May 1, 2017

RE: A Message from the Manager of Public Safety

As the Manager of the SCF Department of Public Safety, I am responsible for the leadership, planning, and organization of the Public Safety Department. In addition to providing the College community with safety/security matters and emergency management, our department is the liaison with local, state, and federal law enforcement and safety agencies. It is also our responsibility to see that students, faculty, and staff recognize that the Department is a resource that is freely and fully available to all members of the State College of Florida community.

In compliance with the federal Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (the “Clery Act”), 20 U.S.C. 1092, and Campus Sexual Violence Elimination Act, certain colleges and universities are required to publish an annual report concerning various campus safety-related policies and procedures, as well as campus crime statistics. Each year, the Department assembles statistics for the report based on its own records and based on communications with the various campus security authorities directed at acquiring information necessary to the College’s effort to disclose annual crime statistics to the State College of Florida community.

The Department of Public Safety operates 24 hours a day, seven days a week, to maintain a safe, secure and healthy campus environment. We utilize a comprehensive multi-layered approach to public safety including behavioral intervention, critical incident management prevention, planning and response, ID and access control, emergency and mass notification systems, CCTV systems, and social media platforms. We also depend on the support of the College community to share in this responsibility. We urge everyone to follow established College rules, procedures and regulations, and to contact the Department of Public Safety immediately if any suspicious activity is witnessed. Thank you in advance for your collaboration and support. We are here for you and please – See Something, Say Something.

Questions or concerns regarding this report should be directed to the Department of Public Safety.

Best wishes for a happy, healthy and successful year at the State College of Florida.

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Manager of Public Safety
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Mission Statement

State College of Florida exists to support the learning and working environment by helping to promote, create, and maintain a safe, secure and enjoyable campus environment for all members of the College community and its guests. In fulfilling the responsibilities associated with its purpose of existence, the Department of Public Safety (“DPS”) recognizes the overall mission of the College and strives to play a vital role in that mission. Concern for the community’s well-being, desire to provide services and assistance whenever possible, and a constant desire to support the learning environment are all factors that are inherent in our Department’s daily operation and policies.

Annual Clery Report

The Clery Act (the Student Right to Know and Campus Security Act of 1990) and the Higher Education Amendments of 1992 (Public Law 102-325) require an annual report be given. This report includes statistics for the previous three years of crimes that occurred on campus or in off campus buildings owned or controlled by State College of Florida when applicable. This report is updated on an annual basis, posted on our website and available in print copy. State College of Florida also actively notifies all College faculty, students, and staff of its availability.

Status of Campus Security

The College maintains safety and security services 24 hours a day, seven days a week on our Bradenton and Venice Campuses, and 6:30am-10:30pm, Monday – Friday, on our Lakewood Ranch Campus. SCF campus resource officers and security officers are deployed on campus in motor vehicles and on foot to provide quick response, as well as a high degree of visibility and accessibility, to the College community. SCF also maintains a close working relationship with local and county law enforcement agencies. No college security plan can attain maximum effectiveness unless everyone contributes to making it work. All members of the College community are encouraged to become involved and alert College citizens and report any unsafe, suspicious or dangerous conditions. All ideas and contributions to improve safety and security are encouraged and welcome. SCF is always looking for ways to ensure that the College is a safe, secure and healthy environment to study and work. Students are challenged to adopt these as personal objectives while at the College.

Technology

- Call Boxes / Emergency telephones strategically located throughout the Bradenton and Venice campuses.
- Localized and centrally monitored access control systems on the Bradenton and Lakewood Ranch campuses.
- Closed circuit television (CCTV) in use at various public spaces on the SCF campuses.
- Central station-monitored fire alarm system.
- Emergency Notification Systems.
- Panic Buttons
- Various Social Media Platforms such as Twitter, Facebook, & SCF Website
Campus Emergency Response/ Mass Notification

The Mass Notification System used at State College of Florida broadcasts immediate email, text, and voicemail messages to those who have chosen to participate in the program. The College will, without delay, immediately notify the campus community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students, faculty or staff occurring on campus. Taking into account the safety of the community, the College will determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to or otherwise mitigate the emergency.

After the initial notification, follow-up information may be disseminated to the community via the messaging system. State College of Florida maintains a subscription to a third-party voice and email messaging service (Blackboard Connect) that enables SCF administrators to create voice and email emergency alerts for members of the College community and to send them to a list of subscribed cell phone or other wireless device users, as well as email accounts.

Voice, text and email message emergency alerts are only one element of SCF’s comprehensive emergency response protocol that provides for rapid notification to the College community about situations or events that are occurring on campus and its surrounding areas.

Emergency response and evacuation procedures are tested annually by the College. SCF uses a combination of methods to communicate a campus emergency:

1. SCF outdoor and indoor Valcom live audio alert system.
2. SCFconnect and SCF email
3. Simultaneous broadcast of emergency information by the College’s Critical Incident Management Team to the College community via email, text and voice messaging, and digital display boards on campus.
4. Social Media platforms such as Twitter, Facebook, and the SCF Website

Crime Prevention and Awareness

Reporting Crimes and Emergencies

SCF DPS encourages anyone who is the victim or witness to a crime on an SCF campus, college-owned property and/or a college sponsored event to promptly report the incident to the SCF Department of Public Safety. Officers respond to all reports of accidents, crimes, suspicious persons/activity, hazards and medical emergencies, as well as service calls. Victims and witnesses of crimes may call extension 65550 on the Bradenton Campus, 61550 on the Venice Campus and 67155 on the Lakewood Ranch Campus. In life-threatening situations, emergency services can be summoned by calling 911 from any campus phone. Assistance can also be summoned by emergency call boxes located across campuses.

Anonymous Reporting

“Silent Witness Program” -- If you wish to report a crime or other suspicious or threatening activity occurring on or off campus you can report it and remain anonymous. Go to the Public Safety webpage http://www.scf.edu/Administration/Public_Safety/default.asp. You will then have the opportunity to report an event without revealing your identity by clicking on the silent witness link.
Importance of Reporting
By reporting alleged crimes and other suspicious circumstances directly to Public Safety, the alleged crime or suspicious circumstance will be included in the Public Safety daily log, the daily report of crimes or incidents reported to Public Safety, and it will be included in the Annual Security Report (if appropriate). Additionally, Public Safety will be able to issue timely and appropriate warning bulletins alerting the campus community to the issue. Public Safety reports are confidential. When reporting a crime or suspicious circumstance, you need not state your name or the name of the victims, witnesses, etc.

