
Annual Security Report 2021

The logo for Baylor College of Medicine, featuring the text "Baylor College of Medicine" in white serif font centered within a dark blue square.

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Medicine®

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This 2021 Annual Security Report documents crime statistics for 2020 calendar year in accordance with federal reporting requirements.

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Letter from the Director of Security

The Baylor College of Medicine (BCM) Security Department is charged with providing a safe and secure environment for students, staff, and faculty. Although security is our job, we also believe everyone at BCM has a shared responsibility for the safety of our institution. If you see something suspicious, please contact the BCM Security Command Center at 713-798-3000 or dial 911 immediately.

The Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act (Clery Act) requires all postsecondary institutions to publish an annual campus security report by October 1st of each year. This Annual Security Report informs the Baylor College of Medicine community of Clery-reportable crime statistics for the past three years and contains institutional policies and programs that pertain to sexual misconduct, safety and crime prevention, and procedures notifying the campus community of an emergency event. The Director of Security at BCM works with local law enforcement agencies of the jurisdictions surrounding BCM and other BCM-operated offices. The goal of the Security Office is to provide a safe, orderly, and secure community in which Baylor College of Medicine may carry out its mission of research, education, healthcare, and community service.

Any questions regarding BCM's campus safety and security should be directed to the Baylor College of Medicine Security Department at One Baylor Plaza, Houston, TX 77030, by phone at 713-798-3000, or via email to dl-security@bcm.edu.

- Anyone experiencing an on-campus emergency may call extension 8811 (713-798-8811)
- For non-emergency assistance, please call BCM Security Office at extension 8-3000 (713-798-3000).

Introduction

Baylor College of Medicine (BCM) is a health sciences university located in Houston, Texas. BCM is a member of the Texas Medical Center (TMC), the largest medical complex in the world with twenty-one hospitals, thirteen support organizations, eight academic and research institutions, six nursing programs, three public health organizations, three medical schools, two universities, two pharmacy schools, and a dental school.

BCM is made up of four schools that share a single campus: the School of Medicine, the Graduate School of Biomedical Sciences, the School of Allied Health Sciences, and the National School of Tropical Medicine. BCM maintains no student housing or residential facilities. BCM has hospital affiliations with numerous medical facilities within TMC and its students and faculty routinely transit between BCM and the other medical institutions. Please visit <https://www.bcm.edu/> for more information.

This Annual Security Report was prepared by the BCM Clery Committee comprised of representatives from the Office of General Counsel, Security Department, Office of the Provost, Department of Human Resources, and Office of Communications. The Report can be located on the Baylor College of Medicine website at <https://www.bcm.edu/about-us/our->

campus/compliance/crime-reporting or in hard copy from the BCM Security office located at One Baylor Plaza, Service Building, Room BCM-112H, Houston, TX. Students, faculty, and staff are notified of the Report's availability via email on or before October 1st annually.

Campus Security

The BCM Security Department is committed to providing a safe and secure environment for students, staff, faculty, and visitors. The Security Department operates 24 hours a day, seven days a week. The BCM Security Department is composed of the following: (1) Director, (1) Manager, (1) Accounting Assistant, (1) Data Processor (Badging), (1) Security Tech Specialist, (2) Uniformed Security Officers, (1) Parking Attendant, (7) Security Supervisors (Emergency Console), (9) Security Desk Attendants, (1) Houston Police Department (HPD) Coordinator, and (18) HPD Officers of which at least one is on duty and present on the campus at all times.

Although BCM does not have a formal written agreement regarding the use of HPD officers on campus, the Houston Police Department (HPD) has an Extra Employment Division that reviews and approves requests made by HPD officers to work outside of their regular HPD duties. BCM is an approved site within that division and all officers working at BCM have to file with the division for a permit to work at BCM.

Quick Facts

- The BCM Security Department will respond to all emergencies that occur on campus.
- BCM's HPD Officers are involved in all crime reporting on campus and the information is provided to the HPD directly. Any follow up investigation is coordinated between the BCM Security Department and HPD's respective division.
- The Security Department assists all students, employees, visitors, and patients who are victims of a crime by advising and/or contacting the appropriate agency. Victims of any crime, whether or not it occurs on BCM's campus, are urged to report the crime to the HPD or other appropriate agency.
- BCM Security Officers are not empowered to make arrests. In the event of a crime occurring on the BCM campus, Security Officers make every effort to detain a suspect of a crime until the TCM Police or HPD Officers arrive. BCM Security Officers will enforce all BCM Policies and Procedures.
- Security personnel participate in mandatory orientation programs for new students and employees and train incoming BCM Personnel (e.g. students, residents, fellows, faculty, staff) about campus safety and crime prevention. The Security Department also provides presentations throughout the year and hosts HPD presentations.
- The Executive Director of Security participates in the Student Services Committee and chairs the Security Subcommittee. This committee provides for continued

communication of safety prevention as well as feedback to security management of students' safety concerns.

Our Statistics

Due to its location within the world's largest medical center, BCM has many individuals passing through and around its on- and off-campus properties every day. Occasionally, BCM has incidents that require the Security Department's expertise, and we publish this information in a daily incident log available to the public at One Baylor Plaza, Service Building, Room BCM-112H, Houston, TX.

Campus Access and Safety Features

BCM does not allow open access to the public to enter its facilities. Security checkpoints are staffed by Security Officers at the three main entrances to the campus. These checkpoints are staffed during normal business hours, with the main Cullen Building entrance staffed until 10:00pm nightly and during the day on weekends and holidays. All visitors must present a valid form of identification for entry and receive a temporary visitor's badge. The temporary badge is only valid on the day of issuance and reflects the date, name of the individual, and their campus destination. After normal business hours, the public entry doors are locked and badge access is required. Other entry doors around the campus are designated BCM student and employee entry only and require BCM badge access at all times. BCM students and employees are required to display their BCM badges at all times while on campus.

The BCM Security Department issues all badges and monitors their use at all times in the security control center located on campus. All entry doors are also monitored by security cameras. In addition to using badge access, cameras, and Security Officers, BCM's entry points and exterior campus pathways are regularly maintained to ensure they remain well-lit and easily navigable. This maintenance is carried out jointly by BCM's Security and Facilities Departments.

Safety Initiatives, Education, and Crime Prevention Efforts

The Security Department publishes information on campus safety programs, education, and crime prevention on their website. BCM employees and students can access information by visiting the following webpages:

- Crime Statistics and Prevention Guidelines
 - <https://intranet.bcm.edu/?tmp=/security/crime-prevention>
- Online Security Resources
 - <https://intranet.bcm.edu/?tmp=/security/security-resources>
- Personal Safety and Security
 - <https://intranet.bcm.edu/index.cfm?tmp=/security/home>

Both Baylor College of Medicine and The Texas Medical Center (TMC) provide access to shuttles. Information about shuttling services can be found by visiting:

- BCM Parking and Transportation Services
 - <https://intranet.bcm.edu/?tmp=/finance/shuttleservices>
- Texas Medical Center Shuttle Service
 - <http://www.texasmedicalcenter.org/parking/shuttle/>

Security is a consideration in the design of all new and renovated campus areas campus, including physical and electronic security systems, as well as any facility access designs.

The Security Office provides either an in-person or video presentation on campus safety to new trainees, faculty, and staff as part of their orientation or onboarding process. The Human Resources' Employee Relations team conducts sexual harassment trainings and provides education to new trainees, faculty, and staff as part of their orientation or onboarding process.

The Security Office works collaboratively with the TMC on safety tools and measures which impact the BCM community. For example, blue light telephones are located around the TMC to assist BCM Community Members with contacting help during an emergency. Additional emergency information and protocols can be found by visiting:

- Baylor College of Medicine Emergency Management Guide
 - <https://intranet.bcm.edu/?tmp=/security/emergency-management>

Campus Crime Reporting

BCM strongly encourages the prompt reporting of criminal incidents, emergencies, and suspicious activity to the BCM Security Department. The emergency number is 713-798-8811 or extension 8811 from a campus phone line. Individuals are also encouraged to alert local law enforcement of emergency situations by dialing 911. For assistance with non-emergencies, individuals can reach the BCM Security Office by phone at 713-798-3000, by fax at 713-798-6488, or via email to bcm-security@bcm.edu.

