



2026

Annual Security Report Madrid Campus

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Schiller International University - Madrid Campus

2026 ANNUAL SECURITY REPORT

Introduction

This report is provided in compliance with the Jeanne Clery Campus Safety Act. It provides students and employees of Schiller International University ("University" or "Schiller") with information on the University's security arrangements, policies and procedures; programs that provide education on such things as drug and alcohol abuse, awareness of various kinds of sex offenses, and the prevention of crime generally; and procedures the University will take to notify the campus community in the event of an emergency. Its purpose is to provide students and employees with information that will help them make informed decisions relating to their own safety and the safety of others.

Policy for Preparing the Annual Report

This report is prepared by the Campus Director in cooperation with local law enforcement authorities and includes information provided by them as well as by the University's campus security authorities and various other elements of the University. Each year an e-mail notification is made to all enrolled students and employees that provide the website link to access this report. Prospective students and employees are also notified of the report's availability. Hard copies of the report may also be obtained at no cost by contacting Elisa Alvarez Schiller International University Paseo de Recoletos, 35 Madrid 28004 Spain +34 914-482-488. The University is committed to taking the actions necessary to provide a safe and secure working/learning environment for all students and staff. As a member of the campus community, you can feel safe and comfortable knowing that security procedures are in place that represent best practices in the field and are constantly tested and re-evaluated for their effectiveness.

General Safety and Security Policies

Campus Security Personnel & Relationship with Local Law Enforcement

The University does not have a campus security or police department.

While the University does not have any written agreements with local law enforcement agencies, it does maintain a close working relationship with local police.

Contact Information for Local Law Enforcement:

Policia Municipal de Madrid

Pl. de Sta. Maria Soledad Torres Acosta, 2, Centro
28004 Madrid
EMERGENCY: 092 or 112
Non-Emergency: +34 91 532 94 12

Policia National - Madrid
Calle de Leganitos, 19, Centro
28004 Madrid
Emergency: 091 or 112
Non-Emergency: +34 91 322 40 97

Campus Security Authorities

The University has designated certain officials to serve as campus security authorities. Reports of criminal activity can be made to these officials. They in turn will ensure that the crimes are reported for collection as part of the University's annual report of crime statistics. The campus security authorities to whom the University would prefer that crimes be reported are listed below.

- Campus Director at +34 91 448 24 88
- Academic Advisor at +34 91 448 24 88
- Registrar at +34 91 448 24 88

Reporting a Crime or Emergency

The University encourages accurate and prompt reporting of all criminal actions, emergencies, or other incidents occurring on campus, on other property owned by the University, or on nearby public property to the appropriate administrator and appropriate police agencies. Such a report is encouraged when the victim of a crime elects to, or is unable to, make such a report.

Crimes in progress, crimes that have just occurred, and non-criminal emergencies should be reported immediately to one of the following emergency communications centers. All these emergency communication centers are staffed 24 hours a day by trained public safety dispatchers. The dispatchers will assign the appropriate law enforcement, fire and rescue, or medical service to respond. These communications centers operate in Spanish.

- Policia Municipal de Madrid 092
- Policia National 091
- Fire and Rescue 080
- Ambulance (SAMU) 061

Non-Spanish speaking callers should call the European Emergency service at 112 to speak with an English or European language speaking dispatcher for any police, fire and rescue, or medical emergency.

Non-emergency reports, calls, or inquiries should be directed to the appropriate business telephone number(s) for the appropriate agency:

Policia Municipal de Madrid +34 91 532 94 12

Policia National - Madrid +34 91 322 40 97

Fire and Rescue +34 91 354 12 25

Health and Pharmacy +34 90 016 11 61

Whenever possible, the actual victim or witness of the crime should call directly. Firsthand information is always more accurate and complete. If someone merely gives you the information and leaves, please include the name and contact information of the source. Timely and accurate reporting of crimes assists investigations and helps develop timely warnings for the campus.

When calling to report a crime or incident, please be ready to give information needed to dispatch emergency services:

- Name of the caller
- Contact information of the caller
- Description, or nature, of the incident
- Location of the incident
- Time of the incident
- Number of victims or people involved
- The state of the victims

The caller should not hang up until told to do so by the dispatcher. Additional information may be asked for such as:

- Did the suspect have a weapon?
- Where and when was the suspect last seen?
- What did the suspect look like (e.g., gender, race, age, height, weight, hair color/length, clothing, facial hair, tattoos, or scars)?
- Was a vehicle involved?

Students and employees are encouraged to report crimes to the appropriate law enforcement agency. The Campus Director, Director of Student Services, Academic Advisor, and other campus administrators will assist students to report crimes or incidents, to the appropriate policy agency, if requested. Schiller International University policy requires that when a crime or student code of conduct violation occurs on campus it is to be reported as soon as possible, so that an accurate incident report can be filed. Crimes may be reported to the administrators listed above who will ensure that the information will be used for processing timely warnings and preparing the annual statistical disclosure.

Anonymous incident reports can be made through the website: <https://schiller-international-university.personiowhistleblowing.com/> .

Confidential Reporting

The University will protect the confidentiality of victims. Only those with a need to know the identity for purposes of investigating the crime, assisting the victim or disciplining the perpetrator will know the victim's identity.

Pursuant to the University's sexual harassment policy, when an employee who is not a confidential resource becomes aware of alleged misconduct under that policy (including, but not limited to, dating violence, domestic violence, sexual assault, and stalking), the employee is responsible for reporting that information, including the status of the parties if known, to the Title IX Coordinator. A victim of other types of crimes (e.g., aggravated assault, burglary, etc.) who does not want to pursue action within the University disciplinary system or the criminal justice system is nevertheless encouraged to make a confidential report to a campus security authority. Upon the victim's request, a report of the details of the incident can be filed with the University without revealing the victim's identity. Such a confidential report complies with the victim's wishes but still helps the University take appropriate steps to ensure the future safety of the victim and others. With such information, the University can keep an accurate record of the number of incidents involving members of the campus community, determine where a pattern of crime may be developing and alert the community as to any potential danger. These confidential reports are counted and disclosed in the annual crime statistics for the University.

The University does not employ any pastoral or professional counselors and thus does not have procedures for these positions to inform the persons they are counseling of any procedures to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics.

Security of and Access to Campus Facilities

Access to Campus Building and Grounds

The campus is open for normal business Monday through Friday from 8:00 a.m. to 9:30 p.m. Regardless of the time of day or night, no matter where you are on campus, you should be alert and aware of your surroundings and exercise common sense safety precautions. In an emergency - Call 112.

Access to the campus is controlled by a security guard.

All academic buildings are secured during the evenings and weekends. Access to the buildings is only allowed for faculty/staff members and students who are accompanied by faculty/staff members.

Students and employees are asked to be alert and to not circumvent practices and procedures that are meant to preserve their safety and that of others.

- Do not prop doors open or allow strangers into campus buildings that have been secured.

- Do not give access codes to anyone who does not belong to the campus community.

Keys to the offices and classrooms on campus will be issued to employees only as needed and after receiving the proper authorization.

Employee and student identification cards may be used to verify the identity of persons suspected of being in campus facilities without permission.

Security Considerations in the Maintenance of Facilities

The Campus Administration works with facility management to identify maintenance issues on campus that may be safety hazards. Safety checks are completed on a regular basis to identify any risks that may disrupt student life and overall safety. All University faculty and staff are responsible for reporting maintenance and other safety issues to the Campus Director as soon as possible. The Campus Director will then report on the issue to facility management. This will help ensure that all lighting, door, sidewalk, parking lots, and other areas are kept in good working order.

Educational Programs Related to Security Awareness and Prevention of Criminal Activity

The University seeks to enhance the security of its campus and the members of the campus community by periodically presenting educational programs to inform students and employees about campus security procedures and practices, to encourage students and employees to be responsible for their own security and the security of others and to inform them about the prevention of crimes. These programs are discussed below.

The University provides information regarding the University's security procedures and practices at orientation for students and during onboarding for employees. This information is also made available electronically. Among other things, it advises students and employees of the importance of reporting criminal activity, to whom crimes should be reported, being responsible for their own safety and the safety of others, and practices regarding timely warnings and emergency notifications.