Crime Presentation Workshops

The Department of Public Safety, as well as other College departments, offers a variety of safety and crime prevention presentations. Topics include personal safety and crime prevention, crime and violence prevention, crisis and emergency management, date/acquaintance rape programs, fire and life safety, drug/alcohol awareness, domestic violence, and victim’s assistance. Crime prevention, personal safety and drug/alcohol workshops are offered at least once a semester, and presentations frequently involve experts from public and private organizations. If interested, please contact Public Safety at 752-5550 or ext. 65550.

Student Right to Know/Timely Warning

In an effort to prevent crime and increase safety on campus, information regarding major or repetitious incidents may be forwarded to certain College offices, including the office of Communications and Marketing. When circumstances require immediate notification throughout the College community, timely and appropriate bulletins are produced and circulated. Electronic correspondences and Social Media platforms are used to inform the community of such incidents as well. Additionally, the Department of Public Safety daily log is maintained; the log contains the location, date, time, description and disposition of the incident, and is updated every two days.

Sexual Offender Information

The Federal Campus Sex Crimes Prevention Act (“Megan’s Law”) requires institutions of higher education to issue a statement advising the campus community where law enforcement agency information provided by a state concerning registered sex offenders may be obtained. It also requires registered sex offenders to provide notice, as required under state law, of each institution of higher education in that state at which the person is employed, carries on a vocation or is a student. The pertinent website address for securing the related information is www.fdle.state.fl.us. If a student has any additional questions concerning this act, please contact the Department of Public Safety.

Safety Escorts

Public Safety provides a safety escort service to members of the College community who need a safety escort from campus buildings to and from College parking lots. Students, faculty and staff are asked to walk with others when possible and to use paths that are well lit.
Emergency Call Boxes – Blue light call boxes are at various locations within the Bradenton and Venice campuses and parking lots. They provide immediate contact with Public Safety and can be used to request assistance and or provide information.

Electronic Systems – The Department of Public Safety monitors intrusion and fire alarms campus-wide, with the assistance of a computerized monitoring system. Access into certain facilities is controlled through the use of a proximity card access control system.

Department of Public Safety

The Department of Public Safety serves all students, staff, faculty and guests of the College. All criminal offenses on-campus or at College controlled property should be reported to Public Safety.

The Department operates 24 hours a day, seven days a week. The staff includes a manager of public safety, an assistant manager of public safety, one sergeant, one tech specialist, seven campus resource officers, fifteen campus security officers, and four communication personnel, who are student assistants, supervised by a public safety supervisor, to augment the patrol force.

The Department works cooperatively with the Manatee County and Sarasota County Sheriffs’ Offices and other law enforcement agencies to ensure the safety of our campus community and for assistance when a crime has been reported.

Access to Campus Facilities

Most campus buildings and facilities are accessible during normal business hours, excluding holidays. Classrooms, labs and other educational facilities are restricted to students, faculty and staff who have a legitimate need to be there. For safety reasons, many classrooms and labs are locked when not in use and are restricted from general public access. The Athletic Department, the Academic Resource Center, the Library, and other select College service areas have varying hours of operation. For “after-hours” access to certain facilities, students will need permission from the faculty member emailed to the appropriate public safety office, and a valid student ID card must be presented to security personnel to be admitted.

Maintenance of Campus Facilities

Public Safety officers, as part of their general patrol procedure, generate a work order to Facilities Management when any defective lighting or unsafe condition on campus is noted.

Students, faculty and staff are encouraged to report any safety or security concerns directly to the Department of Public Safety.
Missing Student Procedure

If a member of the College community has reason to believe that a student is missing, they should immediately notify the Department of Public Safety at 941-752-5550. All possible efforts will be made to locate the student to determine his or her state of health and well-being through the collaboration of Public Safety and the Student Services Division. If search efforts are unsuccessful in a reasonable amount of time as determined by the Student Services Division in consultation with the Manager of Public Safety, OR if it is apparent immediately that the student is a missing person (e.g. witnessed abduction), OR if it has been determined that the student has been missing for more than 24 hours, the Department of Public Safety will assist in contacting the appropriate law enforcement agency to report the student as a missing person.

Concurrently, College officials will endeavor to determine the student’s whereabouts through contact with friends, associates and/or employers of the student. College officials will seek to determine whether or not the student has been attending classes, labs, and scheduled organizational or academic meetings. If located, verification of the student’s state of health and intention of returning to campus is made. When and where appropriate, a referral will be made to MedPsych Systems.

If the missing student is under the age of 18 and is not an emancipated individual, the Department of Public Safety will notify the student’s parent or legal guardian immediately. The Department of Public Safety will cooperate and assist the primary investigative agency in all ways prescribed by law.

Sexual Acts

On March 7, 2013, President Obama signed a bill that strengthened and reauthorized the Violence Against Women Act. Included in the bill was the Campus Sexual Violence Elimination Act (Campus SaVE), which amends the Jeanne Clery Act and affords additional rights to campus victims of sexual violence, dating violence, domestic violence and stalking. It requires the College to compile statistics for dating violence, domestic violence and stalking (starting in January of 2014), and begin reporting the statistics in 2015. It also requires the College to provide policy statements addressing domestic/dating violence and stalking in addition to sexual violence, to have programs available addressing the prevention of and response to these crimes, and to establish the definitions that the College will use for classifying these offenses. The programs, policy statements and definitions are included in this report.

