OFF-CAMPUS ENGAGEMENT POLICY Original Effective Date: August 20, 2019

I. INTRODUCTION

Connecticut College (the "College") recognizes that provision of off-campus activities enhance the academic and co-curricular learning environment. It also recognizes that off-campus activities may pose additional responsibilities and risks to participants, as well as to the College. The purpose of this Off-Campus Engagement Policy is to gather in one place the College's policies that are intended to increase the safety of and minimize the risks related to off-campus activities that are sponsored or supported by the College. Also, attached are the relevant consent forms and acknowledgement, waiver and release forms that are to be used for the various types of off-campus programs and activities. This Policy covers both domestic and international programs and activities.

This Policy focuses on off-campus programs and activities that the College sponsors or supports in some significant way – generally by providing academic credit for the program or activity or providing funding to participants. There are many other off-campus opportunities that students arrange for themselves, which the College does not control, supervise, or fund and for which the College is not responsible. Students may discuss such opportunities with College faculty or officials, and in those circumstances the students should be advised that they are responsible for evaluating the quality, safety, and risks of programs and activities for which the College is not responsible.

This Policy is not intended to displace other College policies, including but not limited to the College's non-discrimination policies, Title IX policies, and the student Honor Code, which continue to apply to College faculty, staff, and students while they are participating in both domestic and international off-campus programs.

All College administrators, faculty, staff and students are expected to adhere to this Policy. Any exceptions to this Policy must be approved in advance by a senior administrator. Non-compliance with this Policy could expose individuals to personal liability. Non-compliance with this Policy can also jeopardize requests for funding or expense reimbursement and can result in disciplinary action.

THE SPECTRUM OF RISKS

There is a wide range of possible risks associated with travel to and participation in offcampus programs and activities, including the risk of bodily injury and loss of personal property of participating students, staff, faculty, and volunteers, as well as possible injury or loss or property of the College or third parties. Those considering off-campus programs and activities sponsored or supported by the College should be advised of the possible risks so they can make an informed decision whether to participate. The list below some of the specific risks and includes academic and non-academic activities:

Participants' Potential Risks include:

- Bodily injury, disease, death or other harm (including loss of or damage to personal property), and attendant medical costs, related to travel (trains, planes, buses, automobiles, other), facilities (slips, falls, fire), physical activity (academic, athletic, recreational), crimes (assault, theft, rape, murder), environmental exposures (disease, weather) and cultural/political/legal exposures (war, arrest, imprisonment, drugs/alcohol, harassment)
- Legal costs, arrest, detention
- Lack of or inaccessibility of quality medical care
- Costs of repatriation or medical evacuation
- Loss of travel papers, passport, visas
- Cultural, political, legal and environmental conditions, including program cancellation

Potential Institutional Risks include:

- Loss caused by bodily injury, disease, death or other harm (including property damage) to third parties (including participants) for which the institution may be legally liable, arising from the trip or travel
- Loss of or damage to property owned by the institution
- Loss of reputation
- Fines, fees or other regulatory sanctions or penalties for failure to comply with federal, state, or local regulatory requirements
- Costs of repatriation or medical evacuation

International Travel has special risks and therefore special protocols, as indicated in Part C below.

II. BASIC REQUIREMENTS FOR DIFFERENT TYPES OF OFF-CAMPUS PROGRAMS

A. Off-Campus Experiential Learning (Internships and Community Learning Placements)

1. Non-Sponsored Off-Campus Experiential Learning

Certain off-campus experiential learning programs are not College sponsored or supported. The host institution is responsible to pay student wages (if it is a paid internship), supervise the student's work and activities, and assume responsibility for the student while the student is on the host institution's premises, as for any other employee.

Some internships and community learning placements are posted on electronic bulletin boards (e.g., internships.com, indeed.com, idealist.org) which the College does not control. By providing such bulletin boards and permitting such postings, the College is not arranging, evaluating, approving, or supporting these posted internships or community learning placements for the student. Students who arrange such experiences without receiving financial support from the College and without reasonably anticipated academic credit from the College are not "sponsored" by the College. The College does not assume any liability for such non-sponsored internships and community learning placements; students participating in non-sponsored internships and community learning placements are not eligible to be covered by College insurance.