BCM respects the rights of individuals who wish to report crimes anonymously. While anonymous reporting may affect BCM's ability to investigate and address the crime, it still allows BCM to include the crime for statistical purposes. Individuals may report anonymously to the Integrity Hotline by calling 855-764-7292 or at the following link: https://secure.ethicspoint.com/domain/en/default_reporter.asp (enter organization name as Baylor College of Medicine). Additional information on crime reporting is addressed in BCM's Sexual Harassment and Sexual Violence Policy.

Off-Campus Crime Reporting

Baylor College of Medicine maintains no student housing or residential facilities. Additionally, BCM has no recognized off-campus student organizations such as fraternities or sororities that would require policies or procedures regarding monitoring off-campus criminal activity. Thus, BCM does not provide any law enforcement, security, or patrol to off-campus locations.

Criminal activity at any off-campus property controlled by BCM is monitored by the local law enforcement agency with jurisdiction in that area. When appropriate, the BCM Security Department assists local law enforcement to the fullest extent possible. The Security Office works closely with the Houston Police Department (HPD) and the Texas Medical Center (TMC) Police. HPD information can be found on <http://www.houstontx.gov/police/>. The TMC Police & Security information can be found on <http://www.texasmedicalcenter.org/contact/>.

Texas Medical Center Emergency Numbers:

Baylor Clinic	832-355-7257
Baylor College of Medicine Security	713-798-3000
Baylor St. Luke's Medical Center, TMC	832-355-4243
Baylor St. Luke's Medical Center, McNair	713-798-8403
Ben Taub Hospital	713-873-2502
CNRC	713-798-6767
Greenway Plaza	713-965-2931
Houston Methodist Security	713-441-9511
Jamail Specialty Care Center	713-798-9900
McGovern Campus	713-749-0808
MD Anderson Hospital	713-792-2890
Memorial Hermann Hospital	713-704-0000
Neurosensory Center	713-441-9501
O'Quinn Towers	832-355-4243
Rice University	713-348-6000
Texas Children's Hospital	832-824-5400
Texas Medical Center Police	713-795-0000
TIRR	713-799-6999
University of Texas Police	713-792-2890
VA Hospital Police Department	713-794-7106

Policy Information

Weapons and Firearms on Campus and Workplace Violence

BCM's Weapons and Firearms on Campus Policy and the Workplace Violence Policy work together to provide a safe environment for students and employees.

In accordance with [Chapter 46 of the Texas Penal Code](#) (see Sections 46.01 – 46.03), BCM's Weapons and Firearms on Campus Policy reflects BCM's decision to opt out of Texas Senate Bill 11 (the campus carry law) and prohibits both concealed and open carry of handguns, firearms, and weapons on BCM property. No BCM Community Member (i.e., trustees, faculty, staff, residents, postdoctoral trainees and fellows, students, contractors, guests, and invitees) is allowed to possess or carry a weapon or firearm while on the BCM campus, in BCM facilities, or in any vehicle owned and operated by BCM (e.g., shuttles), except as authorized by the policy. Licensed peace officers, other law enforcement agents, and military personnel are exempt from these prohibitions while acting in their official capacities. The policy does not prohibit the use or carry of small chemical dispensers sold commercially for personal protection (e.g., pepper spray, mace spray) or otherwise lawful storage of a firearm inside a personal motor vehicle in parking lots and garages owned or operated by BCM. Anyone with knowledge of violations of this policy is strongly encouraged to contact the Security Office immediately or make a report through the [Integrity Hotline](#) at 855-764-7292.

The BCM Policy includes the following defined terms, derived from the Texas Penal Code:

- **Weapon** – means any instrument or object designed or used to inflict harm or physical damage on structures, systems, or persons. Examples of weapons include but are not limited to explosive weapons, firearms, illegal knives, clubs, hoax bombs, hoax weapons, and noxious, caustic, or toxic chemicals. Weapons do not include noxious, caustic, or toxic chemicals that have been acquired by BCM for research purposes, which are stored and handled in accordance with other BCM policies and applicable laws.
- **Club** – means an instrument that is specially designed, made, or adapted for the purpose of inflicting serious bodily injury or death by striking a person with the instrument. Examples of clubs include but are not limited to blackjacks, nightsticks, tomahawks, metal knuckles, and maces.
- **Explosive weapon** – means any explosive or incendiary bomb, grenade, rocket, or mine, that is designed, made, or adapted for the purpose of inflicting serious bodily injury, death, or substantial property damage, or for the principal purpose of causing such a loud report as to cause undue public alarm or terror, and includes a device designed, made, or adapted for delivery or shooting an explosive weapon.
- **Firearm** – means any device designed, made, or adapted to expel a projectile through a barrel by using the energy generated by an explosion or burning substance or any device readily convertible to that use. Examples of firearms include but are not limited to handguns, machine guns, rifles, air guns, and zip guns.
- **Handgun** – means any firearm that is designed, made, or adapted to be fired with one hand.

- **Hoax bomb** – means a device that reasonably appears to be an explosive or incendiary device, or its design causes alarm or reaction of any type by a BCM security officer, official of a public safety agency, or a volunteer agency organized to deal with emergencies.
- **Hoax weapon** – means a device that reasonably appears to be a weapon, or which causes alarm or reaction of any type by a BCM security officer, official of a public safety agency, or a volunteer agency organized to deal with emergencies.
- **Illegal knives** – includes all of the following: i) knife with a blade over five and one-half inches, ii) hand instrument designed to cut or stab another by being thrown, iii) dagger, including but not limited to a dirk, stiletto, and poniard; iv) bowie knife; v) sword; or vi) spear.
- **Knife** – means any bladed hand instrument that is capable of inflicting serious bodily injury or death by cutting or stabbing a person with the instrument.
- **Machine Gun** – means any firearm that is capable of shooting more than two shots automatically, without manual reloading, by a single function of the trigger.
- **Air gun** – means a device that expels a projectile using compressed air or some other gas. Examples of air guns include pellet guns and bb guns.
- **Zip Gun** – means a device or combination of devices that was not originally a firearm and is adapted to expel a projectile through a smooth-bore or rifled-bore barrel by using the energy generated by an explosion or burning substance.

BCM's Workplace Violence Policy demonstrates BCM's commitment to providing a safe working and learning environment by prohibiting acts of intimidation, implied threats, threats of violence, and acts of violence on campus, in all facilities owned or operated by BCM, and at College-sponsored events. Prohibited workplace violence includes: possession or use of weapons or firearms, abusive or profane language, allusions to violence or angry outbursts which a reasonable person would perceive as threatening; violent conduct such as dangerous pranks, aggressive horseplay, or the reckless disregard for safety which puts others at risk of being injured; fighting, assaults, or willful destruction of College property; talking or unwanted pursuit, blocking or preventing an individual from exiting.

BCM has zero tolerance towards workplace violence. All reports of workplace violence will be investigated. Appropriate disciplinary action, up to and including termination and referral to law enforcement agencies, will be taken in response to violations of the policy. Additionally, in the event that a vendor is involved in violence in BCM, the vendor may be prohibited from conducting future business with BCM.

In order to maintain a safe working environment, every individual is responsible for reporting concerns about workplace violence immediately. In emergency situations where bodily harm is imminent, students, and employees should call the Security Office at 8-811 immediately if dialing from a BCM phone or 713-798-8811. In non-emergency situations, contact the [Integrity Hotline or dial](#) 713-798-3000. BCM prohibits retaliation against any person who makes a report regarding workplace violence.

Prevention – the Critical Incident Response Team (CIRT). The Critical Incident Response Team was created to oversee the workplace violence prevention program, to respond to reports and incidents of violence, and to provide advice and guidance to BCM. The CIRT is led by BCM Security and contains representatives from Human Resources, the Office of General Counsel, and the Department of Psychiatry and Behavioral Sciences. Ad hoc members of CIRT include representatives from Public Affairs, Risk Management, and senior management representatives, as necessary.

Substance and Alcohol Abuse Policy

The Federal Drug-Free Workplace Act serves as the foundation upon which BCM built its substance and alcohol abuse policy. As a drug-free workplace, BCM's [Substance and Alcohol Abuse Policy](#) (02.5.34) prohibits the possession, use, and sale of alcohol and prohibited substances (e.g., illegal drugs, misused controlled substances) on campus, in facilities owned or operated by BCM, and during any off-campus activity or circumstance in which BCM Personnel (e.g., student, resident, fellow, faculty, or staff member) acts as a BCM representative. Any BCM Personnel who reports to class or work while under the influence of prohibited substances or alcohol will face disciplinary action up to and including dismissal from a degree-granting program and employment termination.