Prohibition Statement

State College of Florida, Manatee-Sarasota (SCF) strives to provide a community where safety, equality, respect and healthy relationships are valued. SCF fosters a campus environment that is free from intimidation, and one in which students may be educated to their fullest potential. SCF will not tolerate sexual assault, dating violence, domestic violence, stalking, or any form of sexual harassment from students, faculty, staff, volunteers, visitors, or any persons whether online, or at any College campus, or sponsored event. SCF also encourages the college community to report incidences that relate to these offenses.
Sex Offenses, Domestic Violence, Dating Violence and Stalking

It is a violation of the College code of conduct, as well as state law, to commit an act of sexual assault, domestic violence, dating violence or stalking. State College of Florida Policy #2.44.01: Harassment & Discrimination Related Conduct (Including Sexual & Gender Based Harassment, Sexual Assault, Sexual Exploitation, Interpersonal Violence, Stalking, and Complicity & Retaliation) is intended to promote a safe environment that is free of these crimes. Specifically, the policy provides for:

- Comprehensive education and prevention programs that inform the college community about the risk and myths that contribute to sexual assault, domestic violence, dating violence and stalking.
- Procedures sensitive to victims when responding to reports of these alleged crimes, including informing victims about their right to file criminal charges, as well as the availability of medical assistance, counseling, support services and accommodation, if reasonably available.
- College disciplinary sanctions for those who commit the above acts.

Programs and Training (Title IX Safe Harbor Initiative at SCF)

Interpersonal Violence and its Impact on our Lives and our Work: This session was created at SCF to address the issue of providing change on a cultural level on our campus. We have many work force training programs and some of these fields involve considerable exposure to violence and trauma. This training gives students an introduction to Title IX at State College of Florida. Those in attendance also learn about Interpersonal Violence under Title IX and current statistics for sexual harassment and sexual violence on college campuses. All trainees complete Adverse Childhood Experience Study (ACE) quiz and keep the information for themselves. This quiz is used to help trainees identify trauma in their own life as well as better understand the impact of trauma on the lives of those they work with. This session ends with information on building resilience and self-care as the students who attend this session are future nurses, public safety workers and others who may be exposed to personal trauma on a regular basis as part of their future work. We also provide all off and on campus resources at SCF.

“Shut up or I’ll kill you”. Intimate Partner Violence and College Students: Domestic Violence (Dating violence and Intimate Partner Violence) is a common problem among college aged students with 43% of college women reporting having experienced violent and abusive dating behaviors. As part of our Title IX education program, we developed this section to give students a deeper understanding of the difference between healthy and unhealthy relationships as well as how to identify the pattern of violence and where to turn for help. We also provide all off and on campus resources at SCF.

Shining a light in the darkness: College Students, Violence and Mental Health: This session was also created at SCF to address the issue of providing change on a cultural level on our campus. The impact of Mental Health issues on college students is on the rise nationally with 1 in 3 students reporting prolonged depression. Experiencing violence can lead to serious mental health problems or compound problems for those already struggling. Understanding the impact of violence and mental health is important as we educate our students about the types of incidents that are included under Title IX. This presentation explains the 5 most common types of mental health issues for college students: Anxiety & Stress, Substance Misuse, Eating Disorders, Depression and Suicide. The session includes thoughts on what students who suffer from mental health issues want other students to know as well as resources for those who need assistance. We also provide all off and on campus resources at SCF.
“We only met once”: Stalking and College Students: College students are twice as likely to be stalked as the general public, but are less likely to report stalking to the police. As part of our Title IX education program, we created this session to help our students have a more thorough understanding of Stalking. During this training session, we discuss the issue of stalking and provide insight into how someone can tell if they are being stalked and how they can access resources. We discuss the relevant statistics and provide thoughtful ways that someone can help a friend. We also provide all off and on campus resources at SCF.

“Who are you?” How to be an Active Bystander: This session was created at SCF to engage our students in being active bystanders. By teaching students how to intervene safely (when possible) we hope to change the culture of our campus. Students are taught 20 ways to be an effective bystander and how to use direct intervention, distraction/humor or seeking support as tools to assist someone in need. Social norms and the power of the bystander are discussed in this interactive session that includes live polls, videos and small group work. We also provide all off and on campus resources at SCF.

Let’s Talk about Consent: This session was created at SCF to engage students in what can sometimes be an awkward conversation – the issue of consent in relationships. During this training we cover statistics that apply to campus sexual assault and the state specific law that defines consent. We have in-depth discussions about circumstances that render a person incapable of consent (incapacitation due to alcohol or drugs). The students learn what consent looks like and understand the concepts. An online “Consent Quiz” and the “Consent Tea” Video are used to engage students in this training session. We also provide all off and on campus resources at SCF.

Title IX and Responsible Employees at SCF: This session provides those identified as Responsible Employees at State College of Florida, Manatee - Sarasota with an overview of Title IX including the types of incidents included as well as their duty to report sexual misconduct and consequences for failing to report. The procedures for responding to a student’s request for confidentiality are discussed. Trainees are given information on the school’s sexual misconduct policies and procedures. The requirement to provide students with information about available confidential resources for victim advocacy, counseling, and other support services; their right to file a Title IX complaint; and the option of reporting to campus or local police is also reviewed. The session includes practice scenarios that are reviewed and discussed in small groups. Information on self-care and building resiliency is included to help those who have to hear this difficult information process it in a healthy way.

Responsible Employee Table Top Exercise: This dynamic and interactive section follows a Title IX incident from initial outcry through investigation and disposition. The session engages those in attendance in their role at the College (faculty, staff, club advisor, public safety, Title IX Coordinator/Deputy Coordinator, and advocate) to work through the scenario from beginning to end and then review the process that was taken and identify areas of strength and any weaknesses.

“Why do I need to understand Title IX?” Creating a Culture of Safety, Equality and Respect at SCF (Title IX Overview for Students): This session provides those in attendance with an overview of Title IX including the types of incidents included as well as information on how to prevent and identify sexual misconduct, including incidents involving same-sex violence and rape-tolerant attitudes. Students are taught the school’s definition of consent applicable to sexual conduct and given examples. Information about how the school analyzes whether conduct was unwelcome under Title IX as well as whether
unwelcome sexual conduct creates a hostile environment is provided. Students are taught the various reporting options, including formal reporting and confidential disclosure options as well as any time frames set by the school for reporting. The school’s grievance procedures used to process sexual violence complaints and disciplinary code provisions relating to sexual violence and the consequences of violating those provisions are provided. Information on the effects of trauma, including neurobiological changes and the role alcohol and drugs often play in sexual violence incidents is discussed. Information on how to report sexual violence to campus or local law enforcement and the ability to pursue law enforcement proceedings simultaneously with a Title IX complaint covered. A clear statement that Title IX provides protections against retaliation is included. A brief understanding of bystander intervention is provided and supplemented with a full session bystander intervention training offered separately.