Crime prevention programs are also presented each semester by Student Services. In addition, email blasts are periodically sent out to students and employees with crime prevention and other safety tips. Safety considerations and procedures for specific risks, e.g. storms, demonstrations, and pandemics, are addressed to students and employees as they occur.

Monitoring Off Campus Locations of Recognized Student Organizations

The University does not have any officially recognized student organizations with off campus locations and therefore does not monitor or record criminal conduct occurring at such locations.

Disclosure of the Outcome of a Crime of Violence or Non-Forcible Sex Offense

Upon written request, the University will disclose to the alleged victim of a crime of violence (as that term is defined in section 16 of title 18, United States Code), or a non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by the University against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased as a result of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of the paragraph.

The previous paragraph does not apply to victims of dating violence, domestic violence, sexual assault, or stalking because under the Violence Against Women Act both the accused and accuser in these cases are given the results without the need to make a written request.

Drug and Alcohol Policy

The University is committed to creating and maintaining an environment that is free of alcohol abuse. Schiller encourages safe, responsible behavior toward alcohol. All students are personally responsible for their behavior, and all students should consider themselves responsible for the safety of themselves and all fellow students. The possession, use, consumption, manufacture, sale, or distribution of alcohol by anyone under 18 years of age is strictly prohibited and could result in both criminal charges in accordance to Spanish law and university judicial proceedings in accordance with the student code of conduct. The University enforces the Kingdom of Spain's underage drinking laws.

The sale or distribution of alcohol by anyone to a person under 18 years of age is strictly prohibited and could result in both criminal charges in accordance with state and local laws and university judicial proceedings in accordance with the student code of conduct.

The possession, use, or consumption of alcohol by, or its distribution to, a visibly intoxicated person is prohibited and could result in both criminal charges in accordance with state and local laws and university judicial proceedings in accordance with the student code of conduct.

The University upholds Spanish drug laws. The possession, use, consumption, sale, manufacture, or distribution of illegal drugs is prohibited on campus or as any part of the University's activities. Violators of the University's policies or Spanish laws regarding illegal drugs will be subject to disciplinary action and possibly criminal prosecution.

The University complies with the Drug-Free Workplace Act of 1988 and the Drug-Free Schools and Communities Act Amendments of 1989.

The possession, use, manufacture, or distribution of any illegal drug is prohibited on property owned or controlled by the university.

Reporting for work, attendance by a student at any class, or attendance by either a student or employee at any activity of the university under the influence of any controlled substance is prohibited.

Federal Drug Laws (updated 08.3.2026)

Denial of Federal Benefits (21 U.S.C. § 862) A federal drug conviction may result in the loss of federal benefits, including loans, grants, scholarships, contracts, and licenses, although the Department of Education has said it will no longer disqualify students from Title IV aid for a federal or state conviction for possession or sale of a controlled substance.

Forfeiture of Personal Property and Real Estate (21 U.S.C. § 853) Any person convicted of a federal drug offense punishable by more than one year in prison shall forfeit to the United States any personal or real property related to the violation. A warrant of seizure may be issued and property seized at the time an individual is arrested on charges that may result in forfeiture.

Federal Drug Trafficking Penalties (21 U.S.C. § 841) Penalties for federal drug trafficking convictions vary according to the type and quantity of the controlled substance involved in the transaction. Penalties for subsequent convictions are more severe. Federally defined schedules of controlled substances are published at 21 U.S.C. § 812.

In the case of a controlled substance in schedule I or schedule II, GHB (or, “liquid ecstasy”), or flunitrazepam (or, “rohypnol”), a person shall be sentenced to a term of imprisonment of not more than 20 years. If death or serious bodily injury results from the use of a controlled substance which has been illegally distributed, the person convicted on federal charges of distributing the substance faces the possibility of a life sentence and fines ranging up to \$10 million.

In the case of a controlled substance in schedule III, a person shall be sentenced to a term of imprisonment of not more than 10 years, and if death or serious bodily injury results, shall be sentenced to a term of imprisonment of not more than 15 years or a fine not to exceed \$500,000, or both, for a first offense.

For less than 50 kilograms of marijuana, the term of imprisonment shall not be more than five years, and the fine shall not be more than \$250,000, or both, for a first offense.

In the case of a schedule IV substance, the term of imprisonment shall not be more than five years, and the fine shall not be more than \$250,000, or both, for a first offense.

Persons convicted on federal charges of drug trafficking within 1,000 feet of an elementary school, secondary school, college, or university **(21 U.S.C. § 860)** face penalties of prison terms and fines which are twice as high as the regular penalties for the offense, with a mandatory prison sentence of at least one year, unless the offense involves five grams or less of marijuana.

Federal Drug Possession Penalties (21 U.S.C. § 844) Persons convicted on federal charges of possessing any controlled substance face penalties of up to one year in prison, a mandatory

fine of no less than \$1,000, or both. Second, convictions are punishable by not less than 15 days but not more than two years in prison and a minimum fine of \$2,500. Subsequent convictions are punishable by not less than 90 days but not more than three years in prison and a minimum fine of \$5,000.

For the most recent and complete Federal Trafficking Penalties information, visit the website of the U.S. Drug Enforcement Administration at <https://www.campusdrugprevention.gov/content/drug-scheduling-and-penalties>.

Drug and Alcohol Laws of Spain

Alcohol Laws

In Spain, the legal age to purchase, possess, and consume alcoholic beverages is 18 years old. Alcohol may be purchased from licensed establishments, including restaurants, bars, and retail stores. Identification may be required to verify age.

Spanish law and local municipal ordinances commonly prohibit or restrict the consumption of alcohol in public places, including streets, parks, plazas, and other public spaces. Madrid enforces public drinking restrictions, and violations may result in fines and confiscation of alcohol.

Additionally:

- Selling or providing alcohol to persons under 18 years of age is prohibited.
- Driving under the influence of alcohol is a criminal or administrative offense. Spain establishes a blood alcohol concentration (BAC) limit of 0.5 g/L for most drivers, with lower limits applicable to novice and professional drivers. Violations may result in fines, license suspension, and imprisonment.

Drug Laws

Spain distinguishes between private personal consumption and public possession of certain drugs; however, Schiller International University prohibits the unlawful possession, use, manufacture, distribution, or sale of illegal drugs regardless of local legal distinctions.

Cannabis (Marijuana)

Spain does **not** legalize recreational cannabis. While private personal consumption and possession in private spaces are generally not criminal offenses, cannabis possession or consumption in public places is prohibited and may result in substantial administrative fines and confiscation.

Key provisions include:

- Private personal use in a private residence may be tolerated under Spanish law.
- Public possession or consumption may result in administrative fines ranging from approximately €601 to €30,000, depending on the circumstances.
- The sale, trafficking, cultivation for distribution, importation, or exportation of cannabis remains a criminal offense.

Other Controlled Substances

The possession, manufacture, distribution, trafficking, or sale of cocaine, heroin, methamphetamine, MDMA (ecstasy), and other illegal drugs is prohibited and may result in severe criminal penalties, including imprisonment and significant fines.

Prescription Medications

Prescription medications containing controlled substances must be legally prescribed and possessed in accordance with Spanish law. Individuals traveling with prescription medications should retain prescriptions and supporting documentation.

University Expectations

Students and employees participating in Schiller International University programs in Madrid are expected to comply with all Spanish national laws, regional regulations, and local ordinances regarding alcohol and controlled substances, as well as all University policies.

Any student or employee who violates Spanish law or University policy related to alcohol or drugs may be subject to:

- Criminal or administrative sanctions imposed by Spanish authorities;
- University disciplinary action;
- Suspension or expulsion (students); or
- Termination of employment (employees).

Drug and Alcohol Abuse Prevention Program (DAAPP)

In compliance with the Drug-Free Schools and Communities Act of 1989 (DFSCA) and the Drug-Free Workplace Act, Schiller International University is committed to maintaining a learning and working environment that is free from unlawful use, possession, distribution, manufacture, or sale of alcohol and controlled substances. This notification applies to all students, faculty, staff, contractors, and visitors participating in university-sponsored activities, whether on campus, online, or at university-sponsored events.