2. Sponsored Off-Campus Experiential Learning

Off-campus experiential learning includes sponsored internships and community learning placements (course-based and non-course-based). The College considers off-campus experiential learning at a third-party organization or company ("host") to be "College sponsored" when they meet one of the following criteria:

- a. The Experiential Learning fulfills the College degree requirements or center certificate requirement, or academic credit is awarded for the internship or placement.
- b. The College pays the student a stipend or wages. This criterion only applies if the College, rather than the host institution, pays the student a stipend or wages. The College may give a student a stipend for the internship or placement if the experience is unpaid or under-paid, typically defined as \$3,000 or less, by the host institution. Stipend amounts will vary and are dependent upon many factors. Students who are given a stipend are NOT considered to be employees of the College unless they are working at the College. If the College pays the student a stipend for an internship or placement at a host institution, the internship or placement is considered to be sponsored by the College and the College's liability insurance policies are likely to cover the student, if required in writing by the host institution or worksite.

In some circumstances, with only approved community service organizations or community learning programs, the student may be paid for services at the host organization through the College's community-based work-study program. In such instances, the student is insured by the College as any other temporary, casual employee or student worker and is considered to be sponsored by the College.

c. The College arranges the off-campus experiential learning

The College may arrange off-campus experiential learning by "matching" students to employers, or it may advise a student to participate in a specific learning experience which may include taking active steps to place the student. Arrangement of an internship or community learning placement is defined by the following characteristics: The College (1) identifies the internship or community learning placement possibility; (2) advises the student regarding the internship or placement opportunity; and (3) takes active steps to enroll or place the student in the internship or community learning placement.

3. Requirements for College-Sponsored Off-Campus Experiential Learning

- a. All students who participate in a sponsored off-campus experiential learning placement are expected to sign a waiver/release.
- b. Students must meet academic and social standing requirements defined by the program to participate in a "College-sponsored" off-campus experiential learning placement. Appeals may be made through the Office of the Dean of the College.
- c. The sponsoring agent or entity at the College is responsible for ensuring that students meet the academic and social standing standards required by the program.
- d. The sponsoring agent or entity at the College must ensure that employers sign an Internship/Off-Campus Experiential Learning Host Agreement and maintain emergency contact information for the students and employers.
- e. The sponsoring agent or entity at the College is responsible for advising students to evaluate the health and safety risks of the off-campus experiential learning sites and establish an emergency response plan including maintaining up-to-date emergency contact information.
- f. Students who are receiving academic credit for off-campus experiential learning as part of a registered course cannot receive payment from the host

organization for the same number of hours stipulated in the off-campus experiential learning agreement.

g. Transportation to and from host sites is the responsibility of the student. Students are responsible to ensure their transportation (whether provided by the host, themselves, or others) is safe and reliable. Students who walk to host sites or take public transportation should take necessary precautions to ensure their health and safety. The College discourages the use of student vehicles to transport people for the host. In the event that students must use personal vehicles or a vehicle provided by the host, it is the responsibility of the host to ensure the driver has adequate insurance, and the appropriate driving licenses. Hosts and students should screen drivers, follow safety precautions, develop and implement procedures for all drivers, ensure all vehicles are safe, and provide guidelines for passenger behavior.

4. Insurance for Students in Off-Campus Experiential Learning

Process for students requesting insurance coverage for sponsored off-campus experiential learning (this may also be called an "Insurance Waiver" by the host).

The Off-Campus Experiential Learning Host Agreement outlines the College's current provision of liability insurance to cover damage or harm caused by a student in an internship or placement in the amount of \$1,000,000 per person, per occurrence, \$3,000,000 in the aggregate. Any additional requests for insurance by the host should be sent via email to ccinsurance@conncoll.edu.

a. Liability insurance

The College will extend its liability insurance to its students at host institutions when students are in a college-sponsored internship or placement. In consideration of the extension of its insurance to the student, the College will require a signed and completed Off-Campus Experiential Learning Host Agreement which includes waivers of liability. Further, the College may not agree to any contract that releases the host institution or company from its liability for its negligence or deliberate acts. All such release requests should be submitted via email to ccinsurance@conncoll.edu for approval; please allow a minimum of two weeks to process your request.

b. Health insurance

All College students are required to carry health insurance; therefore, all students will have health insurance. Students who have graduated and who

have insurance under the College's health insurance plan will be covered only until Aug. 15 of the year in which they graduated; they are responsible for making other arrangements for coverage after that date.

c.Global travel accident and medical evacuation

All students who are traveling on a College-sponsored programs outside of the US are covered by the College's 24/7 global travel assistance and accident and medical evacuation insurance company, On Call International. Students should contact On Call International to review coverages, limitations and exclusions prior to travel. Students who have purchased the College's health insurance are also covered for medical evacuation by that policy.

d. Workers compensation

Unless the student is receiving wages through the College's payroll system or work-study program, the College cannot cover the student under its workers' compensation insurance policy. Gifts, grants and stipends for internships or community learning placements at other institutions or companies are not considered to be wages.