“Why do I need to understand Title IX?” Creating a Culture of Safety, Equality and Respect at SCF (Title IX Overview for Employees): This session provides those in attendance with an overview of Title IX including the types of incidents included as well as information on how to prevent and identify sexual misconduct, including incidents involving same-sex violence and rape-tolerant attitudes. Trainees learn to respond appropriately to reports of sexual misconduct and how to assist students who may have experienced this type of misconduct. Trainees are given guidelines on how to report sexual misconduct and how to protect students’ confidentiality to the extent permissible. Those in attendance learn to provide contact information to students for reporting options and on- and off-campus victim resources (victim advocacy, housing assistance, academic support, counseling, disability services, health and mental health services, and legal assistance). The session includes practice scenarios that are reviewed and discussed in small groups. Information on self-care and building resiliency is included to encourage those who may have to hear this difficult information process it in a healthy way.

**Reporting**

Victims of sexual assault, domestic violence, dating violence or stalking are strongly encouraged to take some type of action following the incident. The College’s primary concern is the victim, personal safety, proper medical attention and counseling. Victims should report the incident as soon as possible, since time is a critical factor for evidence collection and preservation. Victims may contact any of the following resources for confidential information concerning counseling, mental health or medical services:

**On Campus Resources**

- Department of Public Safety  
  Office Location: Bldg. 14 Rm. 127
- Title IX Coordinator  
  Office Location: Bradenton Campus Bldg. 1 Rm. 127
- SCF Title IX Deputy Coordinator (Students)  
  Office Location: Bradenton Campus Bldg. 1 Rm. 105
- SCF Title IX Deputy Coordinator (Faculty & Staff)  
  Office Location: Bradenton Campus Bldg. 7 Rm. 124
- SCF Title IX Deputy Coordinator (Students)  
  Office Location: Bldg.19 Rm. 175
- SCF Title IX Deputy Coordinator (Students)  
  Office Location: Venice Campus Bldg. 100 Rm. 156  
  941-752-5550
  941-752-5267
  941-752-5429
  941-752-5506
  941-752-5583
  941-408-1416
On Campus Resources (cont.)
SCF Title IX Student Life Advisor 941-752-5603
  Office Location: Bradenton Campus Bldg. 14 Rm. 134
MedPsych Systems- Student Assistance Program 941-363-0878 ext. 2170
  Monday – Friday 830am-5pm

Off-Campus Resources
Centerstone (main number) - Rape Crisis Hotline 941-708-6059
Hope House (Manatee) 941-747-8499
  E-mail info@hopefamilyservices.org
SPARCC (Safe Place and Rape Crisis Center) 941-365-1976
Domestic Abuse Intervention 941-426-3111

Manatee County
Sheriff’s Office 941-747-3011
Bradenton Police Department 941-932-9300
Palmetto Police Department 941-723-4585
State Attorney’s Office 941-747-3077
Hope Family Services 941-747-8499
Center of Abuse and Rape Emergencies 941-627-6000
Comprehensive Med/Psych Services (SCF Students) 941-363-0878 ext. 2170
SCF Employee Assistance Program 800-272-7252
Centerstone Rape Crisis Hotline 941-708-6059

Sarasota County
Sheriff’s Office 941-861-5800
Sarasota Police Department 941-366-8000
Venice Police Department 941-486-2444
North Port Police Department 941-429-7300
State Attorney’s Office 941-951-5400
Safe Place & Rape Crisis Center 941-365-1976
Coastal Behavioral Health 941-953-0000
Comprehensive Med/Psych Services (SCF Students) 941-363-0878 ext. 2170
SCF Employee Assistance Program 800-272-7252

Charlotte County
Charlotte County Sheriff’s Office 941-205-5636
CARE – Center for Abuse & Rape Emergencies 941-627-6000
  24 Hour Crisis Hotline
For possible criminal prosecution, victims of a sexual assault may report the incident directly to the Manatee County or Sarasota County Sheriff’s Office by dialing 911, or SCF Department of Public Safety at 941-752-5550. For possible criminal prosecution, victims should preserve any evidence of the attack and should not bathe or change clothing until they have been examined by proper authorities.

Police reports are confidential and information in the report may not be released to College officials without the victim’s permission. College officials, upon request, will assist victims in the filing of a police report. Reports filed only with College officials will not automatically generate a police report or criminal investigation unless the victim so desires. The decision of the victim to pursue, or not pursue, some course of action in such offenses is honored and respected. Even if a police report is filed, a victim may request the College to conduct a separate investigation to determine if College code of conduct regulations were violated.

The victim may also contact the Department Public Safety or the Title IX Coordinator to begin a College investigation without filing a police report.

College investigations can only be conducted if the suspect is a member of the College community. Should an investigation of such an incident result in College judicial proceedings, procedures are described in the State College of Florida Student Code of Conduct (College Procedure 4.10.1), Disciplinary Proceedings for Violation of Standards of Student Behavior. Once allegations are made, both the victim and the accused may request changes in academic schedules or other arrangements. Both the accused and accuser will be informed of the outcome of any disciplinary proceeding. For more information please refer to the online sexual crime resource guide located within the Public Safety website.

**State College of Florida Campus Security Authorities (CSA) Policy Statement**

At SCF Campus Security Authorities (CSA) are employees with administrative or supervisory responsibilities on campus or who have been designated as CSAs.

A CSA is an SCF employee who has an obligation under the law to notify Public Safety of alleged Clery Crimes that are reported to them, which they conclude have been made in good faith. The College’s CSAs include, but are not limited to, the following employees or categories of employees who serve in a managerial, leadership, or supervisory position who have significant responsibility for the welfare of our Students, Faculty, or Staff:

- Senior leadership (e.g., College President, Campus Presidents, Vice Presidents, Special Assistants to the President, Executive Deans, including Associates and Assistants)
- Other Administrators/Professional Staff (e.g., deans, directors, program directors, chairpersons/discipline coordinators, and managers – in all administrative and academic areas)
- Other Designated Staff (e.g., Title IX Coordinator/Equal Opportunity Officer; Assistant Director, Title IX/Equal Opportunity, Manager, Student Services; Coordinator, Student Conduct; Assistant Director, Employee Relations; Campus Director, Organizational Development and Human Resources)
- Director, Study Abroad and Global Exchange
- All faculty and staff members who accompany students on College-related trips, both within the U.S. and abroad
• All faculty or staff advisors to student organizations or activities
• Counselors
• Ombudspersons
• Designated Campus Safety and Security Staff (e.g., Security Field Officer; Security Officer)

A current list of CSA’s will be kept and updated at least annually.