This section serves as Schiller International University's Drug and Alcohol Abuse Prevention Program (DAAPP) and is distributed annually to all students and employees.

Standards of Conduct

Schiller International University prohibits:

- The unlawful possession, use, manufacture, distribution, sale, or dispensing of illegal drugs or controlled substances on university property, at university-sponsored activities, during university travel, or while conducting University business.
- The possession, consumption, distribution, or sale of alcohol in violation of applicable laws and regulations.
- Reporting to class, work, internships, clinical placements, or University activities while impaired by alcohol, illegal drugs, or the misuse of prescription medications.
- The misuse of prescription medications, including the use of medications without a valid prescription or in a manner inconsistent with prescribed directions.

Students and employees are expected to comply with all applicable federal, state, local, and international laws governing alcohol and controlled substances in the jurisdictions where they study, work, or participate in university activities.

Disciplinary Sanctions

Violations of the University's alcohol and drug policies may result in disciplinary action, including but not limited to:

Students

- Verbal or written warning
- Educational interventions or mandatory counseling
- Disciplinary probation
- Restriction from University activities
- Suspension
- Expulsion from the University

Employees

- Verbal or written reprimand
- Mandatory participation in counseling or rehabilitation programs
- Suspension from employment
- Termination of employment

The University reserves the right to refer violations to law enforcement authorities when appropriate.

Legal Sanctions

Students and employees who unlawfully possess, use, manufacture, distribute, or sell controlled substances or alcohol may be subject to criminal penalties under federal, state, local, or international laws. Depending on the nature and severity of the offense, sanctions may include:

- Criminal fines
- Imprisonment
- Probation
- Community service
- Loss of driving privileges
- Seizure of property
- Permanent criminal records
- Enhanced penalties for distribution to minors or within designated drug-free zones

Individuals studying or working at Schiller's international locations are also subject to the laws of the host country, which may impose additional civil or criminal penalties.

Health Risks Associated with Alcohol and Drug Abuse

The abuse of alcohol and the use of illegal drugs present significant health and safety risks, including:

Alcohol Abuse

- Impaired judgment and decision-making
- Reduced academic and work performance
- Injuries due to accidents or falls
- Alcohol poisoning
- Liver disease and cardiovascular problems
- Depression, anxiety, and other mental health disorders
- Dependence and addiction
- Increased risk of violent behavior and unsafe activities

Illicit Drug Use

- Impaired memory, concentration, and learning
- Psychological dependence and addiction
- Anxiety, depression, paranoia, and psychosis
- Heart, lung, liver, and neurological damage
- Increased risk of infectious diseases when drugs are injected
- Accidental overdose and death
- Academic failure and reduced occupational performance

The misuse of prescription medications, including opioids, stimulants, and sedatives, may result in serious health consequences, overdose, dependence, and death.

Counseling, Treatment, Rehabilitation, and Re-Entry Programs

Schiller International University encourages individuals experiencing substance abuse issues to seek assistance promptly.

Available resources may include:

Students

Students may access:

- Academic and student support services
- Referrals to community-based counseling providers
- Mental health and wellness resources
- Local treatment and rehabilitation programs in the jurisdiction where the student is located

Employees

Employees may access:

- The University's Employee Assistance Program (EAP), where available
- Mental health counseling and referral services
- Community substance abuse treatment providers

- Inpatient and outpatient rehabilitation programs
- Local and national crisis intervention services

Individuals who voluntarily seek assistance for substance abuse problems before violating University policy will be encouraged to utilize available support resources. Seeking help will not, by itself, result in disciplinary action, although the University reserves the right to address conduct violations that have already occurred.

Prevention and Education Activities

Schiller International University promotes a healthy and drug-free learning environment through ongoing prevention and awareness initiatives, which may include:

- Annual distribution of the Drug and Alcohol Abuse Prevention Program notification;
- Student and employee orientation programs addressing drug and alcohol awareness;
- Educational materials regarding substance abuse prevention and responsible decision-making;
- Mental health and wellness programming;
- Training for faculty, staff, and student services personnel to recognize and appropriately respond to substance abuse concerns;
- Referrals to counseling, treatment, and support resources.

Biennial Review

In accordance with the Drug-Free Schools and Communities Act, Schiller International University conducts a biennial review of its Drug and Alcohol Abuse Prevention Program to:

1. Determine the effectiveness of the program and implement necessary changes.
2. Ensure disciplinary sanctions are consistently enforced.
3. Evaluate trends, educational initiatives, and available support services.
4. Assess compliance with all applicable federal requirements.

Questions regarding this Drug and Alcohol Abuse Prevention Program may be directed to the Office of Student Services or the Office of Human Resources.

Annual Notification Statement

Schiller International University annually distributes this Drug and Alcohol Abuse Prevention Program notice to all students and employees as required by the Drug-Free Schools and Communities Act of 1989. The University is committed to fostering a safe, healthy, and productive educational environment and encourages community members to seek assistance whenever concerns related to alcohol or substance abuse arise.

[Schiller International University Catalog 2026-2027](#)

Policies, Procedures, and Programs Related to Dating Violence, Domestic Violence, Sexual Assault, and Stalking

Consistent with applicable laws, the University prohibits dating violence, domestic violence, sexual assault, and stalking. The University's policy used to address complaints of this nature, as well as the procedures for filing, investigating and resolving complaints, may be found at:

- Student Code of Conduct Policy:
<https://schillerumbracoprod.blob.core.windows.net/schiller-public-asests/Library/Web%20Documentation/00.%20Catalog/Catalog%20-%20Schiller%20International%20University.pdf>
- Statement on Harassment:
<https://schillerumbracoprod.blob.core.windows.net/schiller-public-asests/Library/Web%20Documentation/00.%20Catalog/Catalog%20-%20Schiller%20International%20University.pdf>

TITLE IX COMPLIANCE

TITLE IX POLICY STATEMENT

Title IX of the Education Amendments of 1972 ("Title IX") protects people from discrimination based on sex in education programs or activities which receive Federal financial assistance. Title IX states:

No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.

Schiller International University not only complies with the letter of Title IX's requirements but also endorses the law's intent and spirit. The University is committed to compliance in all areas addressed by Title IX, including access to higher education, career education, math and science, standardized testing, athletics, education for pregnant and parenting students, learning environment, and technology, as well as sexual harassment.

The purpose of this policy is to ensure that the University's policies are applied and interpreted in ways consistent with Title IX and other applicable law.

It is the policy of the University to provide educational, preventative and training programs regarding sexual or gender-based harassment; to encourage reporting of incidents; to prevent incidents of sexual and gender-based harassment from denying or limiting an individual's ability to participate in or benefit from the University's programs; to make available timely services for those who have been affected by discrimination; and to provide prompt and equitable methods of investigation and resolution to stop discrimination, remedy any harm, and prevent its recurrence. A copy of the primary prevention and awareness program is available at <https://www.schiller.edu/campus-safety-reports-and-emergency-preparedness-plans/>. Violations of this Policy may result in the imposition of sanctions up to, and including, termination, dismissal, or expulsion, as determined by the appropriate officials at the University.

Discrimination

Schiller International University prohibits discrimination and harassment based on race, color, creed, religion, sex, gender, national origin, citizenship, ethnicity, marital status, age,

disability, sexual orientation, gender identity and gender expression, genetic information, veteran status, or any other status protected by applicable law to the extent prohibited by law.

The University Title IX officers

The University appoints Title IX Officers. The University's Title IX Officers are:

- Dr. Heather Nickel, Dean of Institutional Effectiveness
- Dr. Matthew Andrews, Campus Director

76 rue de la Demi Lune, 92800 Puteaux France +33 (0)1 45 38 74 55

The following sections of this report discuss the University's educational programs to promote the awareness of dating violence, domestic violence, sexual assault and stalking; provides information concerning procedures students and employees should follow and the services available in the event they do become a victim of one of these offenses and advises students and employees of the disciplinary procedures that will be followed after an allegation that one of these offenses has occurred.

