand
- c. Disciplinary sanctions
- d. Termination or expulsion

No recommendation for action will be made without providing the respondent with an opportunity to respond to all complaints raised against them. The respondent will receive timely written notification of the recommendation. The Director of Personnel will keep a separate record of each investigation.

6. Retaliation

No person, including parties and witnesses exercising his/her rights and/or responsibilities on the sexual harassment policy or procedures shall be subject to retaliation or threat of retaliation of any form. Retaliation shall include but is not limited to those actions directed against an individual on the basis of or in reaction to the exercise of rights accorded and/or defined by this policy which affects a person's employment, advancement, scholarship, performance, habitation and/or property. A finding of retaliation or a threat of retaliation will constitute a separate violation of this policy, subject to separate or consolidated disciplinary procedures and is not dependent upon the finding of a violation of any other section of the policy. Complaints of retaliation shall be made to the Director of Personnel.

CADET GRIEVANCE POLICY/PROCEDURE

In even the most relational and caring communities, disagreements and personal, interpersonal events occur which cause friction, discomfort and upset amongst its members. Particularly in living and learning communities where natural hierarchies of power and responsibility must occur - such as teacher and student, supervisor and employee, administrator and faculty - the day-to-day interactions of human beings will occasionally conflict. Add to these working and learning situations, the multicultural demands of differing ethnicity, age, gender, language and experience and the hierarchical traditions within The Salvation Army, misunderstandings can be increased. As each of the above factors can lead to differences in perceived and expressed power over another, the rights of each individual within the community must be considered, protected and honored, to the greatest extent possible. In a spiritual, faith-based community of learning, we **must proactively** address, so as to prevent potential, perceived harassment, exploitation and de-valuing of one another. This policy addresses the process of a cooperative effort to avoid and minimize any harmful interaction of perceptions to each cadet.

There are two basic domains in which the above conflicts can occur and must be considered – **academic matters** and spiritual development, **personal matters** relating more to the rules of treatment of one another. **Academic matters** should be dealt with in the most parsimonious manner and in the tradition of educational processes. Most commonly encountered, a cadet will disagree with the grading assessment of their work, classroom procedures and interactions or, more broadly, the format of courses and curriculum. Disagreements between student and teacher should be handled by the student approaching the instructor to discuss and mediate the concern, **first**. Bear in mind that, in almost every circumstance, the instructor has a greater amount of experience and, usually, formal education in the knowledge domain than the average student and if assessment follows the syllabus and rubrics provided by the instructor for the course, the instructor's view should hold precedence. Failure in this mediation process may remain, however, and the student and instructor, **together**, have further recourse then to the Director of Curriculum (or designee) for ruling. The Director of Curriculum and each party may also seek to have the Academic Review Board consider and mediate the matter. It is strongly advised that instructor and student **together** approach this mediation if needed. Ruling by this second mediator is final in academic matters.

In matters of **personal, spiritual and living condition**, students are to consider the process of the above approach suggested in academic matters, however, often these situations can be more private, anxiety-producing and mentally painful. In our experience, some of these personal conflicts and situations are so distressing, that the complainant (those feeling injured) can NOT approach the perceived offender, and should not without advice and/or support. In these more personal matters, the Director of Personnel is considered the final mediator, advocate and aid for the complainant. The following procedures should be pursued: after careful prayer and searching for God's will and advice, the Director of Personnel should be informed of the complaint. A written statement of the perceptions of the complainant of the incident(s), interaction(s) producing the complaint should be completed. Care must be taken by the complainant to avoid involving other cadets, staff or faculty to "build a stronger support" group, however, a single, individual, officer faculty member may be helpful in providing greater insight and perspective on these matters. The Director of Personnel must then bring the complaint forward to the

accused party and seek understanding, enlightenment and changes; this should occur within 25 days of receipt of the written complaint. This mediation and often educational procedure with the offending person(s) should be completed as quickly and thoroughly as possible and the accused MUST avoid any threat or appearance of retaliation to avoid further conflict and, perhaps, punishment. The decision of the Director of Personnel in mediation and/or punishment must be formally written and provided to both parties in a timely fashion (preferably within 10 days of the interview with the defendant) and is to hold in these matters. If either the complainant or the defendant is not satisfied with the decision, they can appeal to the Training Principal of the College. The appeal must be made within 25 days of the filing of the Director of Personnel's written report/response to the two parties. The Principal will provide the College's final written ruling (generally within 14 days) as a recommendation to the Cadet Review Board; recommendations from this process must ultimately go to the Board of Directors of the College at Territorial Headquarters for final action. When deliberations are complete and final action/resolution has been decided/reached, only formal complaints will enter the permanent files of the Director of Personnel and, depending upon outcome, the cadet(s) involved.