B. College-Sponsored Off-Campus Field Trips and Programs

1. Registration

Domestic programs and field trips must have an identified event coordinator who organizes the event. Students, faculty and staff members of the College are generally eligible to serve as an event coordinator. Prior to each event, the event coordinator plans the event, meets (when appropriate) with a staff or faculty member, conducts an orientation session for event participants, completes the required notification forms, and considers precautionary procedures where necessary. If an emergency occurs during the event, the event coordinator contacts Campus Safety. In turn, Campus Safety notifies the appropriate senior administrator (Dean of the College and Dean of Students for students, Dean of the Faculty for faculty, and Vice President for Finance and Administration for staff).

Trip Information must include:

- Destination(s)/location(s)
- Date(s) and times of travel
- Mode(s)of transportation
- Event coordinator emergency contact information
- Emergency contact information for on-site contact
- Completed General Release and Waiver Liability Forms
- Plan to accommodate students with approved ADA accommodations
- Age and weight appropriate child car seats and booster seats must be available for use for with Children's Program field trip transportation by car, van or bus.

All trip information must be submitted to Campus Safety before participants depart campus for the event.

2. Forms

The event coordinator for field trips and domestic travel off campus should collect from students and other participants:

- a. Information for the Travel Participant List Form. Submit the list to Campus Safety, take a copy with you on the field trip, and retain a copy in the department office.
- b. General Release and Waiver of Liability Form. Retain in department office.
- All participants must sign the Medical Disclosure and Assumption of Risk Statements form. Meet with Student Health Services to review the form

prior to travel, if needed. Take the form with you on the field trip. Destroy all other Medical Disclosure forms and Assumption Risk Statements at the end of the field trip.

3. Hosting College Events at Personal Residences

The guidelines below are intended to assist faculty and staff in understanding risks associated with hosting events at their homes, and to aid in appropriately managing these risks to ensure a safe and successful event:

- 1. The event must be voluntary for students.
- a. Transportation consider how the students will get to your home and make sure that all students who want to attend can get there. If possible, arrange for students to drive a College vehicle with a credentialed driver.
- b. The meal ask students/participants to inform you if they have any allergies to any particular foods well in advance of the meal. Certain allergies, such as nut and shellfish, can have life threatening consequences, so plan your menu accordingly. If you are doing "pot luck," i.e., students/participants are bringing dishes, ask everyone to write down the ingredients on a card so that diners can self-select if they have concerns.
- c. Serving alcohol Alcoholic beverages are prohibited at off-campus events with students.
- d. Pets if you have pets, advise students/participants in advance of the event and understand that some may be unable to attend because of allergies or fears.
- e. Accessibility -- if an event is connected to work at the College, and the faculty/staff who is hosting the event chooses to have the event at their residence or another off-campus location, it should be held at a location that is accessible to all guests (ie., disabled guests can enter the premises, use the bathroom and navigate to the areas that the event will be held).

Discrimination - consider the grouping of students invited and be sure to include everyone in that group, e.g., a class, advisees, research associates, etc. Inviting only selected students (such as inviting only the ones well liked or excluding someone who is disliked) opens the host to possible claims of discrimination if the student is in a protected class (race, color, religion, national origin, sexual orientation, age, or disability).

- f. Personal Liability The College provides insurance for its employees for claims made against them as long as the employee was acting at the direction of the institution or for its benefit and within the scope of the employee's responsibilities. For this reason, it is recommended that faculty and staff advise their department chair or department head of any plans to host a student event at their home and obtain email approval from the department chair/head for the event. The email request to the department chair/head for approval should include:
 - i. Purpose of the event
 - ii. Who will be attending (description of group and estimated attendance)
 - iii. When the event will take place (date/times)
 - iv. Any transportation needs or request
- g. Insurance coverage for accidents if someone slips, falls or is otherwise injured at a personal residence while attending a College event (including while playing games), the host should immediately inform their homeowner's insurance company or agent of the accident and Campus Safety. If the claim exceeds the homeowner's insurance policy limits, and if this is an approved College event, the College insurance may cover losses in excess of their homeowner's policy limits.
- h. Premises Damage / Other Costs any loss or damage that the personal residence or property sustains as a result of the event is the homeowner's responsibility. The College insurance does not protect personal residence/property for property losses including breakage or theft of valuables or any other property damage that might occur in connection with the event.
- i. Avoiding Possible Sexual Harassment Claims it is strongly recommended that faculty and staff do not invite a student to their home if the faculty/staff member and student will be alone together. For the protection of faculty and staff as well as the students, it is recommended that only groups of students be invited to personal residences, preferably no fewer than three students with an arranged group arrival and departure time.
- j. Cancellation medical, weather or another emergency may necessitate a last minute cancellation. Therefore, there should be a request that students "RSVP" for the event with their email address and cell number for last-minute changes. A member of the group may be designated to act as the host's surrogate to notify the attendees of cancellation in the event the host sustains a medical emergency or other emergency.