Primary Prevention and Awareness Program:

The University conducts a Primary Prevention and Awareness Program (PPAP) for all incoming students and new employees. The PPAP advises campus community members that the University prohibits the offenses of dating violence, domestic violence, sexual assault and stalking. They are also informed of the topics discussed below, including relevant definitions, risk reduction, and bystander intervention.

Crime Definitions

Crime Type (Florida Statutes)	Definitions
Dating Violence (Fla. Stat. § 784.046)	• "Dating violence" means violence between individuals who have or have had a continuing and significant relationship of a romantic or intimate nature. The existence of such a relationship shall be determined based on the consideration of the following factors: (1) A dating relationship must have existed within the past 6 months; (2) The nature of the relationship must have been characterized by the expectation of affection or sexual involvement between the parties; and (3) The frequency and type of interaction between the persons involved in the relationship must have included that the persons have been involved over time and on a continuous basis during the course of the relationship. The term does not include violence in a casual acquaintanceship or violence between individuals who only have engaged in ordinary fraternization in a business or social context. • "Violence" means any assault, aggravated assault, battery, aggravated battery, sexual assault, sexual battery, stalking, aggravated stalking, kidnapping, or false imprisonment, or any

Crime Type (Florida Statutes)	Definitions
	criminal offense resulting in physical injury or death, by a person against any other person.
Domestic Violence (Fla. Stat. § 741.28)	• “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. • “Family or household member” means spouses, former spouses, persons related by blood or marriage, persons who are presently residing together as if a family or who have resided together in the past as if a family, and persons who are parents of a child in common regardless of whether they have been married. With the exception of persons who have a child in common, the family or household members must be currently residing or have in the past resided together in the same single dwelling unit.
Stalking (Fla. Stat. § 784.048)	• A person who willfully, maliciously, and repeatedly follows, harasses, or cyberstalks another person commits the offense of stalking, a misdemeanor of the first degree. • A person who willfully, maliciously, and repeatedly follows, harasses, or cyberstalks another person and makes a credible threat to that person commits the offense of aggravated stalking, a felony of the third degree. • A person who, after an injunction for protection against repeat violence, sexual violence, or dating violence, or an injunction for protection against domestic violence, or after any other court-imposed prohibition of conduct toward the subject person or that person's property, knowingly, willfully, maliciously, and repeatedly follows, harasses, or cyberstalks another person commits the offense of aggravated stalking, a felony of the third degree. • A person who willfully, maliciously, and repeatedly follows, harasses, or cyberstalks a child under 16 years of age commits the offense of aggravated stalking. • The following definitions apply to the crimes of stalking outlined above: ○ “Harass” means to engage in a course of conduct directed at a specific person which causes substantial emotional distress to that person and serves no legitimate purpose. ○ “Course of conduct” means a pattern of conduct composed of a series of acts over a period of time, however short, which evidences a continuity of purpose.

Crime Type (Florida Statutes)	Definitions
	The term does not include constitutionally protected activity such as picketing or other organized protests. ○ “Credible threat” means a verbal or nonverbal threat, or a combination of the two, including threats delivered by electronic communication or implied by a pattern of conduct, which places the person who is the target of the threat in reasonable fear for his or her safety or the safety of his or her family members or individuals closely associated with the person, and which is made with the apparent ability to carry out the threat to cause such harm. It is not necessary to prove that the person making the threat had the intent to actually carry out the threat. The present incarceration of the person making the threat is not a bar to prosecution under this section. ○ “Cyberstalk” means: 1) To engage in a course of conduct to communicate, or to cause to be communicated, directly or indirectly, words, images, or language by or through the use of electronic mail or electronic communication, directed at or pertaining to a specific person; or 2) To access, or attempt to access, the online accounts or Internet-connected home electronic systems of another person without that person's permission, causing substantial emotional distress to that person and serving no legitimate purpose.
Sexual Assault	The institution has determined, based on good-faith research that Florida law does not define the term sexual assault. Such offenses are generally prosecuted under the state’s sexual battery provisions (Fla. Stat. § 794.011 <i>et. seq.</i>).
Rape, Fondling, Incest, Statutory Rape	For purposes of the Clery Act, the term “sexual assault” includes the offenses of rape, fondling, incest, and statutory rape. These definitions under Florida law are as follows: • Rape: The institution has determined, based on good-faith research, that Florida law does not define the term rape. • Fondling: The institution has determined, based on good-faith research, that Florida law does not define the term fondling. • Incest (Fla. Stat. § 826.04): Whoever knowingly marries or has sexual intercourse with a person to whom he or she is related by lineal consanguinity, or a brother, sister, uncle, aunt, nephew, or niece, commits incest, which constitutes a felony of the third degree. “Sexual intercourse” is the penetration of the female sex organ by the male sex organ, however slight; emission of semen is not required.

Crime Type (Florida Statutes)	Definitions
	Statutory Rape: The institution has determined, based on good-faith research, that Florida law does not define the term statutory rape. Such offenses are generally prosecuted under the state's sexual battery provisions (Fla. Stat. § 794.011 <i>et. seq.</i>).
Other "sexual assault" crimes	Other crimes under Florida law that may be classified as a "sexual assault" include the following: - Sexual Battery (Fla. Stat. § 794.011): "Sexual battery" means oral, anal, or female genital penetration by, or union with, the sexual organ of another or the anal or female genital penetration of another by any other object; however, sexual battery does not include an act done for a bona fide medical purpose. [note: the statute provides different degrees of sexual battery based on a variety of factors, including the ages of the parties involved and whether the victim was physically incapacitated]. - For purposes of this section "female genitals" includes the labia minora, labia majora, clitoris, vulva, hymen, and vagina. - Lewd or Lascivious Battery (Fla. Stat. § 800.04): A person commits lewd or lascivious battery by (1) engaging in sexual activity with a person 12 years of age or older but less than 16 years of age or (2) encouraging, forcing, or enticing any person less than 16 years of age to engage in sadomasochistic abuse, sexual bestiality, prostitution, or any other act involving sexual activity. - Lewd or Lascivious Exhibition (Fla. Stat. § 800.04): A person who in the presence of a victim who is less than 16 years of age (1) intentionally masturbates; (2) intentionally exposes the genitals in a lewd or lascivious manner; or (3) intentionally commits any other sexual act that does not involve actual physical or sexual contact with the victim, including, but not limited to, sadomasochistic abuse, sexual bestiality, or the simulation of any act involving sexual activity. - Lewd or Lascivious Conduct (Fla. Stat. § 800.04): A person who (1) intentionally touches a person under 16 years of age in a lewd or lascivious manner or (2) solicits a person under 16 years of age to commit a lewd or lascivious act commits lewd or lascivious conduct. - Lewd or Lascivious Molestation (Fla. Stat. § 800.04): A person who intentionally touches in a lewd or lascivious manner the breasts, genitals, genital area, or buttocks, or the clothing covering them, of a person less than 16 years of age, or forces or entices a person under 16 years of age to so touch the perpetrator, commits lewd or lascivious molestation.

Crime Type (Florida Statutes)	Definitions
	• Unlawful Sexual Activity With Certain Minors (Fla. Stat. § 794.05): A person 24 years of age or older who engages in sexual activity with a person 16 or 17 years of age commits a felony of the second degree. ○ As used in this section, the term: (a) “Female genitals” includes the labia minora, labia majora, clitoris, vulva, hymen, and vagina. (b) “Sexual activity” means oral, anal, or female genital penetration by, or union with, the sexual organ of another or the anal or female genital penetration of another by any other object; however, sexual activity does not include an act done for a bona fide medical purpose. • Under Fla. Stat. 784.046, “Sexual Violence” means any one incident of: 1) Sexual battery, as defined in Chapter 794; 2) A lewd or lascivious act, as defined in chapter 800, committed upon or in the presence of a person younger than 16 years of age; 3) Luring or enticing a child, as described in chapter 787; 4) Sexual performance by a child, as described in chapter 827; or 5) Any other forcible felony wherein a sexual act is committed or attempted, regardless of whether criminal charges based on the incident were filed, reduced, or dismissed by the state attorney.
Consent (as it relates to sexual activity) (Fla. Stat. § 794.011(1)(a))	“Consent” means intelligent, knowing, and voluntary consent and does not include coerced submission. “Consent” shall not be deemed or construed to mean the failure by the alleged victim to offer physical resistance to the offender.