In the event that circumstances indicate a reasonable suspicion of alcohol or substance use (e.g., physical observation of impairment, abnormal or erratic behavior, arrest, or conviction for alcohol or drug-related offense), BCM may require the student or employee to submit to testing. BCM will take steps to preserve the confidentiality of test results to the extent possible, but will notify the appropriate supervisor(s) if this policy has been violated, and may provide a copy of test results as required for administrative proceedings or disciplinary actions (e.g., adverse action) conducted by BCM and/or state or federal authorities, as appropriate.

Anyone with knowledge of a policy violation is strongly encouraged to contact the Security Office immediately or make a report through the Integrity Hotline. BCM's Policy further mandates reporting of any alcohol or drug-related convictions arising out of a violation of the policy within five days of adjudication, and such persons are required by BCM to complete an approved rehabilitation program to remain in good academic standing or continue employment.

The BCM policy provision facilitates alignment with criminal statutes describing alcohol and drug offenses in the State of Texas, as well as notice to BCM regarding a student or employee's legal and health status. This notice allows BCM to remind students and employees to avail themselves of mental and physical health services that BCM makes available at no cost, and direct persons affected to seek help from the following College sources:

- *Physical Health Services for Students:*
 - Wellconnect: 866-640-477 or <http://www.wellconnectbysrs.com>
- *Mental Health Services for Students, Residents and Fellows:*
 - 713-798-4881 or student-help@bcm.edu
- *Mental and Physical Health Services for Employees:*
 - Employee Assistance Program: 713-500-3008 or 866-893-3776

Because BCM provides medical and graduate health sciences education and training programs, to the exclusion of Baccalaureate degrees, all students have already reached the legal age of majority upon enrollment, thus BCM has no policy regarding enforcement of state underage drinking laws.

Crime Log

For the most recent 60-day period, the BCM Security Department maintains a public, written, daily crime log that records any crime reported to the Security Department that occurred on campus, on a noncampus building or property, or on public property falling within BCM's federal reporting areas. The log includes the nature of the crime, date, time, general location, and disposition (if known). Information may be withheld only pursuant to federal reporting exceptions. The log is available at the BCM Security Office located at One Baylor Plaza, Service Building, Room BCM- 112H, Houston, TX during normal business hours.

Timely Warning Protocol

Baylor College of Medicine issues timely warnings when crimes occur that may pose a serious and continued threat to BCM students and employees. The purpose is to aid in the prevention of any similar crime or incident. BCM may issue timely warnings for other events when deemed appropriate.

When an incident that meets the above-referenced criteria is made known to the BCM Security Department, immediate notification to the Provost Office and the Communications Department management will be made. The Communications Department in conjunction with the Provost Office will construct the appropriate language for the warning. The warning will then be sent electronically via email to all students and employees. BCM may also use other forms of notification such as the BCM website and the BCM Emergency Notification System.

Emergency Notification Policy

BCM has implemented an Emergency Notification System to alert students, faculty, staff and affiliates of a crisis or catastrophic event. Situations in which an Emergency Notification will be issued include, but are not limited to, the following: active shooter, fire, bomb threat, chemical spill, weather conditions, and campus closings. Emergency Notifications can be generated by the Vice President of Communications, Assistant Vice President of Communications, and the BCM Security Director.

BCM uses the Blackboard Connect System to alert all students and employees of significant emergencies or dangerous situations that may cause an immediate threat and affect the safety and health of everyone on campus. All students and employees are automatically enrolled in the emergency notification system with their BCM contact information. Students and employees are encouraged during orientation to log in to the emergency notification system and add additional electronic methods by which they may receive alerts such as, private email, cell phone, home phone, and social media.

BCM also publishes an Emergency Management Guide available to BCM Personnel (e.g. students, residents, fellows, faculty, staff) on the BCM Intranet. The purpose of this Emergency Management Guide is to assist BCM Community Members during emergencies such as fires, disasters, bomb threats, or medical emergencies. All Community Members are encouraged to review the manual periodically as a proactive safety measure and to keep a copy of the manual in a visible location so that it is easily available when needed.

Sex Offenses and Sexual Harassment

BCM is committed to providing a safe and supportive environment for all Community Members which includes BCM's Board of Trustees, faculty, staff, residents/fellows, postdoctoral trainees, and students. BCM believes that all individuals have the right to be free from all forms of sex and gender-based discrimination.

BCM prohibits sexual misconduct and other forms of sex and gender-based discrimination through its Title IX Misconduct and Grievance Policy and Procedures (02.2.20), Sexual Misconduct and Other Prohibited Conduct Policy (02.2.26), Policy Regarding Harassment, Discrimination, and Retaliation (02.2.25), and the BCM Code of Conduct. 'BCM's policies prohibit Dating Violence, Domestic Violence, Sexual Assault, Sexual Exploitation, Sexual Harassment, Sexual Misconduct, and Stalking (Prohibited Conduct). While BCM utilizes different standards and definitions than those found in criminal statutes, Prohibited Conduct often overlaps with the crimes of dating violence, domestic violence, rape, sexual assault, sexual exploitation, sexual harassment, and stalking. Those affected by these actions are protected by federal laws, specifically Title IX as well as the Clery Act which governs this report's contents. BCM's Prohibited Conduct standards and definitions are also consistent with the requirements under the Violence Against Women Act, which requires BCM to inform students of the local definitions of the crimes of sexual assault, dating violence, domestic violence, and stalking, as well as a consent definition.

BCM utilizes the following definitions for acts of Prohibited Conduct:

- **Dating Violence** – violence committed by a person who is or has been in a social relationship of a romantic or intimate nature. The existence of such a relationship is based on consideration of: 1) the length of the relationship, 2) the nature of the relationship, and 3) the frequency of interactions between persons involved in the relationship. Dating Violence includes but is not limited to sexual abuse, physical abuse, or the threat of such abuse. Dating violence does not include acts covered under the definition of domestic violence.
- **Domestic Violence** – an act of violence committed by a current or former spouse, intimate partner, domestic partner, co-parent (a person who shares a child in common), person similarly situated to a spouse under the domestic or family violence laws of the State of Texas, or by any other person against an adult or youth who is protected from that person's acts under the domestic or family violence laws of the State of Texas.'
- **Sexual Assault** – a form of sexual violence that includes any offense that meets the definition of Rape, Fondling, Incest, or Statutory Rape:

- 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.
- Fondling: the touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his or her age or because of his or her temporary or permanent mental incapacity.
- Incest: sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

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

- **Sexual Exploitation** – Non-Consensual sexual advances of another that does not otherwise constitute one of the other types of Prohibited Conduct defined in this policy. Examples of sexual exploitation include: going beyond boundaries of sexual Consent, prostitution of a person; Non-Consensual photography, video or audio recording of sexual activity; Non-Consensual photography or video of a nude or partially-nude person; Non-Consensual sharing or distribution of a photograph, video or audio recording of sexual activity; voyeurism; knowingly transmitting a sexually transmitted infection (STI) or HIV to another person; exposing one’s genitals in Non-Consensual circumstances; exposing another’s genitals in Non-Consensual circumstances.
- **Sexual Harassment** – conduct on the basis of sex that satisfies one or more of the following:
 - An employee of the College conditioning the provision of an aid, benefit, or service of the College on an individual’s participation in unwelcome sexual conduct;
 - Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the College’s education programs or activities; or
 - Any instance of “Sexual Assault,” “Dating Violence,” “Domestic Violence,” or “Stalking” as defined herein.

” Examples of sexual harassment include but are not limited to: attempted coercion of an unwilling person into a sexual relationship or experience; repeated subjection to egregious, unwelcomed sexual attention; punishment in response to a refusal to comply with a sexual request; or conditional benefits that require submission to sexual advances or requests.

- **Sexual Misconduct** (Non-consensual sexual contact or attempted contact) – any intentional sexual touching of a person however slight, with or without an object, that is without Consent and/or by Force. Examples of non-consensual sexual contact may include but are not limited to: intentional contact with the breasts, buttocks, groin or genitals; touching another with any of these body parts, or making another touch themselves, the Respondent, or another person with or on any of these body parts; any intentional bodily contact in a sexual manner, though not involving contact with any previously mentioned body part.

- **Stalking** – a Course of Conduct directed at a specific person that would cause a Reasonable Person to fear for his or her safety or the safety of others (e.g., family member, household member), or suffer Substantial Emotional Distress. For the purposes of this definition,
 - Course of Conduct means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person’s property;
 - Reasonable Person means a reasonable person under similar circumstances and with similar identities to the victim; and
 - Substantial Emotional Distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.’