C. International Travel and Programs

Connecticut College supports faculty and staff in global initiatives and student participation in study abroad programs and internships all over the world for the purpose of international academic engagement, via 3rd party program providers that have established security, safety and emergency protocols or where College faculty are leading a College program, such as a SATA or TRIP. The College strongly discourages travel to countries and/or participation in programs in a region that is subject to a U.S. State Department Travel Warning, Faculty, staff and students wishing to receive College funding and/or credit for participation in an internship (through the Office of Career & Professional Development, or one of the centers for interdisciplinary scholarship, i.e., CISLA, Holleran, etc.) or participate in a study abroad or other educational program in a region under a U.S. State Department Travel Warning level 3 must submit a special Request for Travel that requires a complete description of and justification for their study and travel. For student requests, if approved by the Dean of the College, upon the recommendation of the Study Away Committee, the student and parent(s) will be required to sign a Travel Warning Acknowledgment of Risks and Release of Liability. For faculty and staff requests, if approved by the employee's supervisor, upon the recommendation of the Vice President for Finance and Administration, the faculty and staff will be required to sign a Travel Warning Acknowledgment of Risks and Release of Liability. Travel to a country or region on the level 3 Travel Warning list is not permitted without pre-travel approval and a completed Travel Warning Acknowledgment of Risks and Release of Liability. The College will not approve nor will it fund travel to countries under a Level 4 Travel Warning under any circumstances and without appeal.

1. Registration

International travel must have an identified event coordinator who organizes the event or program. Students, faculty and staff members of the College are eligible to serve as an event coordinator. Prior to each event, the event coordinator plans the event, meets (when appropriate) with a staff or faculty member, conducts a mandatory mandatory orientation session for event participants, completes and collects the required notification forms, shares copies with the sponsoring office, and considers precautionary procedures, where necessary. If an emergency occurs during the event, the event coordinator contacts Campus Safety. In turn, Campus Safety notifies the appropriate senior administrator (Dean of the College for students, Dean of the Faculty for faculty and Vice President for Finance and Administration for staff).

Prior to departure for international travel, individuals should download the emergency contact information for the College's 24/7 global travel assistance and accident and medical evacuation insurance company, On Call International. Also, On Call International can provide international travelers with a pre-trip assessment that outlines security and health considerations for specific areas of travel.

2. Training

 Faculty and staff leading international trips involving students are required to review the training resources provided by the College.

3. Insurance

Travel Accident and Medical Evacuation.

All faculty, staff, students, volunteers who are traveling on a College-sponsored program and spouses, partners or dependents accompanying an employee on a College-sponsored program and are more than 100 miles from their legal residence (usually their home address) are covered by the College's current Travel Accident and Medical Evacuation Insurance.

4. Forms

The event coordinator for international travel off campus should collect from faculty, staff, students and other participants:

- a. Information for the Travel Participant List Form. The event coordinator should submit the list to Campus Safety, take a copy on the trip, and retain a copy in the sponsoring office.
- b. General Release and Waiver of Liability Form. The event coordinator retains a copy of the form in the sponsoring office.
- c. All participants must sign Medical Disclosure and Assumption of Risk Statements from. The event coordinator retains the form and should meet with Student Health Services to review the form prior to travel, take the form on the trip and destroy all Medical Disclosure forms and Assumption Risk Statements at the end of the trip.

5. Other Requirements

- Ensure all participants register with the <u>Smart Traveler Enrollment</u> <u>Program</u> of the U.S. State Department to receive important safety and security messages and make it easier for the U.S. State Department to locate and assist in an emergency.
- 2. For international travel, advise all participants to consult the <u>U.S. State Department's Traveler's Checklist</u> to get information about safety, security, crisis planning, health precautions and other special considerations while traveling abroad.

3. For international travel, be aware that the U.S. Department of the Treasury Office of Foreign Assets Control (OFAC) maintains comprehensive sanctions on certain countries (currently North Korea, Iran, Syria, Cuba, and the Crimea region of Ukraine). As a result of these sanctions, U.S. persons may require OFAC authorization before traveling to these countries. If you intend to travel to a country subject to OFAC sanctions, you must first obtain prior written approval from Vice President for Finance and Administration, Rich Madonna.