University Definition of Consent

The University uses the following definition of consent in its sexual harassment policy for the purpose of determining whether sexual violence (including sexual assault) has occurred:

Statutory Definition of Consent

“Consent” means intelligent, knowing, and voluntary consent and does not include coerced submission. “Consent” shall not be deemed or construed to mean the failure by the alleged victim to offer physical resistance to the offender.

The Age of Consent in Spain is 16 years old. The age of consent is the minimum age at which an individual is considered old enough to consent to participation in sexual activity. Individuals aged 15 or younger in Spain are not legally able to consent to sexual activity, and such activity may result in prosecution for statutory rape or the equivalent local law.

Risk Reduction

If you find yourself in an uncomfortable sexual situation, these suggestions may help you reduce your risk:

- Make your limits known before going too far.
- You can withdraw consent to sexual activity at any time. Do not be afraid to tell a sexual aggressor “NO” clearly and loudly.
- Try to remove yourself from the physical presence of a sexual aggressor. Be direct as possible about wanting to leave the environment.
- Grab someone nearby and ask them for help.
- Be responsible for your alcohol and/or drug use. Alcohol and drugs can lower your sexual inhibitions and may make you vulnerable to someone who views an intoxicated/high person as a sexual opportunity.
- Attend parties with friends you trust. Watch out for your friends and ask that they watch out for you.
- Be aware of someone trying to slip you an incapacitating “rape drug” like Rohypnol or GHB.

If you find yourself in the position of being the initiator of sexual behavior, these suggestions may help you to reduce your risk of being accused of sexual assault or another sexual crime:

- Remember that you owe sexual respect to the other person.
- Don’t make assumptions about the other person’s consent or about how far they are willing to go.
- Remember that consent to one form of sexual activity does not necessarily imply consent to another form of sexual behavior.
- If your partner expresses a withdrawal of consent, stop immediately.
- Clearly communicate your sexual intentions so that the other person has a chance to clearly tell you, their intentions.
- Consider “mixed messages” a clear sign that the other person is uncomfortable with the situation and may not be ready to progress sexually.
- Don’t take advantage of someone who is really drunk or on drugs, even if they knowingly and intentionally put themselves in that state. Further, don’t be afraid to step in if you see someone else trying to take advantage of a nearly incapacitated person.
- Be aware of the signs of incapacitation, such as slurred speech, bloodshot eyes, vomiting, unusual behavior, passing out, staggering, etc.

It is also important to be aware of the warning signs of an abusive person. Some examples include:

- Past abuse
- Threats of violence or abuse
- Breaking objects
- Using force during an argument
- Jealousy
- Controlling behavior

- Quick involvement
- Unrealistic expectations
- Isolation
- Blaming others for problems
- Hypersensitivity
- Cruelty to animals or children
- "Playful" use of force during sex
- Jekyll-and-Hyde personality

Bystander Intervention

In addition to reporting incidents to appropriate authorities, below are some ways in which individuals can take safe and positive steps to prevent harm and intervene when there is a risk of dating violence, domestic violence, sexual assault, or stalking against another person.

- Look out for those around you.
- Realize that it is important to intervene to help others.
- Treat everyone respectfully. Do not be hostile or an antagonist.
- Be confident when intervening.
- Recruit help from others if necessary.
- Be honest and direct.
- Keep yourself safe.
- If things get out of hand, don't hesitate to contact the police.

Other Information Covered by the PPAP

The PPAP also provides information on possible sanctions and protective measures that may be imposed following a determination that an offense of dating violence, domestic violence, sexual assault, or stalking has occurred, an explanation of the disciplinary procedures that will be followed when one of these offenses is alleged, the rights of the parties in such a proceeding, available resources, and other pertinent information. Much of this information is set forth in the upcoming sections of this security report.

Ongoing Prevention and Awareness Campaign:

The University also conducts an Ongoing Prevention and Awareness Campaign (OPAC) aimed at all students and employees. This campaign covers the same material as provided in the PPAP but is intended to increase the understanding of students and employees on these topics and to improve their skills for addressing the offenses of dating violence, domestic violence, sexual assault and stalking.

PPAP and OPAC Programming Methods:

The PPAP and OPAC are carried out in a variety of ways, using a range of strategies, and, as appropriate, targeting specific audiences throughout the University. Methods include, but are not limited to presentations, online training modules, distribution of written materials,

periodic email blasts, and guest speakers. A summary of this programming is provided below.

- New students receive education on the prevention of dating violence, domestic violence, sexual assault, and stalking through a presentation by the Office of Student Services during orientation. All new employees are required to complete an online training module on these topics upon hire and are required to retake the online training each year.
- As part of its ongoing campaign, the University uses a variety of strategies, such as in-person presentations by sexual assault organizations, emails blasts with pertinent information, portal announcements, etc. While programming occurs throughout the year, the University also offers educational sessions and literature in coordination with nationally recognized observances such as Sexual Assault Awareness Month and Domestic Violence Awareness Month.

Procedures to Follow if You are a Victim of Dating Violence, Domestic Violence, Sexual Assault, or Stalking:

If you are a victim of dating violence, domestic violence, sexual assault, or stalking, go to a safe place and call 112 or the Campus Director at +34 91 448 24 88. You may also contact the University's Title IX Coordinator at +1 (813) 323-3353.

Victims will be notified in writing of the procedures to follow, including:

1. To whom and how the alleged offense should be reported (contact the Title IX Coordinator or refer to the other resources listed in this report).
2. The importance of preserving evidence that may be necessary to prove the offense in a criminal proceeding or disciplinary action or to obtain a protective order.
3. The victim's options regarding notification to law enforcement, which are: (a) the option to notify either on-campus or local police; (b) the option to be assisted by campus security authorities in notifying law enforcement if the victim so chooses (the institution is obligated to comply with such a request if it is made); and (c) the option to decline to notify such authorities.
4. Where applicable, the rights of victims and the institution's responsibilities regarding orders of protection, no-contact orders, restraining orders, or similar lawful orders issued by a criminal, civil, or tribal court.

Preservation of Evidence & Forensic Examinations

Victims of physical assault are advised to not remove clothing items worn during or following an assault, as they frequently contain valuable fiber, hair, and fluid evidence. Don't bathe or wash or otherwise clean the environment in which the assault occurred. You can obtain a forensic examination at:

Hospital de La Princesa Address: Calle Diego de Leon 62 28006 Madrid Hours: Open 24 hours Telephone: +34 915 20 22 00.

Completing a forensic examination does not require you to file a police report, but having a forensic examination will help preserve evidence in case you decide at a later date to file a police report.

Victims are also advised to retain evidence in electronic formats (e.g., text messages, emails, photos, social media posts, screenshots, etc.). Such evidence is valuable in all situations, and it may be the only type of evidence available in instances of stalking.

Security/Law Enforcement & How to Make a Police Report

- If you are a victim, you should immediately call 016 or 112. The operators will be able to talk to you in Spanish, English or French and will give you practical and psychological assistance. The service is totally free and confidential and will not appear on telephone bills. For emergencies you should call The Guardia Civil 062 or Police 091. If the Guardia Civil or the Police are intervening, they will immediately take measures to distance or arrest the aggressor.
- Comisaría de Policía - Chamartin District Address: Av. de Pío XII, 48, 28016 Madrid
Open 24 hours a day Telephone: +34 913 22 79 10
- If you have been assaulted by a member of the University community or on campus by a non-community member, you may file a complaint by contacting one of the following people directly: • Campus Director at +34 91 448 2488 ext. 3112 • Title IX coordinator at +1 (813) 323-3353 • Off-campus emergency services can be reached calling 016 or 112. These resource personnel can inform you of your options and provide assistance in pursuing them. You may contact them in person or by telephone. You should be aware that University personnel may likely be required to inform the police of any sexual assaults of which they become aware. Remember, it is important to preserve evidence that may be needed as evidence to prove a sexual assault.

Information about Legal Protection Orders

For legal assistance, see this link: <https://web.icam.es/ciudadanos/asistencia-juridica-gratuita/>.