**State College of Florida Complaint Procedures**

The College’s informal and formal procedures for filing a complaint are set out below and are intended to afford prompt response to charges of prohibited conduct, which includes sexual assault, domestic violence, dating violence or stalking, to maintain confidentiality and fairness consistent with applicable legal requirements and impose appropriate sanctions on violators of this policy.

• **Formal Complaint**

  Persons wishing to file a formal complaint of sexual crimes, domestic violence, dating violence, dating violence or stalking will be directed (and, whenever possible, escorted) to either the Department of Public Safety or Title IX Coordinator or Deputy Coordinator, which is primarily responsible for conducting college investigations of these complaints. In cases involving sexual crimes, local law enforcement agencies will be called upon the accuser’s request, and that agency will lead any criminal investigation. All formal complaints will be treated confidentially. Accusers will be informed of available support services, such as victim advocacy, orders of protection, and changes in academic or work schedules.

  Accusers will be informed about the outcome of any investigation undertaken by the Department of Public Safety. In addition, SCF will inform members of the College of reported on campus sexual crimes, domestic violence, dating violence or stalking, without identifying the victim.

  Whether or not criminal charges are filed, the College or the accuser may file a complaint under the Student Code of Conduct (College Procedure 4.10.1) Disciplinary Proceedings for Violation of Standards of Student Behavior. Reports made to the Department of Public Safety will automatically be referred to the Title IX Coordinator.

  The College recognizes that sexual assault, domestic violence, dating violence or stalking may also be considered sexual harassment. A person alleging to have been a victim of such acts may also utilize the complaint and investigatory procedures set forth in the College policy against sexual harassment in order to remedy any hostile environment. Sexual harassment complaints will be investigated by the College equity officer or other designated staff as appropriate. All conduct proceeding against students, however, will be resolved through the Disciplinary Proceeding for Violation of Standards of Student Behavior. All discipline for employees will be addressed through the Office of Human Resources.

• **Informal Complaints**

  If a person reports to a College administrator, department head or faculty member that she or he has been a victim of sexual assault, domestic violence, dating violence or stalking but chooses not to file a formal complaint at that time, a student complainant will be immediately
referred to the College Title IX Coordinator, where the victim is offered available support services on and off campus. College personnel making informal complaints will be directed to the College equity officer, where the victim is offered available support services on and off campus. All complaints will be treated with confidentiality and safety considerations.

When a complainant does not consent to disclosure of his or her name or other identifiable information, the College’s ability to respond to the complaint may be limited.

State College of Florida is aware of the sensitive nature of sexual assault, domestic violence, dating violence and stalking complaints, and can make accommodations to address the accuser’s need for separation from the accused, while also balancing the rights of the accused. College sanctions, up to and including separation from the College, may be imposed upon those determined to have perpetrated a sexual offense, domestic or dating violence, or stalking.

**Drug Free Campus**

Under Federal legislation entitled The Drug Free Workplace Act of 1988, and The Drug Free Schools and Communities Act of 1989, the State College of Florida has adopted a Drug Free Schools and Campuses Policy (#1.32.01) and a Drug Free Campus Rule (#6HX14-1.32)

**State College of Florida Drug Free Schools and Campuses Policy**

The purpose of this administrative procedure is to provide the policy guidelines for SCF’s Drug-Free Schools and Campuses Program.

Under Federal legislation entitled The Drug Free Workplace Act of 1988, and The Drug Free Schools and Communities Act of 1989 (collectively the "Act "), no institution of higher education shall be eligible to receive funds or any other form of financial assistance under any federal program, including participation in any federally funded or guaranteed student loan program, unless it has adopted and implemented a program to prevent the use of illicit drugs and abuse of alcohol by students and employees. The Act requires the annual distribution of the following information to students and employees.

State College of Florida, Manatee – Sarasota is committed to providing a drug free environment for all its employees and students. SCF will not tolerate the manufacture, distribution, possession or use/abuse of alcohol or illegal drugs. Employees and students of the College are prohibited from engaging in the unlawful possession, use or distribution of drugs and alcohol on the College’s property or as any part of the College’s business activities or sponsored functions. Any employee using prescribed or over-the-counter medication, which may affect work performance or create a safety hazard, shall notify his/her immediate supervisor. The College will impose sanctions that are consistent with federal, state and local laws on students and employees.

A. **AUTHORIZATION**

The President authorizes the office of Human Resources (for employees) and the office of the Vice President of Strategic Enrollment Management (for students) to oversee the coordination and enforcement of the College policy on the use of illicit drugs and abuse of alcohol.
B. EDUCATION
Each new employee and student at the College will receive educational material, which describes the health risks associated with the use of illicit drugs and abuse of alcohol. Information pertaining to SCF’s Employee Assistance Program (EAP) will be provided to employees at the time of hire. Information regarding appropriate services available on campus and/or within the community is available to students through the office of the Vice President of Strategic Enrollment Management and in the Student Handbook. The College’s Drug-Free Schools and Campuses Program (Procedure 1.32.01 and Appendix A) will be distributed to all employees upon hire and annually to each current employee as prescribed in (34 Code of Federal Regulations Section 86.100 Subpart B). This will include; information about the standards of conduct, the applicable legal sanctions, health risks, available counseling/treatment programs and disciplinary sanction.

C. DRUG PREVENTION PROGRAM
The College’s drug prevention program includes the following:

1. The annual distribution in writing to each employee, and to each student who is taking one or more classes for any type of academic credit except for continuing education units, regardless of the length of the student's program of study, of—

   a) Standards of conduct that clearly prohibit, at a minimum, the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees on its property or as part of any of its activities;
   b) A description of the applicable legal sanctions under local, State, or Federal law for the unlawful possession or distribution of illicit drugs and alcohol;
   c) A description of the health risks associated with the use of illicit drugs and the abuse of alcohol;
   d) A description of any drug or alcohol counseling, treatment, or rehabilitation or re-entry programs that are available to employees or students; and
   e) A clear statement that State College of Florida, Manatee – Sarasota will impose disciplinary sanctions on students and employees (consistent with local, State, and Federal law), and a description of those sanctions, up to and including expulsion or termination of employment and referral for prosecution, for violations of the Drug-Free Schools and Campuses Program. A disciplinary sanction may include the completion of an appropriate rehabilitation program.