Examples of stalking include: repeatedly following a person, persistent observation of a person in an intimidating manner; acts that threaten or intimidate a person through fear of bodily injury or death of self, or members of that person’s family or household; vandalism directed against that person’s property.

BCM utilizes the following definition for Consent:

- **Consent** – the clear, knowing, active and voluntary permission by a person of legal age to participate in sexual contact or sexual activity. Consent can be given by words or actions as long as those words or actions create mutually understood clear permission regarding an individual’s willingness to engage in and the conditions of the sexual contact or sexual activity. Consent is not passive; silence in and of itself cannot be interpreted as Consent. Consent to any one form of sexual contact or sexual activity does not automatically imply Consent to any other form of sexual activity, and Consent in any particular instance may not be inferred solely from Consent given in previous instances.

In addition to the definitions provided above, BCM utilizes the following definitions with regard to Title IX:

- **Advisor**– (1) an individual chosen by a Complainant or Respondent, at the Complainant’s or Respondent’s own expense, to provide support during any meetings or hearings related to the investigation and/or adjudication of a reported violation of this Policy and in accordance with the terms and restrictions in this Policy, or (2) if a Complainant or Respondent does not choose an Advisor, an individual provided by the College to the Complainant or Respondent for the sole purpose of cross-examining, as necessary, the other party or witnesses in a Live Hearing.
- **BCM Community Members** – includes the BCM Board of Trustees, faculty, staff, residents/fellows, postdoctoral trainees, contractors, and students enrolled in all schools and programs.
- **Complainant** – an individual who is alleged to be the victim of conduct that could constitute Title IX Misconduct under this Policy.

- **Education Program or Activity** – includes locations, events, or circumstances over which BCM exercised substantial control over both the Respondent and the context in which the harassment occurs. This phrase also includes any building owned or controlled by a student organization that is officially recognized by BCM, and encompasses all of the operations of BCM.
- **Formal Complaint** – a document filed by a Complainant or signed by the Title IX Coordinator alleging Title IX Misconduct against a Respondent and requesting that BCM investigate the allegation of Title IX Misconduct. As used in this definition, a “document filed by a Complainant” means a document or electronic submission that contains the Complainant’s physical or digital signature, or otherwise indicates that the Complainant is the person filing the Formal Complaint.
- **Title IX Misconduct** – Sexual Harassment, Sexual Assault, Dating Violence, Domestic Violence, and Stalking that occurs during an Education Program or Activity against an individual in the United States.
- **Reporter** – a person who provides information to BCM regarding an incident of Title IX Misconduct. A Reporter need not be a Complainant.
- **Respondent** – an individual who has been reported to be the perpetrator of conduct that could constitute Title IX Misconduct.
- **Retaliation** – Intimidation, threats, coercion, or discrimination against any individual for the purpose of interfering with any right or privilege provided by this Policy, or because the individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under this Policy. Intimidation, threats, coercion, or discrimination, including charges against an individual for code of conduct violations that do not involve sex discrimination or Title IX Misconduct, but arise out of the same facts or circumstances as a report or complaint of sex discrimination, or a report or formal complaint of Title IX Misconduct, for the purpose of interfering with any right or privilege secured by this Policy, constitute retaliation.

BCM recognizes the importance of a victim of sexual assault going to a hospital for treatment and preservation of evidence, if applicable, as soon as practicable after the incident. BCM further recognizes the right of a victim of a crime to choose whether to report the crime to law enforcement, to be assisted by BCM in reporting the crime to law enforcement, or to decline to report the crime to law enforcement. Finally, BCM recognizes the right of a victim of Title IX Misconduct to report the incident to BCM and to receive a prompt and equitable resolution of the report.

If you have experienced Dating Violence, Domestic Violence, Sexual Assault, Sexual Exploitation, Sexual Harassment, Sexual Misconduct, or Stalking, some or all of the following safety suggestions may be helpful:

- **Go to a safe place.** This could be the home of a friend, family member, neighbor, a community center, a fire station, or a police station.
- **Contact someone you trust.** It is important to talk to someone about what has happened. You do not have to go through this alone.

- **Preserve evidence.** It is important to preserve evidence even if there has not been a decision on whether or not to seek medical care or make a report. Evidence should be collected immediately in order to preserve the quality of the item(s). It is recommended that an individual not shower, bathe, wash hands, use the toilet, change clothes, or wash clothing/bedding after an assault. Items such as clothing/bedding should be placed in a paper bag. Other items such as photographs, videos, audio recordings, and communication via text, emails, and/or social media platforms should be saved.
- **Seek Medical Attention.** Health care professionals can provide treatment for injuries, test for sexually transmitted infections (STIs), and collect forensic evidence. Forensic exams are performed by specially trained doctors or nurses and can be completed even if an individual has not decided to make a report to local law enforcement. In the Texas Medical Center, **Ben Taub Hospital** (713-873-2000), and **Texas Children's Hospital** (832-824-1000), and **Memorial Hermann Hospital** (713-704-1261) provide forensic exams.
 - **The Houston Area Women's Center** (713-526-7273, www.hawc.org) and **The Montrose Center (LGBT support and services)**, (713-526-3211, www.montrosecenter.org) can provide free rides to and from the hospital as well as accompaniment from an advocate who can help individuals understand the process, available resources, and will stay during portions of the exam for support if desired.
- **Seek confidential support.** BCM offers faculty, staff, residents, fellows, postdoctoral trainees, and students access to confidential discussions and healthcare services at no additional cost.
 - For confidential discussions and healthcare services, consult:
 - Student and House Staff Mental Health Service: 713-798-4881 or student-help@bcm.edu
 - Wellconnect (students only): 866-640-477 or <http://www.wellconnectbysrs.com>
 - Employee Assistance Program (EAP) (faculty/staff only): 713-500-3008 or 866-893-3776
 - For confidential discussions only, consult:
 - Ombuds Office: (713) 798-5039, ombudsoffice@bcm.edu, or www.bcm.edu/ombuds
- **Making a report.** An individual who has experienced an act of violence or stalking has the option to notify or not notify authorities, including local law enforcement and College administrators. If notified, law enforcement officials can assist in obtaining orders of protection, restraining orders, or other court orders. If notified, College administrators can assist individuals with evaluating their options, contacting the appropriate law enforcement agency, and can offer interim remedial measures such as no contact orders and assistance with changes to work or academic environments.

Reporting Options

Baylor College of Medicine strongly encourages the prompt reporting of Dating Violence, Domestic Violence, Sexual Assault, Sexual Exploitation, Sexual Harassment, Sexual

Misconduct, or Stalking to local law enforcement, the BCM Security Office, a BCM faculty/staff member, or the BCM Title IX Coordinator or Deputy Coordinator. In the case of any emergency, call the police at 911.

Filing a criminal complaint by reporting to local law enforcement agencies:

- **Baylor College of Medicine Security Office**
 - Emergency: 713-798-8811 or 8-811 from the BCM phone system
 - Non-emergency: 713-798-3000
 - Email: bcm-security@bcm.edu
- **Texas Medical Center Police** (located in Garage #2)
 - 713-798-5000
- **Houston Police Department**
 - 713-884-3131
 - www.houstonpolice.org
- **Houston Police Department Sexual Assault Information Line**
 - 713-308-1400
 - Email: SAinfo@houstonpolice.org
- **Harris County Sherriff Office**
 - 713-221-6000
 - www.harriscountysos.org

Filing a complaint by reporting to Baylor College of Medicine:

In addition to or in lieu of reporting a criminal complaint to local law enforcement, individuals who have experienced Title IX Misconduct or Prohibited Conduct (Dating Violence, Domestic Violence, Sexual Assault, Sexual Exploitation, Sexual Harassment, Sexual Misconduct, or Stalking) can file a complaint with Baylor College of Medicine. BCM offers three reporting options: traditional, confidential, and anonymous. Complaints to BCM can be made even if police conclude there is insufficient evidence for criminal charges or the complainant does not want to participate further in BCM's investigation process. More information about each reporting option are provided below.

