

MGH Institute of Health Professions



In Partnership with MGH Police Security and
Outside Services

2020-2021 Annual Security Report For Students and Employees Prospective Students and Employees

A Guide to Institute & MGH Policies and Programs Concerning:

- Campus Safety
- Sensitive Crimes
- Drug Free Campus & Workplace Programs

<http://www.mghihp.edu>

Office of Campus Services

MGH Institute of Health Professions

Charlestown Navy Yard, One Constitution Wharf, Boston, MA 02129 (617) 724-0463

<http://www.massgeneral.org/police>

Massachusetts General Hospital, Police, Security, and Outside Services

Charlestown Navy Yard, Building 149 13th Street

WAC 232, 55 Fruit Street, Boston, MA 02114, (617) 726-2121

www.mghihp.edu/safetyreport

Published in 2021

Message From The President

The MGH Institute of Health Professions (Institute) is an academic affiliate of Massachusetts General Hospital (MGH) and a member of Mass General Brigham (MGB) health system. The Institute utilizes resources and services from MGB and MGH to support our academic and work environment. We utilize the resources and services of the MGH Police, Security and Outside Services to promote a safe learning and work environment for students and employees. Through this partnership the Institute develops and disseminates information and reports on safety, sensitive crimes and drug free campus and workplace resources.

Through this process, the Institute complies with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act and the Drug-Free Schools and Communities Act.

The information contained within this document has been developed collaboratively by staffs of the Institute, MGH Police, Security and Outside Services and Mass General Brigham Office of General Counsel. It covers information on the Institute campus.

We are all committed to providing a safe learning and work environment and information on available resources for students and employees should the need arise.

If you have any questions or comments about the information provided, please contact the Chief Operating Officer, Mr. Denis Stratford at dgstratford@mghihp.edu

Sincerely,



President and John Hilton Knowles Professor

Message From The Executive Director, Police, Security and Outside Services

The MGH Institute of Health Professions (IHP) is a vital and integral member of the MGH community and the Charleston Navy Yard Campus. The MGH Police, Security and Outside Services Department undertakes the duty of ensuring the safety and protection of the IHP.

The MGH Police, Security and Outside Services Department goal is to competently, equitably, and compassionately serve and protect the IHP and MGH community, and to contribute to its mission, values, and principles. We accomplish this goal by hiring a highly trained and diverse staff, implementing cutting edge technology designed to mitigate risk, enacting clear and concise policies and procedures, and offering extensive training and awareness programs customizable to meet any of your needs. We maintain a focus on risk reduction and asset protection while highlighting our customer service functions.

MGH and IHP has a comprehensive workplace conflict and violence prevention program, which begins with leadership commitment to a safe environment to analysis of workplace violence trends to continual program evaluations. Integral to our program's success is safety training. We offer a wider variety of trainings that not only educate but will empower you. These training include Management of Aggressive Behavior©, behavior analysis, Active Shooter Response, and many customized training programs to meet you needs.

We look forward to the upcoming year and commit to providing you with a safe and secure environment. We endeavor to minimize risks and remain fluid and flexible in our ability to respond and manage the myriad of challenges we may be presented with.

We ask that you continue to communicate your needs to us along with your suggestions and any risks you feel exist at the IHP and MGH. Your input and experiences are critical to everyone's security and success. Collaboration is the key to ensuring a safe community for all.

Respectfully submitted,



Bonnie S. Michelman, CPP, CHPA
Executive Director, Police, Security and Outside Services
Mass General Brigham Security Consultant

TABLE OF CONTENTS

CAMPUS SAFETY	
What is the Jeanne Clery Act?	6
What is the Annual Security Report?	7
What is the Violence Against Women Reauthorization Act & Campus SaVE Act?	7
Sexual Harassment Policy	7
Mission Statement of MGH Police, Security and Outside Services	8
Philosophy	8
Who We Are	8
Photo Identification Policy	9
Access to Facilities	9
Developing Information for This Report	
Crime Statistics	10
Daily Crime Log	10
Preparation of Disclosure of Crime Statistics	10
Definitions of Reportable Crimes and Other Associated Terms	11
Sex Offenses	12
Domestic Violence	12
Dating Violence	13
Stalking	13
Hate Crimes	14
Reporting Crimes	
What Does a CSA Do?	16
Who is a CSA?	16
Clery Geography	
On-Campus	17
Non-Campus	17
Public Property	17
Crime Chart	
Criminal Offenses	18
Arrests and Student Referrals	19
Violence Against Women Act Offenses	19
Charlestown Navy Yard Campus Boundaries	20
Community Policing Program	20
Security and Maintenance	20
Security Awareness Programs	21
Personal Safety and Security Tips	22