Finally, in matters of **Discriminatory Harassment**: The CFOT strives to maintain a community characterized by a respect for others. Our culture of respect means that no type of discriminatory harassment is to be tolerated. Any member of the CFOT community who witnesses or has been subjected to actions or words constituting harassment is encouraged to report the situation to the Director of Personnel, as soon as possible. All complaints will be investigated promptly and in as impartial and **confidential** manner as possible. All members of the CFOT community are required to cooperate in any investigation of complaints or harassment. A timely resolution of each complaint will be reached and communicated to the parties involved. Cadets suffering conflict or harassment are encouraged to notify the alleged harasser that the behavior in question is offensive and unwelcome; however, failure to do so will not preclude filing a complaint. In addition, by utilizing the College's complaint process, a complainant does not lose the right to file a complaint with any outside enforcement agency when necessary. The Director of Personnel (or designee) will investigate all complaints and every effort will be made to respect the confidentiality of all persons involved, consistent with the officer's duty to investigate and resolve such complaints under federal and state regulations. An attempt will be made to resolve the complaint on an informal basis. If the matter cannot be resolved on an informal basis, the complainant will be encouraged to file a formal complaint, according to the processes specified directly above. A written copy of the complaint will be provided to the person against whom the complaint is being made. The Director of Personnel (or designee) will endeavor, whenever possible, to report the final results of the investigation, including the response of the person against whom the complaint is made and the complainant, to the Training Principal within 45 working days. The Director of Personnel alone will notify the parties of the action(s) to be taken unless appeal is made by either party to the Principal. Any attempt at retaliation or threat of retaliation against any person exercising their right to make a formal or informal complaint or testify or offer evidence connected with the complaint is a violation of this policy.

False Complaints: An individual filing a complaint or grievance in good faith shall not be subject to College sanction. However, if an investigation reveals that a complainant or witness has made deliberately false accusations or been intentionally dishonest, that individual will face disciplinary action,

up to and including termination of cadetship or dismissal, in order to protect the integrity of the policy and process and to protect the person falsely accused.

DISCIPLINARY PROCESS – COMPLIANCE

A cadet who fails to agree to a disciplinary hearing or abide by a disciplinary sanction, takes action to influence or coerce testimony in a disciplinary hearing OR takes action that disrupts or impairs an investigation or hearing, may be found in violation of failure to comply with the disciplinary process. Any cadet who knowingly provides false information in a hearing may also be found in violation of this or other parts of the code.

For any cadet found responsible for a crime or harassment incident meeting the reporting requirements pursuant to the federal Clery Act, including, but not limited to, sexual violence, institutions shall make a notation on the transcript after the conduct process that they were “suspended after a finding of responsibility for a code of conduct violation” or “expelled after a finding of responsibility for a code of conduct violation.” For the respondent who withdraws from the institution while such conduct charges are pending and declines to complete the disciplinary process, institutions shall make a notation on the transcript of such a cadet that they “withdrew with conduct charges pending.” Cadets may appeal for the removal of the above cited notations only to the Principal of the College for Officer Training, provided that such notation shall not be removed prior to one year after conclusion of the suspension; notation of expulsion shall not be removed. If a finding of responsibility is vacated for any reason, any such transcript notation shall be removed.

STUDENTS’ BILL OF RIGHTS (SECTION 6443 OF CLERY ACT)

Every institution shall adopt and implement the following “Students’ Bill of Rights” as part of its code of conduct which shall be distributed annually to students, made available on each institution’s website, posted in campus residence halls and campus centers, and shall include links or information to file a report and seek a response, pursuant to section sixty-four hundred forty-four of this article, and the options for confidential disclosure pursuant to section sixty-four hundred forty-six of this article: “All students have the right to: 1. Make a report to local law enforcement and/or state police; 2. Have disclosures of domestic violence, dating violence, stalking, and sexual assault treated seriously; 3. Make a decision about whether or not to disclose a crime or violation and participate in the judicial or conduct process and/or criminal justice process free from pressure by the institution; 4. Participate in a process that is fair, impartial, and provides adequate notice and a meaningful opportunity to be heard; 5. Be treated with dignity and to receive from the institution courteous, fair, and respectful health care and counseling services, where available; 6. Be free from any suggestion that the reporting individual is at fault when these crimes and violations are committed, or should have acted in a different manner to avoid such crimes or violations; 7. Describe the incident to as few institution representatives as practicable and not be required to unnecessarily repeat a description of the incident; 8. Be protected from retaliation by the institution, any student, the accused and/or the respondent, and/or their friends, family and acquaintances within the jurisdiction of the institution; 9. Access to at least one level of appeal of a determination; 10. Be accompanied by an advisor of choice who may assist and advise a

reporting individual, accused, or respondent throughout the judicial or conduct process including during all meetings and hearings related to such process; and 11. Exercise civil rights and practice of religion without interference by the investigative, criminal justice, or judicial or conduct process of the institution.”