2. A biennial review by State College of Florida, Manatee – Sarasota of its program to—
   a) Determine its effectiveness and implement changes to the program if they are needed; and
   b) Ensure that the disciplinary sanctions described in (Appendix A) are consistently enforced.
POLICY:

A. MAINTENANCE OF A DRUG FREE WORKPLACE

1. Drug Free Certification

All employees of the College will be required to sign a receipt for the drug-free campus program document which affirms that the employee:

Will not possess, sell, purchase, deliver, use, manufacture or distribute illegal drugs, alcohol, or controlled substances while present on any College campus, while in attendance at any College sponsored event; or, while conducting authorized College business; or commit any offense relating to the sale, purchase, delivery, use, manufacturing or distribution of illegal drugs or controlled substances;

Agrees to submit to drug testing if the College administration determines there is “reasonable suspicion” that the employee has used drugs/alcohol in violation of the College policy. “Reasonable-suspicion drug testing” means drug testing based on a belief that an employee is using or has used drugs/alcohol in violation of the employer’s policy drawn from specific objective and articulable facts and reasonable inferences drawn from those facts in light of experience. Among other things, such facts and inferences may be based upon:

a) Observable phenomena while at work, such as direct observation of drug/alcohol use or of the physical symptoms or manifestations of being under the influence of a drug/alcohol.

b) Abnormal conduct or erratic behavior while at work or a significant deterioration in work performance.

c) A report of drug/alcohol use, provided by a reliable and credible source.

d) Evidence that an individual has tampered with a drug test during his or her employment with the current employer.

e) Information that an employee has caused, contributed to, or been involved in an accident while at work.

f) Evidence than an employee has used, possessed, sold, solicited, or transferred drugs while working or while on the employer’s premises or while operating the employer’s vehicle, machinery, or equipment.

By way of illustration, and not limitation, such objective and articulable facts may include detection of the odor of alcohol or marijuana on or about an employee, erratic or unsteady gait or mannerisms, slurred speech, admission by the employee, etc. Whenever practicable, corroboration of such facts and observations from more than one (1) witness shall be sought.

If identified as exhibiting these characteristics, the employee will be referred to the Human Resource Officer or campus designee who will determine the need for testing and make the appropriate referral if deemed necessary. If an employee is requested to
submit to a test, a notice of the employee’s rights regarding the drug testing will be provided to the employee prior to testing. All specimen collection and testing for drugs shall comply with proper chain of custody and confirmation testing protocols and shall generally follow procedures established under Florida worker’s compensation law. Employees who refuse to submit to testing may be subject to appropriate disciplinary action, up to and including termination.

Employment of all personnel at SCF is subject to policies of the District Board of Trustees. New Employees who refuse to sign a receipt for the drug-free campus program document will be refused employment at the College. Existing employees who refuse to sign a receipt or otherwise acknowledge the drug-free campus program may be subject to appropriate disciplinary action, up to and including termination of employment.

2. Pre-Employment Drug Testing
SCF will require pre-employment drug testing for those positions where it is required by law, or another agency or entity for collaborative employment, such as but not limited to Class C vehicle licensed drivers, health sciences clinical instructors, etc. In such cases, the College will follow all legal requirements and protocols.

3. Employee Assistance
An employee with an alcohol or drug abuse problem may voluntarily access the College’s Employee Assistance Program for treatment of this problem. Such a self-referral that is accomplished prior to any disciplinary action being recommended would be completely confidential. The College’s insurance will provide coverage for such treatment in accordance with the provisions of the policy in force at the time of treatment.

All employees who complete a federal, state or local certified substance abuse treatment program and do not illegally use any controlled substance in violation of Section II A of this policy are protected under the Americans with Disabilities Act of 1990, as amended, and the Rehabilitation Act of 1973.

An employee who violates the Drug-Free Workplace provisions for the first time, at the College’s discretion, may be offered the option of enrolling in a treatment program for drug or alcohol abuse through the College’s Employee Assistance Program. The College’s health insurance program will provide coverage for such treatment in accordance with the provisions of the policy in force at the time of treatment. The College will monitor the employee’s compliance with the treatment plan, and successful completion of the treatment will be a condition of continuation of regular employment with the College. The employee may be subject to periodic random testing during the first year, following completion of a treatment program.

An employee who enters a rehabilitation program and fails to respond or, after completing treatment, resumes the use of illegal drugs, controlled substances, or alcohol, will be subject to termination or whatever administrative action is deemed appropriate.
The office of Human Resources will coordinate employee rehabilitation efforts and the reinstatement of employees who had been administratively referred for treatment and are returning to work drug-free.

4. Violations
Conviction of an offense relating to the possession, sale, purchase, delivery, use, manufacturing or distribution of illegal drugs or controlled substances will be considered a violation of this policy.

The term “conviction” means an adjudication of guilt by any judicial body charged with the responsibility to determine violations of the federal or state criminal drug statutes.

An employee who is convicted of a drug-related offense which occurred on campus or while in attendance at any College-sponsored event, or while conducting authorized College business, will be disciplined up to and including termination from College employment.

Any employee convicted of any alcohol or other drug related offense must notify the Administration within five (5) days of such conviction. Failure to do so may result in disciplinary action.

(Appendix A) DRUG-FREE CAMPUS PROGRAM

SCF is committed to providing its students and employees the opportunity for advancement academically, on the job, and in life. Abuse of drugs and alcohol, has been proven to hamper individuals’ ability to take advantage of such opportunities.

Consider the facts:
Alcohol and other drug abuse is a serious workplace problem. According to the 2003 National Survey on Drug Use and Health, approximately 10% of America’s workforce, some 14.9 million full and part-time employees, regularly abuse or are dependent on alcohol or drugs.

The National Institute on Alcohol Abuse and Alcoholism reports that approximately 14 million Americans have an alcohol problem.