Traditional College Reporting:

Individuals who have experienced Prohibited Misconduct may file a report with the BCM Title IX Coordinator. More information can be found at [Title IX and Gender Discrimination \(bcm.edu\)](http://bcm.edu). Reports may be made to the College even if police conclude there is insufficient evidence for criminal charges, or the Complainant does not want to participate further in the College's investigation process or file a Formal Complaint. Online reports may be filed through the Integrity Hotline, and reports may otherwise be filed in-person, by telephone, through interoffice mail, U.S. Mail, or email to:

Title IX Coordinator

Toni Gray
title-ix@bcm.edu
713-798-8137

Deputy Title IX Coordinator

Marsha Brewington
Marsha.Brewington@bcm.edu
713-798-8137

Integrity Hotline

855-764-7292 or <https://secure.ethicspoint.com> (Enter Organization Name as Baylor College of Medicine)

Anonymous Reporting

Individuals who do not have a duty to report under the law and who wish to remain anonymous may report by telephone or in writing via the Integrity Hotline phone or web portals. All reports of Title IX Misconduct are forwarded to the Title IX Coordinators for processing. BCM takes seriously and investigates all reports received; however, the continuing anonymity of the Reporter may hinder the results of the investigation and the College's ability to stop the behavior, remedy its effects, and prevent recurrence. Integrity Hotline: 855-764-7292 or <https://secure.ethicspoint.com> (Enter "Baylor College of Medicine" as the Organization Name)

Confidential Reporting

An individual may make an anonymous complaint, as described below, without revealing their identity. A student may also speak confidentially with a Confidential Employee concerning Title IX or Prohibited Misconduct. **Confidential reporting is only available through the following** Baylor College of Medicine service programs:

- Student and House Staff Mental Health Service - (713) 798-4881 or student-help@bcm.edu;
- WellConnect (students only) - (866) 640-4777 or www.wellconnectbysrs.com;
- Employee Assistance Program (faculty/staff only) - (713) 500-3008 or (866) 893-3776;
- Additionally, the Baylor College of Medicine Ombuds Office is a resource that provides confidential discussion of any Baylor-related concern. Therefore, sharing information regarding the occurrence of sexual harassment, sexual violence, relationship violence, or stalking to the Ombuds does not constitute notice to the College and will not result in action by the College.
- Ombuds Office - (713) 798-5039, ombudsoffice@bcm.edu, or www.bcm.edu/ombuds
However, the BCM employee receiving the confidential report shall comply with their Clery obligations.

Mandatory Reporting by BCM Employees:

- a. Any BCM employee who, in the course and scope of employment, witnesses or receives information regarding the occurrence of an incident that the employee reasonably believes constitutes Title IX Misconduct and is alleged to have been committed by or against a person who was a student enrolled at or an employee of BCM at the time of the incident shall promptly report the incident to the institution's Title IX coordinator or deputy Title IX coordinator.
- b. Except as provided by Subsection (c), the report must include all information concerning the incident known to the reporting person that is relevant to the investigation and, if applicable, redress of the incident, including whether an alleged victim has expressed a desire for confidentiality in reporting the incident.
- c. A BCM employee designated by the institution as a person with whom students may speak confidentially concerning Title IX Misconduct or who receives information regarding such an incident under circumstances that render the employee's communications confidential or privileged under other law shall, in making a report under this section, state only the type of incident reported and may not include any information that would violate a student's expectation of privacy.
- d. Notwithstanding Subsection (a), a person is not required to make a report under this section concerning: (1) an incident in which the person was a victim of Title IX Misconduct; or (2) an incident of which the person received information due to a disclosure made at a public awareness event regarding Title IX Misconduct sponsored by a BCM or by a student organization affiliated with the institution.
- e. Any person who makes a good faith report of Title IX Misconduct, assists in the investigation of the reported Title IX Misconduct, or testifies in the Live Hearing arising out of such report, may not be subjected to any disciplinary action by BCM for any violation by the person of BCM's code of conduct reasonably related to the incident for which suspension or expulsion from the institution is not a possible punishment. This subsection does not apply to a person who perpetrates or assists in the perpetration of the incident reported.
- f. BCM shall terminate the employment of an employee whom BCM determines in accordance with BCM's disciplinary procedure to have either failed to make a report required by this section or who, with the intent to harm or deceive, knowingly makes a report that is false.

Responsible Employees

All faculty and staff (including resident and fellow physicians and postdoctoral associates) with knowledge of an incident or assertion of Prohibited Conduct committed by or against another employee or enrolled student must promptly report such conduct to the Title IX Coordinator using traditional or anonymous reporting. Reports must include all information concerning the alleged Prohibited Conduct that is known to the responsible employee and relevant to the investigation, including whether the alleged Complainant has expressed a desire for confidentiality in reporting the incident. Responsible employees must inform any reporting individual about their responsibilities under Clery and Title IX prior to accepting the report.

The duty to report is triggered when a faculty or staff member either witnesses an incident of perceived Prohibited Conduct or is informed about an incident of Prohibited Conduct except when the report is made in a patient encounter or provision of medical or mental health services.

For example, during a career-mentoring session, a faculty member receives a verbal report of Prohibited Conduct from a trainee who does not want to report the incident to the BCM Security Office or to any other College office—the faculty member must nevertheless report it to the Title IX Coordinator.

Campus Security Authorities

Administrative Titles	Major Education Roles
Administrator (specific job designations)	Administrator (specific job designations)
Associate General Counsel	Assistant Dean
Assistant Provost	Assistant Program Director
Assistant Vice President	Associate Dean
Associate Director	Associate Clerkship Director
Associate Provost	Associate Course Director
Associate Vice President	Associate Program Director
Center Administrator	Chair
Chief	Clerkship Director
Controller	Co-Chair
Deputy General Counsel	Co-Director
Director	Co-Principal Investigator
Executive Director	Course Co- Director
Executive Assistant	Committee Chair
General Counsel	Committee Vice-Chair
President	Course Director
Provost	Dean

Registrar	Department Elective Co-Director
Senior Associate Director	Department Elective Director
Senior Director	Director
Senior Vice President	Faculty Senate Leaders
Treasurer	Laboratory Mentors
Vice President	Program Co-Director
	Program Director
	Senior Associate Dean
	Subcommittee Chair
	Track Co-Director
	Track Director
	Vice Chair
Total: ~285	Total: ~417

Retaliation

Retaliation is defined as any adverse action threatened or taken against a person, including a Complainant and Reporter, because the individual has filed, supported, or provided information in connection with a reported violation of this Policy or engaged in other legally protected activities. Examples of retaliation include but are not limited to intimidation, threats, and harassment.

BCM will not tolerate Retaliation in response to or in connection with any report of Title IX Misconduct or Prohibited Conduct, and may impose interim or permanent sanctions against individuals who retaliate in violation of this Policy. Any party who believes that they have experienced Retaliation should report the incident immediately to either or both BCM Title IX Coordinators identified in this Policy. Upon notice of alleged Retaliation, the College will take necessary steps to provide a safe learning and working environment, in accordance with this Policy.

Upon notice of alleged retaliation, BCM will take necessary steps to provide a safe academic and working environment. Individuals responsible for retaliation will be met with disciplinary action up to and including potential removal from the BCM community.

Investigation & Adjudication Process

Baylor College of Medicine takes seriously and investigate all reports of Title IX Misconduct and Prohibited Conduct. Reported allegations will be investigated by an impartial process that is prompt, fair, and conducted by College administrators who receive specialized training. Procedurally, when Baylor receives a report of Prohibited Conduct, the Title IX Coordinator is notified. If the Complainant wishes to access local community agencies and/or law enforcement for support, the appropriate College administrator will assist in making these contacts.

BCM reserves the right to provide non-disciplinary, non-punitive individualized services, as reasonably available, to a Complainant and/or the Respondent before or after the filing of a Formal Complaint or where no Formal Complaint has been filed. Such measures are designed to restore or preserve equal access to BCM's Education Program or Activity without unreasonably burdening the Complainant or the Respondent. Measures may include, but are not limited to:

- Counseling;
- Extensions of deadlines or other course-related adjustments without penalty;
- Modifications of work or class schedules, including arranging for a Complainant or Respondent to withdraw from a course without penalty;
- Mutual restrictions on contact between the parties (i.e., mutual no contact order);
- Changes in work, academic, extracurricular or housing locations;
- Leaves of absence;
- Campus escort services and increased security of certain areas of campus; and
- Providing access to counseling, medical and/or academic support services.

BCM will maintain as confidential any supportive measures provided to the Complainant or Respondent to the extent that maintaining such confidentiality would not impair the ability of BCM to provide the supportive measures. To the greatest extent practicable based on the number of counselors employed by the institution, BCM shall ensure that each Complainant, Respondent and Reporter are offered counseling provided by a counselor who does not provide counseling to any other person involved in the incident.