When a protection order is granted, it is enforceable statewide. If you have obtained a protection order and need it to be enforced in your area, you should contact the local police department.

The University will also enforce any temporary restraining order or other no contact order against the alleged perpetrator from a criminal, civil, or tribal court. Any student or employee who has a protection order or no contact order should notify the Title IX Coordinator and provide a copy of the restraining order so that it may be kept on file with the institution and can be enforced on campus, if necessary. Upon learning of any orders, the University will take all reasonable and legal action to implement the order.

The University does not issue legal orders of protection. However, as a matter of institutional policy, the University may impose a no-contact order between individuals in appropriate circumstances. The University may also issue a “no trespass warning” if information available leads to a reasonable conclusion that an individual is likely to cause harm to any member of the campus community. A person found to be in violation of a No Trespass Warning may be arrested and criminally charged.

Available Victim Services:

Victims will be provided with written notification about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available to them, both within the University and in the surrounding community. Those services include:

University Resources

A trained counselor can assist you during this time of need, advise you of your options and provide you with support in pursuing them. For referral to a counselor, contact Campus Director, Student Advisor, or Title IX coordinator.

Schiller International University provides advising for Financial Aid, Academics, and Career Services on campus. Assistance is provided through the Admissions team to assist student in obtaining student visas and assistance with travel plans and temporary housing arrangements. Information is made available for assistance with Mental Health counselling.

Victim Advocates provide crisis intervention, criminal justice information and court accompaniment, assistance with filing crimes compensation, social service referrals and personal safety planning including assistance filing for injunctions for protections to victims and witnesses of crime. For more information about Victim Services, contact S.A.V.G at +34 900 222 100 or 24 Hour Crisis Centers at +34 900 869 947 or +34 900 599 316.

Student Financial Aid – Sometimes a victim of a crime may feel the need to take a leave of absence from school. If a student is considering a leave of absence based on the circumstances of a complaint, he/she should understand there may be financial aid implications in taking such leave. This should be discussed with financial aid personnel, and the Title IX Coordinator can assist in facilitating this conversation if desired. The University’s financial aid website can be found at: <https://schiller.edu/scholarships-and-financial-aid/financial-aid>

Spanish & Local Resources

Emergency Assistance

- **Emergency Services (Police, Fire, Ambulance):** 112 available throughout Spain for immediate emergencies.
- **National Police:** 091.

- **National Domestic Violence and Gender Violence Hotline:** 016 (free, confidential, 24/7, does not appear on phone bills). Services are available in multiple languages, including English.

Victim Advocacy and Support Services

016 Gender Violence Information and Assistance Service

Spain's national hotline provides information, legal advice, crisis counseling, and referrals for victims of domestic violence, dating violence, sexual violence, stalking, human trafficking, and other forms of gender-based violence. Services are confidential and available 24 hours a day.

- Phone: 016
- WhatsApp: 600 000 016
- Online Chat: Available through the Government Delegation against Gender Violence website.

Servicio de Atención a Mujeres Víctimas de Violencia de Género (S.A.V.G. 24 Horas)

The City of Madrid's 24-hour assistance service for women experiencing gender-based violence. Provides crisis intervention, counseling, advocacy, emergency assistance, and referrals.

- 24-Hour Hotline: 900 222 100

Centro de Crisis contra la Violencia Sexual

Madrid's Sexual Violence Crisis Center provides support, counseling, crisis intervention, and referrals for survivors of sexual assault and sexual violence.

- 24-Hour Helpline: 900 869 947

Federation of Associations for Assistance to Victims of Sexual Violence

Provides support, advocacy, and referrals for victims of sexual violence throughout Spain.

- Helpline: 636 858 923

Local Hospitals and Medical Services

Victims of sexual assault are encouraged to seek immediate medical attention. Hospitals can provide emergency treatment, forensic examinations, sexually transmitted infection testing, pregnancy prevention services, and referrals for counseling and victim services.

Hospital Universitario La Paz

One of Madrid's major university hospitals with comprehensive emergency services.

- Address: Paseo de la Castellana, 261, Madrid
- Phone: +34 917 27 70 00

Hospital General Universitario Gregorio Marañón

Major public hospital offering emergency and trauma services.

- Address: Calle Doctor Esquerdo, 46, Madrid
- Phone: +34 915 86 80 00

Hospital Universitario 12 de Octubre

Large tertiary-care hospital with 24-hour emergency services.

- Address: Avenida de Córdoba, s/n, Madrid
- Phone: +34 913 90 80 00

Hospital Universitario Clínico San Carlos

Comprehensive public hospital serving Madrid residents and visitors.

- Address: Calle del Profesor Martín Lagos, Madrid
- Phone: +34 913 30 30 00

Mental Health and Counseling Resources

S.A.V.G. 24 Horas

Provides crisis counseling, trauma-informed support, psychological services, and referrals for victims of domestic violence and related crimes.

- Phone: 900 222 100

Centro de Crisis contra la Violencia Sexual

Offers psychological support and trauma counseling specifically for survivors of sexual violence.

- Phone: 900 869 947

Public Mental Health Services

The public health system of the Community of Madrid provides mental health services through hospitals, community mental health centers, psychiatrists, psychologists, and crisis intervention programs. Students may be referred through local healthcare providers or emergency departments.

English-Speaking Counseling Services

Students seeking counseling in English may obtain referrals through:

- Schiller International University Student Affairs Office
- International clinics and hospitals in Madrid
- Private psychologists and mental health practitioners serving the expatriate community

Legal and Victim Support Resources

Victims may seek:

- Protective orders through Spanish courts.
- Assistance from local police.
- Emergency shelter and housing resources through municipal social services.
- Free legal aid and psychological support services available to victims of gender violence.

Accommodations and Protective Measures:

The University will provide written notification to victims about options for and available assistance in, changing academic, living, transportation, and working situations or protective measures. If victims request these accommodations or protective measures and they are reasonably available the University is obligated to provide them, regardless of whether the victim chooses to report the crime to campus security or local law enforcement.

A victim may also request that the alleged respondent's campus privileges be temporarily suspended (temporary suspension) until the investigation and judicial process are complete. This request can be filed with the Campus Director and if reasonable, action will be taken promptly. The Campus Director is responsible for overseeing these measures and they are applied appropriately to ensure the safety and well-being of the victim.

Requests for accommodations or protective measures should be made to the Campus Director who is responsible for deciding what, if any, accommodations or protective measures will be implemented.

Campus Director +34 91 448 24 88

When determining the reasonableness of such a request, the University may consider, among other factors, the following:

- The specific need expressed by the complainant.
- The age of the students involved.
- The severity or pervasiveness of the allegations
- Any continuing effects on the complainant
- Whether the complainant and alleged perpetrator share the same class or job location.

- Whether other judicial measures have been taken to protect the complainant (e.g., civil protection orders).

The University will maintain as confidential any accommodations or protective measures provided by a victim to the extent that maintaining confidentiality would not impair the University's ability to provide them. However, there may be times when certain information must be disclosed to a third party in order to implement accommodation or protective measure. Such decisions will be made by the University in light of the surrounding circumstances, and disclosures of this nature will be limited so that only the information necessary to implement the accommodation or protective measure is provided. In the event it is necessary to disclose information about a victim in order to provide accommodation or protective order, the University will inform the victim of that necessity prior to the disclosure, including which information will be shared, with whom it will be shared and why.

Procedures for Disciplinary Action:

REPORTING PROCEDURES

A student who has been sexually assaulted has several options for reporting the incident and receiving information and support: Report the Assault on Campus. If you have been assaulted by a member of the University community or on campus by a non-community member, you may file a complaint by contacting one of the following directly:

- Emergency Assistance - Call 112
- Campus Director +34 91 448 24 88
- Title IX Coordinator +1 (813) 323-3353

These University personnel can inform you of your options and provide assistance in pursuing them. You may contact them in person or by telephone. You should be aware that University personnel may likely be required to inform the police of any sexual assaults of which they become aware. Remember, it is important to preserve evidence that may be needed as evidence to prove a sexual assault.