TITLE IX EQUIVALENT DUTIES & RESPONSIBILITIES

As indicated in the procedures for **Reporting Incidents on Campus** and the booklet entitled “Security, Safety and Sensitivity,” **which could present injury, loss of property and/or impair or interfere with the quality of life and learning**, The Salvation Army College for Officer Training is committed to establishing and maintaining a safe environment for all on our Campus. While the above information is intended to meet the initial responsibilities of providing a safe environment and comply with Articles 129A and 129B of the New York State Educational laws and the Clery Act, the types of incidents covered by this information and procedures may, in all likelihood, occur despite our intentions. These Acts go beyond a reporting responsibility and require that the College do all it can in triage and treatment provided in any covered crimes, accidents and actions against an individual. While the College is not a participant in Title IV and the receipt of Federal monies, we cannot ignore our responsibilities to others! Therefore, this document will outline further responsibilities that the College voluntarily undertakes.

The Education Acts and laws specify an individual(s) to be named as the coordinator for all official responses to incidents occurring under our jurisdiction; normally, this would be an official of the College Administration such as the Dean of Students, Ombudsperson or Title IX Coordinator. The College for Officer Training has specifically designated the Director of Personnel and the Assistant Training Principal for Administration to oversee and administer these functions. The functions are to include triage and initial response oversight to involved parties, adjudication, providing the reporting functions (on a “need to know” basis) to internal and external constituencies in a timely, yet sensitive and confidential nature to the degree possible, and prevention and intervention training. Within the Personnel Department, the College maintains a small Campus Health Center facility, a physician (who serves as the Health Care Director and is available on a 24/7 basis) and a nurse (B.S.N., R.N., completing education and training in a Masters in Science degree in Community Health Nursing, available daily from 8:30 to 4:00, M-F). The College further maintains a referral arrangement with mental health professionals (Dr. Nardi) for those needing this professional support. Additionally, the College exists literally 100 yards away from an exceptional Hospital (Good Samaritan Hospital, Suffern, NY) with a first-rate Emergency Room; the College has an excellent relationship with the Hospital allowing our classrooms and lecture hall to be used from time-to-time by their staff. Finally, within the Personnel Department are 8 additional Salvation Army officers (ministers) who can serve in pastoral counselling capacity (in addition to the Director).

Additional specific responsibilities required of the Director of Personnel, the Personnel officers and the Assistant Training Principal for Administration, in their roles in compliance for Campus safety, includes proper reporting to Campus constituencies on incidents and educational and preventative training for

self and others. Enumerated below are these duties, which may be increased if/as needed by events and incidents on Campus:

Attend annual training sessions on judicial processes and triage for incidents

Oversee or perform adjudication and mediation for incidents and prepare and keep records (report to those further necessary)

Educate all new cadets, minimally at Orientation, but preferably by e-mail and website statement about crimes on campus, prevention to maintain safety, accident reporting and avoidance, and all EMERGENCY procedures

File all compliance documents with New York State Education regarding security and safety laws/acts

Write and communicate annual Campus Crime report

Write and communicate the every-other-year minimum Campus Climate Assessment

Oversee and communicate the 10-year compliance documents

Educate the campus on harassment, crime and accident prevention, reporting, vigilance to keep everyone safe, sensitivity to other "cultures" (gender, age, family, and more)

TEAR OFF, SIGN AND TURN INTO DIRECTOR OF PERSONNEL

Upon my initial enrollment and Orientation at the College for Officer Training, The Salvation Army, I received a summary presentation of this document on Safety, Security and Sensitivity, received a full copy of this document and agree to be responsible to the tenor of the document and comply as a cadet, intending to honor God and all my fellow colleagues.