Sensitive Crimes	
What is Sexual Assault?	23
Rape Crisis Centers Information	23
Massachusetts Rape Crisis Programs	24
What is Relationship Violence?	24
What is Dating Violence?	25
What is Stalking?	26
What is Domestic Violence?	28
Domestic Violence Support Services Provided by MGH	
Police, Security and Outside Services	28
Title IX	28
DRUG-FREE CAMPUS AND WORKPLACE PROGRAM	
Background – Drug and Alcohol Use and Addiction	29
Health Risks	29
Local, State, and Federal Sanctions	29
Substance Abuse Policy	30
EMERGENCY RESPONSE and EVACUATION PROCEDURES	
EMERGENCY PREPAREDNESS	32
Types of Emergencies	32
TIMELY NOTIFICATIONS	33
EMERGENCY NOTIFICATION SYSTEM	33
EMERGENCY PREPAREDNESS TEAM	33
RESOURCES	
Employees	34
Sex Offender Registry Board (SORB) Contact Information	34
Students	34
Ongoing educational requirements	34
Clery Geographic Area Map of the Institute	35

Copies of the report may also be obtained from the following places: Human Resources, Office of Enrollment Services, Office of Campus Services, Security desks at Bldgs 36 and 2CW, Provost Office, and **the President's Office**. To request a copy please contact Campus Services Manager at ihpoperations@mghihp.edu

CAMPUS SAFETY

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime **Statistics Act (the "Clery Act")** mandates that colleges and universities:

- Publish an annual security and fire safety report by October 1st that includes the past three years of campus crime and fire safety statistics, campus security policies and procedures, and information regarding programs available to educate the Institute community on safety and crime prevention.
- Report statistics for crimes that occur on campus, in non-campus buildings or property, and on public property that is within the campus or immediately adjacent to and accessible from the campus.
- Report fire statistics for each on-campus student housing facility, if applicable.
- Provide timely warning notices of Clery crimes that are considered to represent a threat to students and employees.
- Establish and implement emergency notification procedures in the event of emergencies occurring on campus that pose an immediate threat to the health or safety of students or employees.
- Maintain a public, written crime log that records crimes reported to campus police (MGH Police & Security) that occur on campus, in non-campus buildings or property, or on public property that is within the campus or immediately adjacent to and accessible from the campus.
- Maintain a public fire log that records any fire that occurred in an on-campus student housing facility, if applicable.
- Establish policies and procedures relating to campus security.

What is the Clery Act?

In 1990, congress enacted the Crime Awareness and Campus Security Act (Title II of Public Law 101-542) which amended the Higher Education Act of 1965 (HEA). This act required all **postsecondary institutions participating in HEA's Title IV student financial assistance programs** to disclose crime statistics and security information. Amendments to the act were made in 1992, 1998, and 2000. The 1998 amendment renamed the law Jeanne Clery Disclosure of Campus Security Policy and Campus Crimes Statistics Act in memory of a student slain in her dorm room in 1986 and is referred to as the Jeanne Clery Act. <http://clerycenter.org/summary-jeanne-clery-act>

What is the Annual Security Report?

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act require postsecondary institutions to provide timely warnings of crimes that represent a threat to the safety of students or employees and to make public their campus security policies. It also requires that crime data be collected, reported, and disseminated to the campus community and to the Department annually. The Clery Act is intended to provide students and their families with accurate, complete, and timely information about safety on campuses so that they can make informed decisions. Such disclosures are permitted under the Family Educational Rights and Privacy Act (*FERPA*).

The most notable recent changes required by higher education institutions include tracking and reporting instances of domestic violence, dating violence, and stalking. You will see definitions of these crimes, programming and education based around these crimes, and reported instances of these crimes reflected in the annual report.