DISCIPLINARY PROCEEDINGS AND POSSIBLE SANCTIONS

Reports of sexual assaults, domestic violence, dating violence, and stalking are taken seriously by the university. Investigations and judicial proceedings are conducted in a prompt, fair, and impartial manner. Any student who is charged with sexual assaults, domestic violence, dating violence, or stalking may be subject to disciplinary action by the University in accordance with campus disciplinary procedures.

Any member of the University community may report concerns or alleged misconduct. Reports may be submitted:

- In person to SIU administrators.
- By email.
- Through SIUs confidential reporting system.

The University prohibits retaliation against individuals who report misconduct or participate in conduct processes.

Conduct Review Process

The conduct review process is designed to ensure that all allegations of student misconduct are addressed in a manner that is fair, impartial, timely, and respectful of the rights of all parties involved. The process emphasizes due process, consistency, and educational outcomes, while also prioritizing the safety and well-being of the University community. University officials involved in the conduct process are trained to carry out their responsibilities objectively and in accordance with this Code.

The procedures outlined below apply to most alleged violations of the Student Code of Conduct. Certain types of misconduct (such as sexual misconduct or academic integrity violations) may also be governed by separate, related policies and procedures, which may supplement or supersede portions of this process as required by law or regulation.

1. Initial Assessment

Upon receipt of a report, the Campus Director or a designated University official will conduct an initial assessment to determine whether the alleged conduct falls within the scope of this Code and whether sufficient information exists to proceed.

As part of the initial assessment, the University may:

- Determine the appropriate policy or policies under which the allegation should be reviewed.
- Assess whether interim measures are necessary to protect individuals or the community.
- Refer the matter to another University office or process when appropriate.

Interim measures are not disciplinary in nature and may include temporary restrictions, adjustments to academic arrangements, or changes to access to facilities while the matter is under review.

2. Investigation

If the matter proceeds, an investigation will be conducted promptly and impartially by the Campus Director or its designee. The investigation process may include:

- Interviews with the complainant, respondent, and relevant witnesses.
- Review of documents, electronic records, and other relevant evidence.
- Collection of written statements when appropriate.

Investigations are typically completed within fifteen (15) business days of the report being received, although extensions may be granted in cases involving complexity, unavailability of parties, or other extenuating circumstances. All parties will be informed of significant delays.

3. Notice and Hearing

When an investigation indicates that a hearing is appropriate, the respondent will receive written notice via official University email at least five (5) business days prior to the hearing. The notice will include:

- A summary of the alleged policy violations.
- The date, time, and location (or format) of the hearing.
- Information regarding the hearing procedures and available support resources.

Hearings are conducted by the Disciplinary Committee and may take place in person or virtually. Both the complainant and the respondent will have the opportunity to present information, identify witnesses, and respond to evidence. The Campus Director will assemble the Disciplinary Committee made up of at least three (3) people who have no previous understanding of the alleged conduct violation.

Students may be accompanied by a support person of their choosing. The support person serves as an observer only and may not participate directly in the proceedings.

4. Determination and Standard of Proof

Following the hearing, the Disciplinary Committee will deliberate in private and determine whether the respondent is responsible for violating the Student Code of Conduct. Decisions are based on the preponderance of the evidence standard, meaning that it is more likely than not that the alleged violation occurred. An individual found responsible for sexual assault may be subject to disciplinary sanctions including probation, suspension, expulsion, or dismissal.

If a violation is found, the Committee will also determine appropriate sanctions and any required educational or corrective actions.

Sanctions

Sanctions are designed to be educational and proportionate and may include:

- Written Warning.
- Disciplinary Probation.
- Educational Assignments or Training.
- Loss of Privileges.
- Suspension.
- Expulsion.
- Combination of sanctions.

Factors considered include severity, intent, impact, and prior conduct history.

Notification, Records, and Privacy

All outcomes of investigations or conduct proceedings are communicated in writing via the individual's official University email account. This ensures timely and secure delivery of important information.

The University maintains all records related to reports, investigations, and hearings in a secure manner, in accordance with applicable laws, regulations, and University policies.

Access to records is strictly limited to authorized personnel who require the information to perform their duties. Records are treated as confidential, and information is shared only on a need-to-know basis. The University takes all reasonable measures to protect the privacy of individuals involved in the process.

Appeals

An appeal may be requested only on specific grounds, including:

- **Procedural Error:** A significant error in the conduct process that may have affected the outcome.
- **New Evidence:** Evidence that was not reasonably available at the time of the hearing and could materially impact the decision.

Appeals cannot be submitted simply because an individual disagrees with or is dissatisfied with the outcome. Appeals are meant to address procedural concerns or new evidence, not personal preference.

Appeals must be submitted in writing within five (5) business days of the date of the outcome notification to the Campus Director. The appeal should clearly state the grounds for review and provide supporting documentation where applicable. Decisions on appeal are final. Once an appeal decision has been issued, no further review will be conducted within the University, except as required by law.

Rights of the Parties in an Institutional Proceeding:

During the course of the process described in the previous section, both the accuser and the individual accused of the offense are entitled to:

1. A prompt, fair and impartial process from the initial investigation to the final result.
 - A prompt, fair and impartial process is one that is:
 - Completed within reasonably prompt timeframes designated by the institution's policy, including a process that allows for the extension of timeframes for good cause, with written notice to the accuser and the accused of the delay and the reason for the delay.
 - Conducted in a manner that:
 - Is consistent with the institution's policies and transparent to the accuser and the accused.
 - Includes timely notice of meetings at which the accuser or accused, or both, may be present; and
 - Provides timely access to the accuser, the accused and appropriate officials to any information that will be used during the informal and formal disciplinary meetings and hearings.

- Conducted by officials who do not have a conflict of interest or bias for or against the accuser or the accused.
- 2. Proceedings conducted by officials who, at a minimum, receive annual training on the issues related to dating violence, domestic violence, sexual assault, and stalking and on how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability.
 - Such training addresses topics such as the definition of sexual harassment; the scope of the University's education programs and activities; how to conduct investigations, hearings, and appeals and informal resolutions (as applicable); relevant evidence and how it should be used during a proceeding; proper techniques for questioning witnesses; basic procedural rules for conducting a proceeding; and avoiding actual and perceived conflicts of interest.
- 3. The same opportunities to have others present during any institutional disciplinary proceeding, including the opportunity to be accompanied to any related meeting or proceeding by the advisor of their choice. The institution may not limit the choice of advisor but may establish limits regarding the extent to which that advisor may participate in the proceeding, as long as those limits apply equally to both parties.
- 4. Have the outcome determined using the preponderance of the evidence standard.
- 5. Simultaneous, written notification of the results of the proceeding, any procedures for either party to appeal the result, any change to the result, and when the result becomes final. For this purpose, "result" means "any initial, interim and final decision by an official or entity authorized to resolve disciplinary matters" and must include the rationale for reaching the result and any sanctions imposed.

Possible Sanctions or Protective Measures that the University May Impose for Dating Violence, Domestic Violence, Sexual Assault or Stalking Offenses:

Following a final determination in the institution's disciplinary proceeding that dating violence, domestic violence, sexual assault, or stalking has been committed, the institution may impose a sanction depending on the mitigating and aggravating circumstances involved. The possible sanctions include warning; reprimand; probation; restitution; fine; loss of privileges; housing probation; suspension or expulsion/termination; restriction on eligibility to represent the University at any official function or in any intercollegiate competition. If a suspension is imposed on a student, it may be for part of a semester, a full semester, or an entire academic year. An employee may be suspended for any length of time determined appropriate by the Director of Human Resources. Following a suspension, the individual will be required to meet with the Campus Director to discuss re-entry and expectations going forward.

In addition, the University can make available to the victim a range of protective measures. They include forbidding the accused from communicating with the victim, other institutional

no-contact orders, security escorts, modifications to academic requirements or class schedules, changes in working situations, etc.

Publicly Available Recordkeeping:

The University will complete any publicly available recordkeeping, including Clery Act reporting and disclosures, without the inclusion of personally identifiable information about victims of dating violence, domestic violence, sexual assault, and stalking who make reports of such to the University to the extent permitted by law.

Victims to Receive Written Notification of Rights:

When a student or employee reports to the University that he or she has been a victim of dating violence, domestic violence, sexual assault, or stalking, whether the offense occurred on or off campus, the University will provide the student or employee a written explanation of his or her rights and options as described in the paragraphs above.