III. ADDITIONAL REQUIREMENTS FOR ALL PROGRAMS

A. Pre-trip planning and orientation

The event coordinator for field trips, domestic and international travel off campus, including sponsored internships, must address the following with all participants including faculty, staff and students:

- 1. Written briefing of travel and packing tips, medical and health concerns, modes of transportation, hours of departure and return.
- 2. Written itinerary of activities, destinations and dates/times.
- Written agenda of activities. Written review of foreseeable hazards and safety procedures, emergency preparedness processes, crisis response plan, and emergency communication plans including phone numbers and contacts and alternative communication methods.
- 4. Training for all participants on any equipment to be used on the trip.
- 5. Requests for accessibility-related accommodations.
- 6. Expected conduct of faculty, staff and students regarding such issues as fraternizing, consuming alcohol, activities, and conduct during "free time." Advise participants of the consequences of non-compliance.
- 7. Review and clearly explain alcohol, drug and firearm policy provisions. Drugs and firearms are forbidden at any off-campus event. Underage drinking and alcohol use that lead to disruptive behavior are also forbidden (Please refer to The Honor Code and Student Rights and Responsibilities Handbook for more detailed information. Also refer to the Student Club Handbook) If violations of these policies occur during an off-campus event, the event coordinator(s) should contact Campus Safety for instructions on the appropriate steps to take.

- 8. Background information pertaining to any upcoming cultural "shocks" students may experience.
- 9. Review and clearly explain the required forms. Instruct participants to read and complete the required forms. An enrolled student cannot be denied participation in a class field trip if they refuse to sign the General Release and Waiver of Liability Form. If this occurs, read the General Release and Waiver of Liability Form to them and complete it for them, except for their signature. The event coordinator should note on the agreement that the participant chose not to sign the release, that it was read to them and then sign and date the form and file it with the others.
- 10. Inform participants there is limited accident insurance coverage provided by the College which is available for all students who are injured on campus-sponsored trips outside of the US. This coverage is considered primary, supplemented by any other medical insurance to which the student may have access. The College's global accident insurance may pay covered expenses subject to policy limits and restrictions. Provide information about the resources available from the College's Travel Accident and Medical Evacuation Insurance as well as travel assistance services provided by On Call International.
- 11. Explain that student behavior during an off-campus event is subject to the College's Honor Code/Code of Student Conduct. In the event a participant's conduct becomes unlawful and/or disruptive, the student may be removed from the event if it is practical and safe to do so. Upon return to the campus, the student will be mandated to go through the student conduct process.

Additionally, U.S. export control laws and regulations govern the export and import of certain goods, services, information, and materials between the U.S. and other countries. Items subject to U.S. export and import control laws include items with military applications, items containing high-end technologies, and commercial items (including some fairly common items), as well as software related to those items, and information required for their design, development, production, manufacture, assembly, operation, repair, testing, maintenance, modification, installation, or use. U.S. export control laws have a broad application, and the simple release of information or technical data to a foreign entity or foreign national abroad or in the U.S. through a visual inspection of an item, verbal exchange, by email or exchange of documents, or other means is considered an export, and can constitute an export control violation. Failure to comply with U.S. export control laws can have grave consequences, including civil and criminal penalties. If you intend to travel with items that have military applications or contain high-end technology, or related software or technical

information (including on your laptop or other electronic device), you must obtain prior written approval from the appropriate senior administrator. See also the College's tips on protecting electronic devices while traveling abroad.

Finally, please note that U.S. government regulations also govern the export and import of art, hazardous materials, and animal and plant materials. If you have a question regarding your travel plans or the items you will take with you, please consult the VP for Finance and Administration who can help you determine what requirements, if any, may apply.

Encrypting laptops and other electronic devices is often a way to protect sensitive data; however, many countries, including the U.S., restrict encrypted device from entering the country.

B. Supervision of Participants

To ensure adequate supervision for students involved in off-campus activities, event coordinators should ensure the number of staff or faculty activity leaders for the trip and their competency level are appropriate for the number of students and their range of skill levels and the nature and duration of the activity.

Depending on the nature of the activity and the country in which it takes place, one or more staff or faculty activity leaders should have knowledge of emergency protocols in the location of the activity (local equivalent to 9-1-1).

For sanctioned co-curricular travel done by students without staff or faculty, the sponsoring department or office will serve as event coordinator ensuring that proper protocol has been communicated. At least 1 student must be designated as a contact for the group.