If a Community Member so desires, they will be connected with a counselor on- or off-campus, as well as a community based advocate. No Community Member is required to take advantage of these services and resources; however BCM provides them in the hopes of offering additional help and support. A summary of rights, options, supports, and procedures, in the form of a resource guide for survivors of Sexual Violence, Relationship Violence, and Stalking, is provided to all individuals, whether they are students, employees, guests, or visitors.

When appropriate upon receipt of notice, the Title IX Coordinator will initiate a prompt, fair, and impartial process beginning with an investigation, which may lead to the imposition of sanctions based upon a preponderance of evidence standard (what is more likely than not). This means that the information supporting a finding of responsibility be more convincing than

the information in opposition to it. Individuals alleged to have engaged in Title IX Misconduct or Prohibited Conduct are presumed not to have engaged in the alleged behavior unless or until this standard is met. Full procedures detailing BCM's investigation and adjudication processes can be found in the [Sexual Misconduct and Other Prohibited Conduct Policy](#). The Title IX Coordinator is ultimately responsible for: (1) assuring in all cases that the behavior is brought to an end, (2) that BCM acts to reasonably prevent its recurrence, and (3) the effects on the Complainant and the BCM community are remedied. The Title IX Coordinator is also responsible for assuring that training is conducted annually for all investigators and appeal administrators to ensure a process that protects the safety and privacy of all individuals involved, and promotes accountability.

The investigation and records of the resolution conducted by BCM are maintained confidential to the extent permitted by law. Information may be shared privately internally between administrators who need to know in order to investigate, respond to, accommodate, or protect those involved. Privacy of the records specific to the investigation is maintained in accordance with Texas and federal law. Any public release of information needed to comply with the open crime logs or timely warning provisions of the Clery Act. Additionally, BCM maintains privacy in relation to any accommodations or protective measures afforded to a Complainant or Respondent except to the extent necessary to provide the accommodations and/or protective measures.

BCM expects Complainants, Respondents, Reporters, Advisors, and witnesses to respect the privacy of others who are named in an allegation of Title IX Misconduct or Prohibited Conduct and refrain from disclosing their names to others uninvolved in resolution of the allegation. Disclosures by these persons of the name of a Complainant or Respondent to another person that does not have a legitimate interest in that information may be a lapse in professionalism that could result in corrective or disciplinary action. However, this subsection shall not restrict the ability of either party to discuss the allegations under investigation or to gather and present relevant evidence. In addition, this subsection cannot be construed to prohibit Complainants, Reporters, or Respondents from having private conversations with Advisors, pursuing counseling, attending public awareness events, or reporting alleged Title IX Misconduct or Prohibited Misconduct.

In any report of Dating Violence, Domestic Violence, Sexual Assault, Sexual Exploitation, Sexual Harassment, Sexual Misconduct, or Stalking, Complainants and Respondents are afforded the same opportunities to:

- Receive simultaneous written notice of the initiation and conclusion of an investigation, the investigation findings, recommended sanctions (if applicable), appeal procedures, any changes to sanctions, and when the results become final;
- Have the option to have a support person present throughout the process and during any proceedings related to the investigation and/or adjudication of a complaint.

Both Title IX and the Clery Act provide protections for individuals who report, in good faith, allegations of non-compliance with the Clery Act and/or Title IX to the attention of appropriate College administrators. Baylor College of Medicine will not tolerate acts of retaliation in

response to or in connection with any report or investigation of Dating Violence, Domestic Violence, Sexual Assault, Sexual Exploitation, Sexual Harassment, Sexual Misconduct, or Stalking. Any individual who believes that he/she has experienced acts of retaliation should report these incidents immediately to the Title IX Coordinator, Deputy Coordinator, and/or to officials of the U.S. Department of Education.

Sanctions, Protective Measures, and Remedies

A BCM community member found responsible for engaging in Title IX Misconduct or Prohibited Conduct shall be disciplined up to and including removal from the community. Any one or more of the following sanctions, depending on the severity of the reported incident and consideration of any previous policy violations:

- Respondents found to have engaged in Sexual Assault will be removed from the BCM community.
- Respondents who are found to have engaged in other Title IX Misconduct or Prohibited Conduct may face one or more of the following sanctions, depending on the severity of the reported incident and consideration of any previous policy violations:
 - Mandatory educational programs (e.g., sexual harassment education seminar);
 - Mandatory training programs (e.g., sensitivity training);
 - Issuance of a No Contact Order;
 - School and/or program-specific disciplinary action, such as:
 - Formal Warnings,
 - Professionalism citation,
 - Adverse Actions, e.g., probation, suspension, non-reappointment, failure to promote, dismissal;
 - Administrative leave of absence;
 - Restriction(s) on or removal from a work, academic, or extracurricular activity, duty, or environment;
 - Employment-specific disciplinary action, such as:
 - Verbal or written warning,
 - Probation, and
 - Termination of employment

BCM may impose other remedies to protect individuals from further harm.

- Relocation of work, academic, or extracurricular activities.
- Arranging for a Complainant or Respondent to have the ability to make-up lost work or academic progress without penalty.
- Arranging for a Complainant or Respondent to withdraw from a course without penalty.
- Providing access to counseling, medical and/or academic support services.
- Educational programs or trainings for Baylor community members.

Registry of Offenders

In Texas, all sex offenders are required to register within the state and to provide notice of each institution of higher education in Texas at which the person is employed, carries out a vocation, or is an enrolled student. Baylor College of Medicine periodically receives information concerning known sex offenders via this requirement and may disseminate information to protect the safety and well-being of BCM community. The Office of Human Resources checks this list against information at BCM to determine if any known registered sex offenders are associated with BCM as a community member. A list of current sex offenders, if any, associated with BCM is maintained by the Baylor Security Office. Individual interested in accessing the sex offender registry can do so by visiting the Texas Department of Public Safety [website](#).

Prevention and Education Programs

Baylor College of Medicine values the ideal of **Respect** and demonstrates its commitment by offering programming to assist community members in identifying and preventing Dating Violence, Domestic Violence, Sexual Assault (including stranger and known offender assaults), and Stalking each year. Educational programs offered to all new students and new employees are often conducted during new student and new employee orientation. Programs and other campaigns offered throughout the year to all students and employees include strong messages regarding not just awareness, but also primary prevention (including normative messaging, environmental management, and bystander intervention), discuss institutional policies on Prohibited Conduct, as well as the institutional definitions of Dating Violence, Domestic Violence, Sexual Assault, Sexual Harassment, Sexual Misconduct, Stalking, and Consent in reference to sexual activity. Additionally, programs and resources offer information on risk reduction, how to recognize warning signals, and how to avoid potential attacks without victim-blaming approaches.

Bystander engagement is encouraged through safe and positive intervention techniques and by empowering third-party intervention and prevention such as calling for help, using intervention-based apps, identifying allies, and/or creating distractions. Bystander empowerment training highlights the need for those who intervene to ensure their own safety in the intervention techniques they choose, and motivates them to intervene as stakeholders in the safety of the community when others might choose to be bystanders.

The prevention and education programs selected by Baylor College of Medicine are informed by evidence-based research and/or are assessed for their effectiveness. The programs that may be offered throughout the year are described in the following table.

Target Audience	Prevention/Education Initiative	Time Period	Summary	Communication Method
New Students (DNP, MSOP, PA, SOM, GSBS)	CampusClarity - Think About It: Adult Learner	January, June, July, August	Comprehensive training on what constitutes sexual misconduct, from verbal sexual harassment to sexual violence, and	Notification of required training included in pre-matriculation messaging distributed by School/Program

			includes information and interactive scenarios aimed at ensuring graduate students/adult learners know how to identify, intervene as a positive bystander, and report incidents of sexual misconduct to campus security authorities.	administrator. Communication Team developed language for invitation email and reminders to be sent via CampusClarity.
New Students (DNP, MSOP, PA, SOM, GSBS)	Title IX Presentation during Orientation	January, June, July, August	In person presentation on BCM specific information: definitions, reporting options, policy.	Presentation included on orientation schedule.
Visiting Students (SOM)	CampusClarity - Think About It: Adult Learner	On going/ Monthly	Comprehensive training on what constitutes sexual misconduct, from verbal sexual harassment to sexual violence, and includes information and interactive scenarios aimed at ensuring graduate students/adult learners know how to identify, intervene as a positive bystander, and report incidents of sexual misconduct to campus security authorities.	Notification of required training included in pre-arrival messaging distributed by Office of the Registrar. Communication Team developed language for invitation email and reminders to be sent via CampusClarity.
Summer Program Students (SMART, HPA-JAMP, MED Summer Surgery)	Title IX Presentation during Orientation	May, June		Presentation included on orientation schedule.
Current Students	CampusClarity - Think About It: Adult Learner	---	Comprehensive training on what constitutes sexual misconduct, from verbal sexual harassment to sexual violence, and includes information and interactive scenarios aimed at ensuring graduate students/adult	Notification of required training sent to distribution lists in each School/Program by Dean or designated administrator and posted in Student Commons. Communication Team