Violence Against Women Reauthorization Act & Campus SaVE Act

On March 7, 2013, President Obama signed into law the Violence Against Women Reauthorization Act (VAWA) which imposed new requirements on colleges and universities under its Campus Sexual Violence Elimination Act (SaVE). The requirements act to add to, refine, clarify and amend the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act and act to reinforce Title IX. The Campus SaVE Act adds offenses involving domestic violence, dating violence and stalking to the crimes that institutions must report in the Annual Safety & Security Report. The Campus SaVE Act also expands the categories of **reportable "hate crimes" to include those based on bias** against gender identity or national origin consistent with Federal statutes.

The Campus SaVE Act amended the definition of sexual offenses and the category of reportable **"sex offenses" to include: rape, sodomy, sexual assault** with an object, fondling, incest and statutory rape consistent with the uniform crime reporting system of the Federal Bureau of Investigation. The Annual Safety & Security Report must also include detailed descriptions of **the institution's internal procedures** to resolve issues of domestic violence, dating violence, or stalking, resources on-and-off campus, as well as descriptions of its educational and preventative programs.

<https://www.mghihp.edu/campus-and-community-life/title-ix-compliance-overview>

Sexual Harassment Policy

<http://www.smartcatalogiq.com/Catalogs/MGH-Institute-of-Health-Professions/2021-2022/Student-Handbook/Section-II-Institute-Policies/Title-IX-Sexual-Harassment-Assault-and-Non-Discrimination-Policies>

MISSION STATEMENT

The mission of the Massachusetts General Hospital Police and Security Department is to proactively and competently provide protective and supportive services to the MGH Community facilitating a welcoming, accessible, and safe environment.

PHILOSOPHY

It is the philosophy of the Police and Security department to provide services to everyone in the MGH Community in a fair, equitable, consistent and professional manner. We will render our services in a diplomatic, unbiased and compassionate manner. Our objective is to provide public service to all while simultaneously protecting the people and assets of MGH community.

WHO WE ARE

MGH Police Officers are trained at state recognized law enforcement training academies and through ongoing in-service and specialized training programs. Many members of the police department have degrees in criminal justice and related fields. MGH Police and Security personnel are carefully selected, well trained, and committed to working with you to provide for the safety and security of our community. The MGH is committed to assuring the basic rights of all victims.

Integral to meeting our mission is maintaining proactive and efficient processes and programs. Our 24/7 communications centers utilize a computer aided dispatch system, which allows for efficient monitoring, deployment of personnel, and documentation of calls received. The computer aided dispatch is integrated with our incident reporting system, enabling appropriate documentation of incidents that are reported to us. In addition, the department has created a robust risk assessment program. A risk assessment is the process of evaluating threats to our assets; determining vulnerabilities that these threats can exploit; and making recommendations to mitigate the likelihood of these threats occurring, being successful, or having a large impact. Our department utilizes the information from the computer aided dispatch, the incident reporting system and risk assessments to interpret and understand the possible causes and impacts of trends, patterns, and changes in data, which impacts MGH.

MGH Police

The MGH Police and Security Department receives its authority from the Commonwealth of Massachusetts. All MGH Police officers are considered special state police officers under provisions of Massachusetts General Law Chapter 22C, Section 63. Generally, MGH Police officers are authorized to make arrests for criminal offenses in or upon lands or structures owned, used, or occupied by the hospital, or in places where related business is conducted. This authority extends beyond the confines of the various campuses as determined by special state police status or by previous court decisions. The hospital police enjoy strong professional relationships with state and local law enforcement agencies. Cooperative programs and information exchanges are ongoing priorities. Through this reporting relationship, the MGH Police relay information to the MGH community on crimes that may pose a threat on any of the campuses. Operational and technical support is mutually provided when necessary.

Photo Identification Policy

All employees and students must wear an identification badge whenever performing Institute duties or engaged in other Institute business in Institute or MGH buildings. The badge will ensure students, patients, visitors, and employees are able to identify who is or who is not a member of the MGH community.