Workers who use alcohol and other drugs affect everyone. In fact, studies show alcohol and other drug users:

- Are far less productive.
- Use three times as many sick days
- Are more likely to injure themselves or someone else.
- Are five times more likely to file workers compensation claims.

Alcoholism is the fourth leading cause of death in the U.S., ranking only behind mental illness, heart disease, and cancer.
Drug use and alcohol abuse increase the chances of crime, violence, injuries, automobile accidents, heart disease, and cancer. Young people (15 to 24 years of age) make up the only age group in the U.S. whose life expectancy is decreasing due to alcohol and other drug abuse.

Ten percent of the American workforce abuse illegal and prescription drugs.

Alcohol and other drug use activities can carry severe penalties. Under Florida law, depending on the type and amount of drug involved, a person convicted of using, possessing, selling, purchasing, distributing or manufacturing a controlled substance is subject to penalties ranging from probation to thirty (30) years in prison and fines up to $500.00. Federal penalties for illegal drug activities carry prison sentences ranging from probation to life in prison as well as more severe fines. Alcohol and other drug convictions can also result in the loss of driving privileges.

**SCF ALCOHOL AND OTHER DRUG-FREE POLICY**

Congress has recognized the epidemic affliction alcohol and other drug use is having on an individual and American society. The Drug-Free Workplace Act of 1988 and the Drug-Free Schools and Communities Act Amendment of 1989 were passed and implemented at a result. SCF, in order to accept Federal grants and awards, must adhere to the Drug-Free Schools and Campuses Regulations, 34 Code of Federal Regulations Section 86.100 Subpart B – Institutions of Higher Education. SCF will not tolerate the possession, use, or distribution of illicit drugs and alcohol, or abuse of prescription drugs by students and employees, on any SCF campus or at any SCF sponsored event. Authorization for the availability of alcoholic beverages at specified events may be granted by the President of the College in accordance with policies of the Board of Trustees. SCF adopts the following policy in accordance with its commitment to its students and employee

1. Any student or employee who possesses or uses alcohol, illegal drugs, or abuses prescription drugs on any SCF campus, in any off-campus housing sanctioned by the College, or at any SCF sponsored event off campus will be subject to disciplinary action to include dismissal in some cases. Disciplinary action for students is outlined in the SCF Student Handbook. Disciplinary action for employees is outlined in the SCF Rules and Procedures Manual.
2. Any student or employee who illegally sells or manufactures alcohol or other drugs on any SCF campus or at an SCF sponsored event off-campus will be subject to disciplinary action as outlined in the SCF Student Handbook and SCF Rules and Procedures Manuals. SCF may require proof that the individual is drug free after using drug rehabilitation or another accepted intervention.
3. The college has the responsibility to refer for prosecution anyone engaging in illegal alcohol or other drug activity on SCF campuses or at SCF sponsored events.
4. Any student or employee convicted of any alcohol or other drug related offense must notify the Administration within five (5) days of such conviction. Failure to do so may result in disciplinary action.
5. Any student or employee using prescribed or over-the-counter medication, which may affect educational or work performance or create a safety hazard, shall notify the Office of Student Services (if a student) or immediate supervisor (if an employee). Appropriate action will be taken to prevent concerns on campus.
6. Disciplinary action may include successful completion of an appropriate rehabilitation program.
ALCOHOL AND OTHER DRUG ASSISTANCE AT SCF

State College of Florida, Manatee – Sarasota values the health and welfare of its students and employees. Alcohol and drug abuse (addiction) are recognized as treatable diseases. The Administration of SCF, as part of its policy to maintain a drug free campus, desires to:

- Help students and employees identify alcohol and other drug misuse/abuse at the earliest possible stage.
- Educate students and employees regarding signs and symptoms of addiction.
- Motivate students and employees to seek intervention from the most qualified resources available on campus and in the community.
- Recognize that students and employees who experience concerns with alcohol and other drug misuse/abuse are entitled to the same respect, confidentiality of intervention services and records handling, as those who experience other medical concerns or conditions which may impair work performance.
- Students or employees who suspect problems with alcohol and other drug misuse/abuse are encouraged to contact the Vice President for Strategic Enrollment Management (if a student) (telephone 752-5301) or the Director of Human Resources (if an employee) (telephone 752-5597). A referral may be made to a trained professional who will assist in the assessment of the problem and provide information regarding appropriate services available on campus and/or within the community.

ALL INFORMATION WILL BE HELD IN THE STRICTEST CONFIDENCE AND WILL NOT BE REVEALED TO ANYONE EXCEPT BY THE INDIVIDUAL’S WRITTEN CONSENT IN ACCORDANCE WITH FEDERAL GUIDELINES OF CONFIDENTIALITY.

THIS SERVICE IS VOLUNTARY AND CONFIDENTIAL
State College of Florida Drug Free Campus Rule

State College of Florida, Manatee - Sarasota will not tolerate the manufacture, distribution, possession, or use/abuse of alcohol or illegal drugs (as defined in 41 U.S.C. § 706), on any SCF campus or at any SCF-sponsored event provided, however, that the President of the College shall be authorized to sanction the legal use of alcohol at State College of Florida, Manatee - Sarasota sponsored or hosted events upon prior application.

State College of Florida, Manatee - Sarasota values the health and safety of its employees and students. Any employee or student found in violation of this rule, after a thorough investigation, will be subject to disciplinary action, which may include, but not be limited to, dismissal from the college as outlined in the SCF Student Handbook and SCF Rules and Procedures Manual. In addition, the college has the responsibility to report, anyone engaging in illegal activity to the appropriate authorities.

Definitions

**Sexual Assault:** is any involuntary sexual act in which a person is threatened, coerced or forced to engage against their will; any sexual touching of a person who has not consented. This includes rape (such as forced vaginal, anal, oral penetration), groping and forced kissing.

**Domestic Violence:** means any assault, aggravated assault, battery, aggravated battery, sexual assault, sexual battery, stalking, aggravated stalking, kidnapping, false imprisonment, or any criminal offense resulting in physical injury or death of one family or household member by another family or household member.

**Dating Violence:** a pattern of behavior where one person uses threats of, or actually uses of, physical, sexual, verbal or emotional abuse to control his or her dating partner. Dating partner means any person, regardless of gender, involved in an intimate relationship with another person primarily characterized by the expectation of affectionate/sexual involvement, whether casual (e.g. “friends with benefits”), serious or long term.