C. Transportation

1. Automobile

The College's Vehicle Use Policy applies to all persons who drive Connecticut College administered (owned or rented) or their personal vehicles on College-related travel. This policy requires any person driving on College-related travel to be an authorized driver and identifies the requirements to become an authorized driver. Also this policy outlines that when using your personal vehicle for College travel, the primary liability coverage shifts from Connecticut College to your personal auto insurance. Your personal auto insurance is the primary payer in the event of a loss. Connecticut College's auto liability insurance is in excess of the employee's personal auto liability insurance. See the Vehicle Use Policy-Student and Vehicle Use Policy-Faculty/Staff posted on CamelWeb.

2. Driving Abroad

Students are not permitted to drive motorized vehicles (including but not limited to scooters, motorbikes, motorcycles and cars) abroad on College business, even if they are credentialed to drive for the College.

Faculty and staff may not drive vehicles in which students are passengers abroad without approved exception from the Vice President for Finance and Administration in advance of departure from the U.S. Faculty and staff who need transportation for students must use public or hired transportation. Faculty and staff renting vehicles for their own transportation while abroad should always purchase vehicle insurance offered by the rental company.

IV. SPECIAL REQUIREMENTS FOR EMERGENCY PLANNING AND RESPONSE

A. Planning for Emergencies in Off-Campus Programs (Domestic or International)

Faculty and staff event coordinators who are coordinating trips away from campus should take reasonable steps to prepare themselves and their students to deal with any situation that may arise. As part of this preparation, the faculty and staff event coordinator should do the following in advance of travel:

- 1. Take reasonable precautions in advance planning, as appropriate for the location and planned activities of the trip, including direct arrangements or contracts with vetted third parties to handle logistics and transportation, housing, and other program elements.
- 2. Orient all participants on trip and location details, reasonable precautions, and trip/program expectations, including cultural norms to expect and respect at the destination(s).
- 3. Have in place appropriate insurance and emergency contact information for all participants. For overseas travel, the College has contracted with a global travel assistance and emergency medical and evacuation insurance company, so contact with On Call International for services under this policy should be included in the planning.
- 4. Provide Campus Safety, the Department Chair and Dean of Faculty Office, Dean of College Office or Dean of Students Office with a detailed itinerary and contact information so that College officials know the whereabouts of the participants and may reach the faculty and staff event coordinator and/or other participants in the group throughout the trip/program, as necessary.

- 5. For international travel, register with the appropriate U.S. embassy abroad and with the <u>Smart Traveler Enrollment Program</u> of the U.S. State Department.
- 6. Before departing for the trip/program, or upon arrival at the destination, locate the nearest hospital and police or other law enforcement station and familiarize yourself with how to contact local first responders. Provide this information to all participants.
- 7. To assist in accounting for all participants in the event of an emergency, have a communication plan to stay in touch with all program participants if one or more of the coordinating faculty and staff have to leave the group to care for one or more participants, or when one or more participants are separated from the group for any reason.

B. General Instructions to Follow in Any Emergency

Each emergency situation will require a unique response specific to the event at hand, which will depend upon an immediate assessment of the situation and the appropriate actions that should be taken under the circumstances. However, there are several key steps that help in assessing any situation, establishing an appropriate course of action, and accounting for all participants.

- 1. Take any immediate actions necessary to protect the safety and/or welfare of all program participants.
- 2. Seek appropriate medical care for any affected participants, as appropriate. In seeking medical assistance on international trips, the 24-hour emergency number provided by the College's global travel assistance and accident and medical evacuation insurance company, On Call International, may be helpful if local resources are not sufficient or readily available. In seeking medical assistance, be prepared to provide health care personnel with the affected participant's medical and insurance information.
- 3. If the situation involves a crime of violence or other potential crimes, contact law enforcement. For international trips, also consult with the College's global travel assistance and accident and medical evacuation insurance company, On Call International, and notify the nearest U.S. embassy or consulate in cases of assault or other crimes of violence.
- 4. Depending on the nature of an emergency, seek assistance as needed from representatives of affiliated or sponsoring programs or institutions, local law enforcement, or other local resources and consult with the College's global travel assistance and accident and medical evacuation insurance company, On Call International, to help manage the situation.