Access to MGH IHP Facilities

The Institute is a private facility. Only those persons with legitimate business at any of its locations are considered authorized to have access to its facilities. This being said, the public does have the opportunity to gain access to various areas by the very nature of the MGH and MGH IHP community. This presents unique challenges in maintaining safety and security at all locations. There are a few general rules in place meant to prevent unauthorized access to specified areas within MGH IHP buildings and properties.

Many locations at the MGH IHP are secured via security card reader. The timeframes **established for these areas to be secured are determined by managerial request and the area's** sensitivity. Only persons with access programmed into their respective MGH photo identification cards are allowed access to these areas. All others are considered intruders, and students and employees are urged to report their presence to the MGH Police immediately.

Duplicating keys and photo identification cards and propping secured doors open are violations of Institute and hospital policy, and violators may be disciplined.

DEVELOPING INFORMATION FOR THIS REPORT

Crime Statistics

The MGH Police and Security Department reaches out to departments within the MGH community as well as local law enforcement agencies to collect crime statistics. Please note, the crime statistics in this report are for the IHP geographical location only in accordance with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act regulations. The MGH Police and Security Department when appropriate will coordinate their investigations with local police agencies.

It is important to note that some victims prefer not to report incidents of crime to the police, but to confide in various confidential sources. Victims and witnesses may report crimes on a voluntary, confidential basis. Reasonable attempts have been made to identify all reported crimes and to present the statistics in this report as well as offenses known by or reported to the MGH Police and Security Department.

If a member of the MGH or IHP community is alleged to have been involved in criminal conduct, administrators and Human Resources will be notified when deemed necessary and where the law permits.

Daily Crime Log

In keeping with the Jeanne Clery Disclosure of Campus Security Police and Campus Crime Statistics Act of 1998, MGH Police and Security maintains a daily crime log that records criminal incidents by the date reported. The log includes nature of the crime, date and time the crime occurred, general location of the crime and the disposition of the complaint, if known. The log can be viewed at the following locations during normal business hours of 9:00 a.m. – 5:00 p.m.:

Massachusetts General Hospital
MGH Police, Security and Outside Services

Charlestown Navy Yard
Building 149 13th Street
Boston, MA

WAC 2 – Room 232
55 Fruit Street
Boston, MA

MGH Institute of Health Professions
Charlestown Navy Yard
36 1st Avenue
Boston, MA 02129

Preparation of Disclosure of Crime Statistics

The MGH Institute of Health Professions *in partnership* with MGH Police, Security and Outside Services prepares this report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act. The full text of this report will be located on our web site <http://www.mghihp.edu/about-us/offices-and-services/facilities/campus-safety-and-security/default.aspx>.

Each year by October 1st an e-mail notification is made to all enrolled students and employees announcing the availability of the Annual Security Report (ASR) and the location to access this report. Copies of the report may also be obtained from the following places: Human Resources, Office of Student and Alumni Services, Office of Campus Services, Security desks at Bldgs 36 and 2CW, **Provost Office, and the President's Office.**

Prospective students and employees are made aware of this report. Students can find the report on- **line "Preparing For Your Arrival To The Institute."** Prospective employees receive a letter from President Milone-Nuzzo in the new hire packet. This letter contains the URL to the ASR.

The Institute is a "commuter campus" and a "non-residential institution" as such, features no institute-sponsored housing. Additionally, there are no off-campus student organizations, including student organizations with off-campus housing facilities that are recognized by the institution.

MGH Institute of Health Professions is not required to provide policy statements regarding missing persons and fire evacuation plans because it is a non-residential institution.

Definitions of Reportable Crimes and Other Associated Terms
(Definitions provided by the Federal Bureau of Investigation (FBI) Uniform Crime Reporting (UCR) Program)

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

Negligent Manslaughter: The killing of another person through gross negligence.

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, violence and/or causing the victim fear.

Motor Vehicle Theft: The theft or attempted theft of a motor vehicle. (Classify as motor vehicle theft all cases where automobiles are taken by persons not having lawful access even though the vehicles are later abandoned, including joy riding.)

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, etc.

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

Drug Abuse Violations: Violations of state and local laws relating to the unlawful possession, sale, use, growing, manufacturing and making of narcotic drugs. The relevant substances include: opium or cocaine and their derivatives (morphine, heroin, codeine), marijuana,

synthetic narcotics (Demerol, methadone) and dangerous non-narcotic drugs (barbiturates, Benzedrine).