**Stalking:** a person who willfully, maliciously, and repeatedly follows, harasses or cyber stalks another person commits the offense of stalking, a misdemeanor of the first degree.

A person who willfully, maliciously, and repeatedly follows, harasses or cyber stalks another person and makes a credible threat to that person commits the offense of aggravated stalking, a felony in the third degree.

**Consent:** the activity takes place without the use of force or coercion, whether verbal or physical (coercion-act of using some form of pressure or force to have sexual contact with someone who has already refused or is incapable of providing consent), each participant provides clear consent through their words and/or actions, each participant is fully aware of the other participants’ identity and intentions, each participant is clearly able to provide their voluntary consent (both mentally and physically, influence of alcohol or drugs is an issue when considering consent), and there is no verbal or physical resistance by any participant. The provision of consent for one form of sexual activity cannot automatically be taken as consent for any other form of sexual activity, consent must be provided for
each type of activity. In addition, previous relationships or prior consent does not automatically provide consent for future sexual acts, each sexual encounter stands alone.

**Clery Act Crime Definitions**

Federal Bureau of Investigation Uniform Crime Reporting/National Incident Reporting System Crime Definitions are as follows:

**Homicide Offenses:**

1) **Manslaughter by Negligence:** The killing of another person through gross negligence.

2) **Murder and Non-negligent Manslaughter:** The willful (non-negligent) killing of one human being by another.

**Sexual Assault (Sex Offenses):** Any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent. There are four types:

1) **Rape:** the penetration, no matter how slight, of the vagina or anus, with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.

2) **Fondling:** the touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim.

3) **Incest:** is sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

4) **Statutory Rape:** is sexual intercourse with a person who is under the age of statutory consent.

**Robbery:** taking or attempting to take anything of value from the care, custody, or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.

**Aggravated Assault:** An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm. It is not necessary that injury result from an aggravated assault when a gun, knife or other weapon is used that could and probably would result in serious personal injury if the crime were successfully completed.

**Burglary:** The unlawful entry of a structure to commit a felony or a theft. For reporting purposes this definition includes: unlawful entry with intent to commit a larceny or felony; breaking and entering with intent to commit a larceny; housebreaking; safecracking; and all attempts to commit any of the aforementioned.

**Arson:** Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling, public building, motor vehicle or aircraft, personal property of another, etc.
Motor Vehicle Theft: The theft or attempted theft of a motor vehicle. This includes all cases where automobiles are taken by persons not having lawful access even through the vehicles are later abandoned (including joyriding).

Hate Crimes: A reportable hate crime is any of the crimes in the first nine categories listed above and larceny-theft, simple assault, intimidation, and destruction, damage, or vandalism of property or a crime involving bodily injury to any person in which the victim is intentionally targeted because of the actual or perceived race, gender, religion, sexual orientation, ethnicity or disability of the victim. (20 U.S.C. 1092 (f).)

Department of Education Definitions

Weapon Law Violations: Violations of laws or ordinances dealing with weapons offenses, regulatory in nature, such as manufacture, sale or possession of deadly weapons; carrying deadly weapons, concealed or openly; furnishing deadly weapons to minors; aliens possess deadly weapons; and all attempts to commit any of the aforementioned.

Drug Abuse Violations: Violations of federal, state and local laws relating to the unlawful possession, sale, use, growing, manufacturing and making of narcotic drugs. The relevant substances include: opium or cocaine and their derivatives (morphine, heroin, codeine); marijuana; synthetic narcotics (Demerol, methadone); and dangerous non-narcotic drugs (barbiturates, Benzedrine).

Liquor Law Violations: Violations of laws or ordinances prohibiting: the manufacture, sale, transportation, furnishing, possessing of intoxicating liquor; maintaining unlawful drinking places; bootlegging; furnishing liquor to minors.

Drug and Alcohol: The choice to alter one’s state of being through the use of alcohol and other drugs can have grave consequences that include health risk, injury to personal relationships, and the interruption of the pursuit of life goals. State College of Florida values the health and welfare of its students and employees and recognizes alcohol and other drug abuse (addictions) as treatable diseases. Intervention resources are available through the Student Behavioral Intervention Team as well as Human Resources.

Hate Crimes: There were no reported hate crimes for the years 2014, 2015, 2016 on any State College of Florida campus.

Crime Statistics

The following statistics have been compiled from incidents reported to the State College of Florida Department of Public Safety, or the Manatee County or Sarasota County Sheriff’s Offices during the 2014, 2015 and 2016 calendar years. The statistics do not reflect any reports that might have been made to other departments or individuals at the College unless those individuals or departments informed the Department of Public Safety of the incident. Victims or witnesses may report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics. Pastoral or professional counselors, when acting as a counselor, are not required to report any crimes or incidents; the College urges its Consultation, Assessment, Referral & Education Team (CARE Team) members to provide “statistical information” should they become aware of a sexual assault incident.
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### Number of Arrests/Referrals for Select Offenses

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# Crimes Reported by State College of Florida
## Department of Public Safety


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| Number of Arrests/Referrals for Select Offenses |
|-----------------------------------------------|------|------|------|------|------|------|------|------|------|------|------|------|------|
| Offense Type                                  | 2014 | 2015 | 2016 | Venice Campus | Non-Campus Building or Property | Public Property | Total |
| (includes attempts)                           |      |      |      |              |                                 |                 |       |
| Liquor Law Violations                         |      |      |      |              |                                 |                 |       |
| Arrest                                        | 0    | 0    | 0    | 0            | 0                               | 0               | 0     |
| Referral                                      | 0    | 1    | 0    | 0            | 0                               | 0               | 1     |
| Drug Law Violations                           |      |      |      |              |                                 |                 |       |
| Arrest                                        | 0    | 1    | 0    | 0            | 0                               | 0               | 0     |
| Referral                                      | 0    | 0    | 0    | 0            | 0                               | 0               | 0     |
| Weapons Law Violations                        |      |      |      |              |                                 |                 |       |
| Arrest                                        | 0    | 0    | 0    | 0            | 0                               | 0               | 0     |
| Referral                                      | 0    | 0    | 0    | 0            | 0                               | 0               | 0     |