Your signature and date

Addendum

The Salvation Army College for Officer Training is an accredited post-secondary educational institution in the United States of America, and as such, is required to comply with a number of rules, regulations and laws and inform its constituencies concerning these laws. In 2017, the Federal Clery Act (Enough is enough) and Article 129B of the New York State Educational laws were passed and required to be enacted. These laws and The Salvation Army's College responses to them are detailed in the following pages. It is our sincere and supreme hope that the vast majority of circumstances and the responses to incidents surrounding any of these rules, regulations and laws will never need to be addressed, apart from the requirement of keeping all members of our community safe and providing our students, staff, employees, administration and faculty the required information of behaviors and incidents covered by the law. Herein follows the required information for Article 129B in the State of New York from the College.

Code of Conduct (Sections 6439-6443)

The Salvation Army College for Officer Training (hereafter in this Document – "The College") instituted this "Three Ss" booklet along with the "Community Guidelines" as the effective codes of conduct on August 30/31 (2017) for all cadets (students). All entering and returning cadets received these documents at the school opening Orientation meeting and signed a statement indicating their receipt. These receipt statements were returned and maintained in file in the Institutional Research and Accreditation office. This procedure will be repeated every year for new cadets at the initial Orientation sessions to the College, in September of each year.

Rights of Reporting Individuals (Section 6444)

When cadets witness an incident that they believe or a complainant perceives is/as a violation of the Code of Conducts (indicated above), particularly pertaining to sexual assault, domestic violence, dating violence and/or stalking, they are required to report this incident to the Director of Personnel (Title IX Coordinator designated by the College) and obligated to offer support to the complainant. Education Act 129B, specifically, and the College finds the incidents cited above as crimes and particularly heinous. They will be investigated and prosecuted vigorously within the College and the complainants will be advised on any external actions that they might pursue.

Sexual acts between any two persons must be a fully affirmative, consenting activity. Section 6441, Act 129B, defines affirmative consent as follows: "a knowing, voluntary, and mutual decision among all participants to engage in sexual activity. Consent can be given by words or actions, as long as those words or actions create clear permission regarding willingness to engage in the activity. Silence or lack of resistance, in and of itself, does not demonstrate consent. The definition of consent does not vary based upon a participant's sex, sexual orientation, gender identity, or gender expression." This same definition of consent can be applied to participation in any and all activities prohibited in the College's Code of Conduct, for all participants.

Reporting of incidents to the College will result in complainant's or the individual's advisement of their rights to notify campus security, local law enforcement, and/or state police, supported by the College administration (Director of Personnel/Title IX Coordinator), if desired. Title IX Coordinator will be available from the first instance of disclosure of the incident for reporters and complainants. The College Principal (CEO) and Title IX Coordinator have designated the Associate and Assistant Directors of Personnel as two other individuals, suitably and similarly trained, that may be contacted for reports. It is the primary responsibility of these designated officers of the College to provide reporting individuals and complainants with all information and assistance in initiating legal proceedings both internal and outside the College. The College will proceed internally to investigate reported incidents only with the written permission obtained from the complainants and/or reporting parties and will do so in complete confidentiality. Investigation of the incident reported will be undertaken by the Title IX Coordinator, or designate, if the preponderance of evidence warrants this step; this decision is reserved for the above cited official, but can be appealed to the Principal of the College if the reporting parties feel necessary. When an investigation is judged necessary, all parties will be immediately informed (complainant, reporting person and respondent). Timely investigation and deliberations, decisions and judgments will always be a priority and will approximate the schedules used for sexual and other forms of harassment complaints (see 3 Ss booklet and Community Guidelines). Evidence of all of the above in an incident report and investigation will be written and stored in files in the Director of Personnel's office. A sample Incident Report can be found on pages 8 and 9 of this document.

In all cases or incidents brought by formal complaint to the College administration, complete confidentiality, respect for one another and the juris process shall be the sought-after, required objective. Only officials specifically cited in this 3Ss and Addendum document will be allowed access to the incident files; the decision on who has access, confidentiality vs. privacy for the due process and outcomes will be the decision of the Title IX Coordinator. As the Title IX Coordinator, this official is responsible for appointing the separate investigative and judicial teams. The investigative team should include Campus Security or law enforcement (depending upon which received the initial contact) and a representative of the College administration. The first priority for the investigative team is to determine whether a continuing threat exists for any of the parties involved. As members of the Personnel Department are ministers and, hence, experienced in counseling, they together with the enforcement officers (police or Campus Security) should determine whether any parties involved represent a continuing threat to the health of self or others in the community. The second decision that this team should reach on behalf of the individuals and those involved is whether or not to issue "No Contact orders" and to whom. All such "No Contact orders" must remain in the files of the Office of Personnel for at least two years following the incident.