			learners know how to identify, intervene as a positive bystander, and report incidents of sexual misconduct to campus security authorities.	developed language for invitation email and reminders. Distribution via email lists and CampusClarity.
New Residents /Fellows(GME)	LawRoom – Bridges: Building a Supportive Community	May	Comprehensive training on what constitutes sexual misconduct, from verbal sexual harassment to sexual violence, and includes information and interactive scenarios aimed at ensuring employees know how to identify and report incidents of sexual misconduct to campus security authorities so that schools take prompt and appropriate action.	Notification of required training included in pre-matriculation messaging distributed by GME. Communication Team to develop language for invitation email and reminders to be sent via LawRoom.
New Residents/ Fellows (GME)	Title IX Presentation during Orientation	July	In person presentation on BCM specific information: definitions, reporting options, policy.	Presentation included on orientation schedule.
New Employees (including Post-Doctoral Trainees)	LawRoom – Bridges: Building a Supportive Community	Weekly, On going	Comprehensive training on what constitutes sexual misconduct, from verbal sexual harassment to sexual violence, and includes information and interactive scenarios aimed at ensuring employees know how to identify and report incidents of sexual misconduct to campus security authorities so that schools take prompt and appropriate action.	Notification of required training included in orientation messaging distributed by YouFirst Team (HR). Title IX Coordinator developed language for invitation email and reminders to be sent via LawRoom.
New Managers Training (HR)	Title IX Presentation during New Managers training session.	On going	In person presentation on BCM specific information: definitions, reporting options, policy, institutional	Presentation included on orientation schedule.

			responsibilities, role as a Responsible Employee.	
New Faculty Training (HR)	Title IX Presentation during New Faculty training session.	On going	In person presentation on BCM specific information: definitions, reporting options, policy, institutional responsibilities, role as a Responsible Employee.	Presentation included on orientation schedule.
Current Employees	LawRoom - Bridges: Building a Supportive Community	---	Comprehensive training on what constitutes sexual misconduct, from verbal sexual harassment to sexual violence, and includes information and interactive scenarios aimed at ensuring employees know how to identify and report incidents of sexual misconduct to campus security authorities so that schools take prompt and appropriate action.	Notification of required training sent to distribution lists for Department Head/leadership. Announcement of training via Faculty Commons and Newslink. Communication Team to developed language for notification, announcement, invitation email and reminders. Distribution via lists and LawRoom.
Responsible Employees (REs)	LawRoom - Bridges: Building a Supportive Community	Annually	A review of important Title IX and Clery Act requirements related to responsible employee obligations, confidentiality, retaliation, and reporting. Includes interactive scenarios, explores the intricacies of bystander interventions and the unexpected challenges of inadvertent reports of sexual misconduct.	Notification of required training sent to distribution lists for Department Head/leadership and REs. <i>Message title- Complete Mandatory Training</i> Email to targeted distribution lists announcing training. Communication Team will develop language for announcement, invitation emails, and reminders. Distribution via email lists and LawRoom.
Campus Security Authorities	LawRoom: Clery Basics	Annually	Information on the Clery Act reporting requirements, designated employees duty to report	<i>Message title- Complete Mandatory Training</i> Email to targeted

(CSAs)			relevant information to the proper campus authorities, and interactive scenarios to raises awareness of the important role CSAs play in the institution's legal compliance.	distribution lists announcing training. Communication Team will develop language for announcement, invitation emails, and reminders. Distribution via email lists and LawRoom.
All Community Members	Stalking Awareness	January	Information on the definition of stalking, examples of stalking behavior, the impact of stalking on victims, reporting and reduction techniques.	Title IX Coordinator to develop messages and graphics. Communication Team will distribute via electronic newsletters (Newslink, Faculty Commons, Student Commons), and graphics on screens. Title IX website included in all announcements.
All Community Members	Healthy Relationships	February	Information on the signs of an abusive relationship, statistics on men as victims of relationship violence, how to report and resources.	Title IX Coordinator to develop messages and graphics. Communication Team will distribute via electronic newsletters (Newslink, Faculty Commons, Student Commons), and graphics on screens. Title IX website included in all announcements.
All Community Members	Sexual Assault Awareness	April	Information on the definition of sexual assault, myths, risk reduction techniques, reporting and resources.	Title IX Coordinator to develop messages and graphics. Communication Team will distribute via electronic newsletters (Newslink, Faculty Commons, Student Commons), and graphics on screens. Title IX website included in all announcements.
All Community Members	Pride Month (LGBT+)	June	Messaging supporting inclusivity and resources.	Title IX Coordinator to develop messages and graphics. Communication

				Team will distribute via electronic newsletters (Newslink, Faculty Commons, Student Commons), and graphics on screens. Title IX website included in all announcements.
All Community Members	Domestic Violence Awareness	October	Community participation in Texas Go Purple Day, information on the definition of domestic violence, myths, reporting and resources.	Title IX Coordinator to develop messages and graphics. Communication Team will distribute via electronic newsletters (Newslink, Faculty Commons, Student Commons), and graphics on screens. Title IX website included in all announcements.
All Community Members	Coming Out Day	October	Messaging supporting inclusivity and resources.	Title IX Coordinator to develop messages and graphics. Communication Team will distribute via electronic newsletters (Newslink, Faculty Commons, Student Commons), and graphics on screens. Title IX website included in all announcements.
All Community Members	Holiday Party Risk Reduction	December	Information on risk reduction techniques, safety tips, reporting and resources.	Title IX Coordinator to develop messages and graphics. Communication Team will distribute via electronic newsletters (Newslink, Faculty Commons, Student Commons), and graphics on screens. Title IX website included in all announcements.
All Community Members	Title IX Website www.bcm.edu/titleix	On going	Provides education, prevention, risk reduction techniques, access to reporting avenues, a	Inclusion of website on all announcements and graphics.

			comprehensive list of community resources, and the Baylor policy.	
Various	Presentations/trainings to groups on specific topics	On going	Community members can request a presentation or training session on specific Title IX related topics.	Notification of presentation distributed by area administrator.
Various	Current events	Various	Maximize prevention/ education on a specific topic by connecting to a current event or occurrence.	Title IX Coordinator to develop messages and graphics (if appropriate). Communication Team will distribute via electronic newsletters (Newslink, Faculty Commons, Student Commons), and graphics on screens (If appropriate). Title IX website included in all announcements.

Clery Act Crime Definitions

- **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. Simple assaults are excluded.
- **Arson**—Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property of another, etc. Arson statistics are not included in this table-building tool.
- **Burglary (breaking or entering)**—The unlawful entry of a structure to commit a felony or a theft. Attempted forcible entry is included.
- **Consent**—The agreement to engage in specific sexual contact, which may be given by verbal agreement or active and willing participation in the sexual activity. Consent to sexual contact or any specific sexual act cannot be given if an individual is incapacitated or impaired because of physical or mental condition or the ingestion of drugs or alcohol, or under the age of seventeen (17). Silence, previous sexual relationships, current relationships, or the use of alcohol and/or drugs is not an indication of consent. The use of force, threat of force, threat of immediate or future harm, or use of physical intimidation to secure compliance with sexual activity is evidence of a lack of consent. Consent may initially be given, but it may be revoked at any point, either verbally, through physical resistance, or by losing consciousness. Failure to cease sexual contact promptly in response to a withdrawal of consent constitutes prohibited nonconsensual sexual contact. “No” or another negative statement or acts/physical gestures supporting the desire to cease contact in response to sexual contact or an invitation to sexual contact will be regarded as a denial of consent in such sexual contact.
- **Criminal Homicide**—(a) Murder and non-negligent manslaughter: the willful (non-negligent) killing of one human being by another. Deaths caused by negligence, attempts to kill, assaults to kill, suicides, and accidental deaths are excluded. The Clery Act classifies justifiable homicides separately and limits the definition to: (1) the killing of a felon by a law enforcement officer in the line of duty; or (2) the killing of a felon, during the commission of a felony, by a private citizen. (b) Manslaughter by negligence: the killing of another person through gross negligence. Deaths of persons due to their own negligence, accidental deaths not resulting from gross negligence, and traffic fatalities are not included in the category Manslaughter by Negligence.
- **Dating Violence**—Any act of violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based on the victim’s statement and with consideration of the type and length of the relationship. Two people may be in a romantic or intimate relationship, regardless of whether the relationship is sexual in nature; however, neither a casual acquaintance nor ordinary fraternization between two individuals in a business or social context shall constitute a romantic or intimate relationship. This definition does not include acts covered under domestic violence.
- **Domestic Violence**—Any violent felony or misdemeanor crime committed by a current or former spouse or intimate partner of the victim, a person sharing a child with the victim, or a person cohabitating with the victim as a spouse or intimate partner.