- 5. For international trips, depending on the nature of the emergency, assistance should be sought through the nearest U.S. embassy or consulate so that local resources and/or assistance from the U.S. government can be obtained, as necessary and appropriate.
- 6. Obtain as much information as possible about the exact nature and circumstances of the situation so that you can assess appropriate next steps and/or consult with on site or College campus resources (Campus Safety, Dean of the College for students, Dean of the Faculty for faculty and President for Finance and Administration for staff) about how to move forward.
- 7. As soon as practicable, notify and stay in touch with the College's global travel assistance and accident and medical evacuation insurance company, On Call International, and College officials, as appropriate (Campus Safety, Dean of the College for students, Dean of the Faculty for faculty and Vice President for Finance and Administration for staff), and follow directions from such officials.
- 8. Account for all participants using your communication plan.
- 9. For international trips where medical, political, or natural disaster evacuation may be required or advisable, collaborate with College officials (Campus Safety, Dean of the College for students, Dean of the Faculty for faculty and Vice President for Finance and Administration for staff) and the College's global travel assistance and accident and medical evacuation insurance company, On Call International, as appropriate.

NOTE: If a crime occurs in housing or classroom space leased by the College, report details on the incident to Campus Safety as soon as practicable following the incident or upon return to campus, so that the incident can be accounted for in Campus Security Act compliance statistical reporting.

C. Additional Procedures in the Event of Sexual Harassment, Sexual Assault, Relationship Violence, or Sex-Based Stalking

The <u>College's Title IX policies</u> apply to College students, faculty and staff who are participating in off-campus programs and activities, both domestic and international.

 Seek immediate medical and/or counseling care for the affected individual, as appropriate. Offer to make arrangements for such medical and/or counseling care and/or to accompany the affected individual to and/or from the treating facilities. If you are unable to accompany the individual, arrange for another participant to do so if the individual agrees. College counselors are also available to provide assistance to students upon return campus.

- 2. In cases of sexual assault, instruct the individual to follow basic sexual assault procedures, including not to shower, eat or drink, smoke, douche, change clothes, or anything else that might destroy important physical evidence in the event of a prosecution, and to take precautions to treat sexually transmitted diseases or to prevent pregnancy.
- 3. Clarify with the individual the degree to which the individual wishes to involve law enforcement and/or other authorities.
- 4. Assist the individual in reporting the incident if the individual wishes to do so.
- 5. On international trips, consult with the College's global travel assistance and accident and medical evacuation insurance company, On Call International, inform the individual that the laws and procedures for dealing with sexual assault, relationship violence, or sex-based stalking in the host country may differ from those in the United States and obtain and communicate to the individual as much information as possible about the specific laws that may apply so that the individual can evaluate how to proceed. If both parties involved are U.S. citizens, U.S. laws apply. The U.S. embassy or consulate should be able to clarify the laws of the host country.
- 6. With the individual's knowledge, contact the Dean of Institutional Equity and Inclusion or the Title IX coordinator to report the details of the incident as soon as practicable following the incident.

NOTE: Faculty and staff accompanying students on trips away from campus are designated as responsible employees, and as such, have a duty to report sexual assaults, relationship violence, and sex-based stalking. Reports can be made to the Dean of Institutional Equity and Inclusion or the Title IX coordinator.

D. Additional Procedures in the Event of a Death on a College-Sponsored Trip

- 1. Contact local emergency response.
- 2. If possible, the faculty or staff program director should make a positive identification of the body, unless the participant's family is available to do so.
- Immediately contact Campus Safety who will then notify the appropriate office (i.e. Dean of the College for students, Dean of the Faculty for faculty and Vice President for Finance and Administration for staff).

- 4. If the death occurs abroad, also immediately contact the nearest U.S. embassy, and the College's global travel assistance and accident and medical evacuation insurance company, On Call International, to arrange for repatriation of any remains and communication of relevant information with the decedent's family.
- 5. Limit communication to those immediately involved and avoid social media, until the family and the campus community can be notified through appropriate College personnel on campus and ask others on the trip to do the same.

E. Faculty Program Director Accident or Medical Emergency

If the faculty or staff coordinating the trip/program becomes ill, has an accident, or otherwise becomes unable or unavailable to carry out the duties of the position, another faculty or staff member on the trip, or a student or other participant designee, should immediately contact Campus Safety who will then notify the appropriate office (i.e. Dean of the College for students, Dean of the Faculty for faculty and Vice President for Finance and Administration for staff). During international travel or on an international program, also immediately contact the College's global travel assistance and accident and medical evacuation insurance company, On Call International.