Interim measures and accommodations such as altering class schedules, living arrangements, and other for complainants, reporting individuals and respondents while incidents are being investigated and/or hearings are being conducted, will be made at the initiation and decision of the Title IX Coordinator, an appointed Hearing group member, along with any external legal and law enforcement representation and the College Principal; the Principal may also request legal representation for the College. Individuals involved in incidents requiring interim measures and accommodations may appeal to the Title IX

Coordinator, the Personnel office and the Principal of the College. All decisions and appeals will be filed in the Personnel Office for at least two years following their enactment. The College reserves the right to alter academic schedules, housing, employment, transportation, arranged benefits and any other non-contractual agreements for parties involved to ensure safety, prevent any retaliation or threat thereof and avoid any hostile environment or actions. Any attempts at retaliation by any party will ensure further adjudication and possible added penalties, including dismissal from the College. As indicated earlier in this paragraph, records resulting from additional adjudication and penalties will be housed in the files of the Personnel Department/Title IX Coordinator.

The rights indicated herein for students, faculty, administration and staff are afforded to all pursuant to and by Education Law 129B of the State of New York according to Section 6444(5); a complete copy of this legislation may be obtained upon request from the Accreditation Liaison or the Title IX Coordinator. The College will do all it can to describe for all constituencies the rights, responsibilities and information needed, without discrimination, and in the utmost confidentiality when required. The Title IX Coordinator in his/her initial interaction with a complainant or person reporting an incident must clearly state, "You have the right to make a report to the College Security personnel, law enforcement, local and state, or chose not to report, and to file a formal, written complaint with myself for the institution. You have the right to be protected by the institution from any retaliation from any involved in this incident and to receive assistance, advice and resources, including but not limited to psychological counseling, from your institution."

At this point in time, the College has no legal, formal Memorandums of Understanding with any hospitals, or community help organizations, such as rape crisis centers and domestic violence shelters. We are currently pursuing this for psychological counseling and support and have an informal but strong working relationship with Good Samaritan Hospital and their Emergency Medical staff located directly (one block) from the College grounds. The ER has full forensic and treatment facilities for these incidents.

Finally, any judicial/conduct hearing board proceedings and outcomes that result in penalties against a student such as a suspension or termination of the student at the College will result in an official notice on the student's academic records and transcript. Appeals for removal of any transcript notations must be submitted to the Title IX Coordinator in writing by the recipient of the notation.

Description of Records:

of reports of incidents covered under this ACT129B received, and regarding judicial/conduct hearings stemming from these reported incidents (both items continuing from the beginning of the academic year 2016).

The incidents and outcomes are confidential but have been reported to New York State Education with new 129B forms.

Confidentiality/Privacy (Section 6446)

As has previously been stated and emphasized, confidentiality and privacy is of utmost importance in any incident covered under these laws. Confidentiality of the initial incident depends upon those receiving the report and should be carefully limited to only those with a need to know; it is the Title IX Coordinator's responsibility to determine and limit this information, often informing only those agreed upon with the complainant and or reporting individual. At times, it may be necessary to extend some information to those law enforcement and triage individuals responding; again, the need to know will be determined by the institutional officer receiving the complaint and the complainant. If a hearing is to be conducted, the complainant and reporting individual may again be required to retell and share more widely the details of the incident; privacy of this information should again be the principal goal of all involved.

Campus Climate Assessment (Section 6445)

The College has published an every other year document on this required issue on the College Website. See the Campus Climate report under the drop-down boxes on the web labeled "Hot Spots" and under "About us."

Student Onboarding and Ongoing Education (Section 6447)

As indicated earlier, every year in the Orientation sessions during the first week of September, the "3 Ss" booklet and the "Community Guidelines" are distributed to new students/cadets. A question and answer session follows, however, cadets have usually had so much information given over so short a period that further training would not be warranted or welcomed. Between the Campus Health officer (a trained nurse – Master of Science of Nursing as terminal degree), the "Keep Safe" officer and others in Personnel, as a part of the Community Covenant and Spiritual Formation classes and lectures, a number of informal educational workshops and opportunities are offered or required for all cadets. The specific topics of domestic violence, dating violence, stalking and sexual assault are all so abhorrent to who The Salvation Army ministerial candidates (our cadet students) are, that a formal integrated class incorporating these topics is not pursued as part of our integrated educational experiences. Our sensitivity to others, our Mission statement and our personal integrity are challenged and formed in our worship and educational experiences and violators, when uncovered, are immediately dismissed or removed from the College.