- **Drug Abuse Violations**—The violation of laws prohibiting the production, distribution, and/or use of certain controlled substances. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation, or importation of any controlled drug or narcotic substance.
- **Hate Crime**—Crime of aggravated assault, arson, burglary, criminal homicide, motor vehicle theft, robbery, sex offenses, and/or crime involving bodily injury in which the victim was intentionally selected because of the victim's actual or perceived race, gender, religion, sexual orientation, ethnicity, or disability.
- **Larceny-theft (except motor vehicle theft)**—The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another. Examples are thefts of bicycles, motor vehicle parts and accessories, shoplifting, pocketpicking, or the stealing of any property or article that is not taken by force and violence or by fraud.
- **Liquor laws**—The violation of state or local laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, or use of alcoholic beverages, not including driving under the influence and drunkenness.
- **Motor vehicle theft**—The theft or attempted theft of a motor vehicle. A motor vehicle is self-propelled and runs on land surface and not on rails. Motorboats, construction equipment, airplanes, and farming equipment are specifically excluded from this category.
- **Robbery**—The 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.
- **Sex Offenses**
 - **Fondling**- The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.
 - **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. The carnal knowledge of a person, forcibly and/or against the that person's will; or not forcibly or against the person's will where the victim is incapable of giving consent because of his/her temporary or permanent mental or physical incapacity (or because of his/her age).
 - **Incest**- Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
 - **Statutory Rape**- Sexual intercourse with a person who is under the statutory age of consent.
- **Stalking**—Intentionally engaging in a course of conduct, directed at a specific person, which is likely to cause a reasonable person to fear for his or her safety or the safety of others or cause that person to suffer substantial emotional damage. Examples include but are not limited to, repeatedly following such persons(s), repeatedly committing acts that alarm, cause fear, or seriously annoy such other person(s) and that serve no

legitimate purpose, and repeatedly communicating by any means, including electronic means, with such person(s) in a manner likely to intimidate, annoy, or alarm him or her.

- **Weapons**—violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices, or other deadly weapons.

Baylor College of Medicine Crime Statistics

Reporting the Annual Disclosure of Crime Statistics

The Clery Act establishes the requirements for collecting and reporting campus crime statistics. The classifications of crimes used in these reports are defined in the Federal Bureau of Investigation Unified Crime Reports Reporting Handbook and/or the UCR Reporting Handbook: NIBRIS edition (UCR). The BCM Security Department prepares the following report based on information reported to the Security Department and to the Houston Police Department. The following is the report of statistics for calendar years 2018 through 2020. The statistics reported here are provided to the campus community and also to the U.S. Department of Education (DOE) as required by the Clery Act.

BCM sends an email to every enrolled student and current employee on an annual basis which includes a brief summary of the contents of this report and the address for the website where the Annual Security Report can be found online. BCM also submits the annual crime statistics published in this report to the (DOE). The statistical information gathered by the DOE is available to the public through the DOE website.

Clery Geography

On-Campus – means all property, including: on-campus housing facilities (BCM does not have on-campus housing facilities); owned or controlled by an institution within the same reasonably contiguous geographical area and used by the institution in direct support of, or in a manner related to, institutional educational purposes, including residence halls; and any building or property within the same reasonably contiguous geographic area of the institution that is owned by the institution but controlled by another person, is used by students and supports institutional purposes (such as a food or other retail vendor).

Non-Campus – means any building or property owned or controlled by a student organization that is officially recognized by the institution; or any building or property owned or controlled by an institution that is being used in direct support of, or in relation to, the institution's educational purposes, is frequented by students and is not within the same reasonably contiguous geographic area of the institution.

Public Property – means all public property, including thoroughfares, streets, sidewalks and parking facilities, that is within the campus or immediately adjacent to and accessible from the campus. The Clery Act does not require disclosure of crime statistics for public property that surrounds non-campus buildings or property.

Criminal Offenses and Statistics

The following statistics include all incidents reported to the BCM Security Department and the Houston Police Department (HPD). Crime statistics obtained from HPD may include crimes that were reported in areas that are not considered Clery Geography as defined by the Clery Act. However, BCM has chosen to report such incidents due to their proximity in location to BCM's Clery Geography, which includes clinics and offices in and around the TMC.

Type of Offense	Year	On campus	Non-campus bldg. or property	Public property
Murder & non-negligent manslaughter	2018	0	0	0
	2019	0	0	0
	2020	0	0	0
Negligent manslaughter	2018	0	0	0
	2019	0	0	0
	2020	0	0	0
Sex offenses: forcible	2018	0	0	0
	2019	0	0	0
	2020	0	0	0
Sex offenses: nonforcible	2018	0	0	0
	2019	0	0	0
	2020	0	0	1
Robbery	2018	0	0	0
	2019	0	0	0
	2020	0	0	0
Aggravated assault	2018	0	0	0
	2019	3	0	1
	2020	0	0	0
Burglary	2018	2	0	0
	2019	0	0	0
	2020	0	0	0
Motor vehicle theft	2018	0	0	0
	2019	0	0	0
	2020	0	0	0
Arson	2018	0	0	0
	2019	0	0	0
	2020	0	0	0
Dating violence	2018	0	0	0
	2019	0	0	0
	2020	0	0	0
Domestic Violence	2018	0	0	0
	2019	0	0	0
	2020	0	0	0
Stalking	2018	0	0	0
	2019	0	0	0
	2020	0	0	0
Liquor law violations	2018	0	0	0
	2019	0	0	0
	2020	0	0	0
Drug law violations	2018	0	0	0
	2019	0	0	0

	2020	0	0	0
Weapons law violations	2018	0	0	0
	2019	0	0	0
	2020	0	0	0

Hate Crimes

There were no reported hate crimes for 2018, 2019, or 2020.

Baylor College of Medicine Code of Conduct

Every member of the BCM community shares in the responsibility for sustaining the highest ethical standards in alignment with BCM’s Mission, Vision and Values. We are individually and collectively accountable for our conduct and compliance with laws, regulations and BCM policies. The BCM Code of Conduct is our comprehensive framework for professional and ethical standards. It is designed to ensure that we, all members of the BCM community, understand the expectations to conduct ourselves in an ethical and professional manner while complying with all laws, regulations, rules, and policies to the fullest degree. Refer to this link to obtain detailed information about BCM’s Code of Conduct. <https://mediasrc.bcm.edu/documents/2015/94/bcm-code-of-conduct-final-june-2015.pdf>

Statement of Student Rights

Baylor College of Medicine is committed to creating an environment for students that is conducive to academic success and academic freedom commensurate with all applicable laws and regulations. As students are not only members of the BCM academic community but are also members of society as a whole, BCM works to ensure that all rights, protections, and guarantees that students are assured as citizens of society are also provided to them within BCM

BCM’s Statement of Student Rights aligns with BCM’s mission as a health sciences university that creates knowledge and applies science and discoveries to further education, healthcare and community service locally and globally. These rights embody our values of respect, integrity, innovation, teamwork and excellence, our vision to improve health through science, scholarship and innovation and our adherence to the Institutional Code of Conduct.

Students have the right to freedom of expression within an atmosphere of culturally responsive inclusiveness and sensitivity. The free dissemination of ideas is key to promoting the academic, personal and professional growth of BCM students.

Students have the right to a safe learning environment that is free of discrimination, violence and harassment. BCM seeks to provide a community of respect, open communication, collaboration and inclusiveness.

Students have the right to due process in incidents of alleged student misconduct and have the right to appeal decisions in this regard. BCM strives to guarantee accuracy in academic results and decisions.

Students have the right to confidentiality of education records. Explicit written confidentiality policies and procedures are in place to achieve the protection of all personal information and academic records. <https://www.bcm.edu/education/academic-faculty-affairs/academic-policies/statement-student-rights>