F. Special Measures if Terrorist or Anti-American Threats or Acts Occur on International Trips

- 1. Call the U.S. embassy or consulate at your location for advice on any special precautions that are necessary under the circumstances.
- 2. Meet with the participants and direct them to take any recommended precautions.
- Contact the College's global travel assistance and accident and medical evacuation insurance company, On Call International, and Campus Safety who will then notify the appropriate office (i.e. Dean of the College for students, Dean of the Faculty for faculty and Vice President for Finance and Administration for staff).
- 4. Stay in touch with the nearest embassy or consulate and monitor local conditions to assess whether further precautions become necessary, up to and including evacuation.

G. Contacting the College to Report Whether Your Group Is Affected by an Emergency in Your City/Country

If a major incident has occurred within the country/city you are visiting (act of terrorism, natural disaster, etc.), even if it has not affected your group, please contact Campus Safety who will then notify the appropriate office (i.e. Dean of the College for students, Dean of the Faculty for faculty and Vice President for Finance and Administration for staff) and the College's global travel assistance and accident and medical evacuation insurance company, On Call International, to report any concerns or to confirm that all participants are safe, so that the College will be able to give family members or others who contact the College current information on the safety of the participants.

H. Campus Response to Emergencies during Off-Campus Trips

- 1. The College will convene an appropriate emergency response team on campus to assess and respond to the situation at hand. To the extent practicable and applicable, this emergency response team will reference the applicable processes and procedures set forth in this plan and/or other College policies and procedures in developing their response to the specific emergency situation.
- For international trips, the College may contact the U.S. Department of State, overseas embassies, medical personnel, travel organizations that specialize in emergency situations, security staff, international aid agencies, as appropriate, and the College's global travel assistance and accident and medical evacuation insurance company, On Call International.
- 3. The College's emergency response team will develop and assist faculty/staff program personnel and participants in implementing an appropriate course of action based on the information provided and on the assistance needed.

I. Criteria/Factors to Consider for Suspending/Cancelling a Program

The College will consider various factors, which may include some or all of the following, in deciding whether to suspend or cancel an international or domestic program:

- 1. Partner institution, trip provider, or program director's recommendation of suspension or cancellation;
- 2. Travel warning and/or specific directive by the U.S. Department of State and/or U.S. Embassy/Consulate;
- 3. Travel warning and/or specific directive by the World Health Organization and/or the U.S. Center for Disease Control:
- 4. Outbreak of hostilities between the U.S. and the host country;

- 5. Terrorist activities and/or a declaration of martial law in the host city or country;
- 6. Civil unrest or violence that poses a significant threat to participant safety and security;
- 7. Declaration of war by a third country against the host country;
- 8. Protracted or indefinite closure of participating academic institutions, trip providers, lodging sites, or other vital program resources;
- 9. Inability of the program director to carry out the program at the host location or an alternative location; or
- 10. Prolonged disruption of public utilities and/or other services at the host institution, site, or country.

J. Evacuation

In some cases (such as a terrorist attack or natural disaster in the immediate vicinity of the program site), it may be necessary to consider evacuating participants from the program site or host country. As a situation unfolds, in order to develop an action plan, the program director and trip provider or host institution representative, together with the College's Emergency Response Team, will assess the nature and extent of the situation, and evaluate the risks to safety and security of participants, including:

- The incident's proximity to the program site; its impact on the availability of housing, food, water and medical supplies; the protection of law and order; the intensity of military presence in the program area; and (if political) the target of the unrest;
- 2. Consultations with local law enforcement, health officials, and other first responders on feasibility of continuing program activities and the ability of participants and faculty/staff to relocate the program to a different site.
- Consultations with the U.S. Embassy or Consulate personnel on feasibility of continuing program activities and the ability of participants and faculty/staff to relocate the program to a different site in the host country;
- 4. Consultations with the U.S. State Department's Office of American Citizens Services and Crisis Management (+1-202-501-4444 from overseas and 1-888-407-4747 from U.S. and Canada) and with the Overseas Security Advisory Council (202-309-5056; osacemergency@state.gov) and local

- experts in the country about crisis or security concerns in the area and any measures that the U.S. is taking to evacuate its citizens from the host country;
- Consultations with the College's global travel assistance and accident and medical evacuation insurance company, On Call International, and broker/risk consultant regarding the necessity of evacuation and options for emergency evacuation routes and action plans.

V. APPLICATION/EXCEPTIONS TO THIS POLICY

All College administrators, faculty, staff and students are expected to adhere to this Policy. Any exceptions to this Policy must be approved in advance by a senior administrator. Non-compliance with this Policy could expose individuals to personal liability. Non-compliance with this policy can also jeopardize requests for funding or expense reimbursement and result in disciplinary action relevant to faculty and staff procedures.