Sex Offender Registration Program:

The Campus Sex Crimes Prevention Act of 2000 requires institutions of higher education to advise members of the campus community where they can obtain information provided by the state concerning registered sex offenders. It also requires sex offenders to notify the state of each institution of higher education in the state at which they are employed or enrolled or carrying on a vocation. The state is then required to notify the University of any such information it receives. Anyone interested in determining whether such persons are on this campus may do so by contacting the Campus Director Elisa Alvarez at 00 34 91 448 24 88. State registry of sex offender information may be accessed at the following link: Spain does not maintain a registry of sex offender information.

Timely Warnings & Emergency Response

Timely Warnings

In the event of criminal activity occurring either on campus or off campus that in the judgment of the Campus Director is responsible for determining if a situation constitutes a serious or continuing threat to members of the campus community and to issue warnings or initiating an emergency response. During the Campus Director's absence, the Manager of Operations will complete this function. Examples of such situations may include a sexual assault or a series of motor vehicle thefts in the area that merit a warning because they present a continuing threat to the campus community. Warnings will be communicated to students and employees via one or more of the methods discussed later in this section. Updates to the warnings will be provided as appropriate.

Anyone with information warranting a timely warning should immediately report the circumstances to:

- Campus Director, +34 91 448 24 88
- Manager of Operations, +34 64 556 8501

The University has communicated with local law enforcement asking them to notify the University if it receives reports or information warranting a timely warning.

Emergency Response

The University has an emergency management plan designed to ensure there is a timely and effective response in the event of a significant emergency or dangerous situation occurring on campus involving an immediate threat to the health or safety of members of the campus community. Such situations include, but are not limited to tornadoes, bomb threats, chemical spills, disease outbreaks, fires, active shooters, etc. The University has communicated with local police requesting their cooperation in informing the University about situations reported to them that may warrant an emergency response.

Students, staff and visitors are encouraged to notify the Campus Director (+34 91 448 24 88) of any emergency or potentially dangerous situation.

Students, staff and visitors are encouraged to notify the Campus Director at +34 91 448 24 88 of any emergency or potentially dangerous situation.

The Campus Director will access available sources of information from campus administrative staff and local authorities to confirm the existence of the danger and will be responsible for initiating the institution's response and for marshaling the appropriate local emergency response authorities for assistance. Depending on the nature of the emergency, other University departments may be involved in the confirmation process.

Once the emergency is confirmed and based on its nature, the Campus Director will consult with other appropriate University officials to determine the appropriate segment or segments of the University community to be notified.

The Campus Director in collaboration with other appropriate personnel, will determine who should be notified, and will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to or otherwise mitigate the emergency.

Depending on the segments of the campus the notification will target, the content of the notification may differ. When appropriate, the content of the notification will be determined in consultation with local authorities. Also, as appropriate, the notification will give guidance as to whether its recipients should shelter in place or evacuate their location.

The Campus Director will direct the issuance of emergency notifications, which will be accomplished using one or more methods discussed later in this section, depending on the nature of the threat and the segment of the campus community being threatened.

At the direction of the Campus Director, the University will notify local law enforcement of the emergency if they are not already aware of it and local media outlets in order that the larger community outside the campus will be aware of the emergency.

Methods for Issuing Timely Warnings and Emergency Notifications

The method(s) listed below may be utilized when the University issues a timely warning or emergency notification to the campus community.

Method	Sign Up Instructions
Blackboard Platform	All students & employees automatically registered
Email	All students & employees automatically registered
Visit to classrooms/alarm	Not applicable
Student Portal	All students automatically registered

Testing & Documentation

The University tests its emergency response and evacuation procedures at least once a year. The tests may be announced or unannounced. Also, at various times the Emergency Management Team will meet to train and test and evaluate the University's emergency response plan.

The Campus Director maintains a record of these tests and training exercises, including a description of them, the dates and times they were held and an indication of whether they were announced or unannounced. In connection with at least one such test, the University will distribute to its students and employees' information to remind them of the University's emergency response and evacuation procedures.

Stop Campus Hazing Policy and Programming

Hazing, which is defined as any activity expected of someone joining or participating in a group that humiliates, degrades, abuses, or endangers them, regardless of the person's willingness to participate, is prohibited by the University.

If you are a victim of hazing, go to a safe place and call 112.

You may also contact the institution's Campus Director at +34 91 448 24 88 or the Title IX Coordinator at +1 (813) 323-3353.

Those who witness or hear about an incident of hazing are also encouraged to report in the same manner.

When a report of hazing is received, the Campus Director (for student reports) or Director of Human Resources (for employee reports) will make a determination regarding whether an investigation must occur. If so, an investigator will be assigned to gather information and conduct interviews, as appropriate. The investigator will report any findings and make a recommendation for sanctions as appropriate to the relevant administrator for implementation. The institution strives to complete the investigation within 30 days.

An individual may appeal the decision to the University President within 5 days of being notified of the decision. The appeal officer will render a decision within 14 days of receiving an appeal. The appeal officer's decision is final.

Hazing Prevention and Awareness Program

The institution provides prevention and awareness programming related to hazing at orientation and annually through in-person training, brochures, and periodic awareness campaigns. The community is reminded that hazing is prohibited and is provided with information regarding how to file a report, how reports of hazing are investigated, and information regarding local, state and tribal laws on hazing.

In addition, the institution provides research-informed programming for students and employees that covers a wide range of information designed to stop hazing before it occurs. It includes information regarding bystander intervention, such as how to take steps to watch out for those around you, as well as information regarding ethical leadership. Community members are also provided with information regarding how to strengthen group ties without engaging in hazing behavior.

Hazing Laws in Spain

Under Spain's University Coexistence Law (Ley 3/2022, de Convivencia Universitaria), hazing and other humiliating or degrading conduct that seriously undermines a person's dignity are classified as a very serious disciplinary offense within universities.

Students found responsible may face sanctions including:

- Suspension from the university.
- Loss of certain student privileges.
- Other disciplinary measures imposed by the institution.

Many Spanish universities, including universities in Madrid, have adopted specific anti-hazing policies and reporting procedures that prohibit initiation rituals and related misconduct.

Criminal Liability

Although "novatadas" are often associated with student initiation rituals, conduct occurring during hazing may violate provisions of the Spanish Penal Code involving:

- Harassment
- Coercion
- Assault
- Threats

- Psychological abuse
- Sexual misconduct
- Physical injury or endangerment

Activities such as forced alcohol consumption, public humiliation, physical abuse, intimidation, or degrading treatment may therefore result in criminal as well as disciplinary consequences.

Crime Statistics

The statistical summary of crimes for this University over the past three calendar years follows:

Crime	On Campus			Non-Campus			Public Property		
	2025	2024	2023	2025	2024	2023	2025	2024	2023
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Manslaughter by Negligence	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	1	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Hazing	0	N/A	N/A	0	N/A	N/A	0	N/A	N/A
Arrest - Liquor Law Violation	0	0	0	0	0	0	0	0	0
Arrest - Drug Abuse Violation	0	0	0	0	0	0	0	0	0
Arrest - Weapon Violation	0	0	0	0	0	0	0	0	0
Disciplinary Referral - Liquor Law Violation	0	0	0	0	0	0	0	0	0
Disciplinary Referral - Drug Abuse Violation	0	0	0	0	0	0	0	0	0
Disciplinary Referral - Weapon Violation	0	0	0	0	0	0	0	0	0
Domestic Violence	0	0	0	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0	0	0	0
Stalking	0	0	0	0	0	0	0	0	0

* The University does not have on-campus student housing facilities.

Spanish law enforcement agencies do not publish or release geographical crime statistics in support of the United States' Clery Act.

Hate crimes:

2025: No hate crimes reported.

2024: No hate crimes reported.

2023: No hate crimes reported.

Statistics for unfounded crimes provided by law enforcement agencies:

2025: 0 unfounded crimes.

2024: 0 unfounded crimes.

2023: 0 unfounded crimes.

Data from law enforcement agencies:

- Certain law enforcement agencies did not comply with the University's request for crime statistics.