Illegal Weapons Law Possession: The violation of laws or ordinances dealing with weapon offenses, regulatory in nature, such as: manufacture, sale, or possession of deadly weapons; carrying deadly weapons to minors; aliens possessing deadly weapons; all attempts to commit any of the aforementioned. Clerly reportable offense crime definitions are taken from the FBI Uniform Crime Reporting Handbook.

Liquor Law Violations: The violation of laws or ordinances prohibiting: the manufacture, sale, transporting, furnishing, possessing of intoxicating liquor; maintaining unlawful drinking places; bootlegging; operating a still; furnishing liquor to a minor or intemperate person; using a vehicle for illegal transportation of liquor; drinking on a train or public conveyance; all attempts to commit any of the aforementioned. (Drunkenness and driving under the influence are not included in this definition.)

Sex Offenses

Sexual Assault: Any nonconsensual sexual act proscribed by Federal, including when the victim lacks capacity to consent. An offense that meets the definition of rape, fondling, incest, or statutory rape as used in the **FBI's UCR program. (42 U.S. Code Section 13925 (a)(29))**

- **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/her age or because of his/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.

Domestic Violence:

1. A felony or misdemeanor crime of violence committed by a current or former spouse or intimate partner of the victim; by a person with whom the victim shares a child in common; by a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner; by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; by any **other person against an adult or youth victim who is protected from that person's acts** under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred (42 U.S. Code Section 13925 (a)(8)); or

2. Physical abuse, harassment, intimidation of a dependent, interference with personal liberty or willful deprivation of a family or household member, which includes spouses, former spouses, parents, children, stepchildren and other persons related by blood or by present or prior marriage, persons who share or formerly shared a common dwelling, persons who have or allegedly have a child in common, and persons who share or allegedly share a blood relationship through a child. (725 ILCS 5/112A-3; 750 ILCS 60/103).

Dating Violence:

1. Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. For the purposes of this definition, dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. Dating violence does not include acts covered under the definition of domestic violence. Any incident meeting this definition is considered a crime for the purposes of Clery Act reporting (42 U.S. Code Section 13925 (a)(9) and (10)); or
2. Threatening to use physical, mental, or emotional abuse to control another person who is in a dating relationship with the person (See 105 ILCS 110/3.10).
3. The existence of a dating relationship in 1 or 2 above shall be determined based on the **reporting party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.**

Stalking:

1. Engaging in a course of conduct directed at a specific person that would cause a reasonable **person to (A) fear for the person's safety or the safety of others; or (B) suffer substantial** emotional distress. For the purposes of this definition: (i) 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; (ii) Reasonable person means a reasonable person under similar circumstances and with similar identities to the victim; (iii) Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling; (iv) Any incident meeting this definition is considered a crime for the purposes of Clery Act reporting (42 U.S. Code Section 13925 (a)(30)) or
2. (A) Knowingly and without lawful justification, on at least 2 separate occasions, following another person or placing the person under surveillance or any combination thereof and (i) at any time transmitting a threat of immediate or future bodily harm, sexual assault, confinement or restraint and the threat is directed towards that person or a family member of that person, or (ii) places that person in reasonable apprehension of immediate or future bodily harm, sexual assault, confinement or restraint to or of that person or a family member of that person; or (B) when, having been previously convicted of stalking another person, knowingly and without lawful justification on one occasion, (i) follows that same person or places that same person under surveillance; and (ii) transmits a threat of immediate or future bodily harm, sexual assault, confinement or restraint to that person or a family member of that person. (720 ILCS 5/12-7.3).

3. Stalking may be accomplished by physical act or electronic means, such as computer or cell phone.

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

Hate Crimes: Hate Crime is a criminal offense that manifests evidence that the victim was **intentionally selected because of the perpetrator's bias against the victim.**

Although there are many possible categories of bias, under the Clery Act, only the following eight categories are reported:

- Race: A preformed negative attitude toward a group of persons who possess common physical characteristics, e.g., color of skin, eyes, and/or hair; facial features, etc., genetically transmitted by descent and heredity which distinguish them as a distinct division of humankind, e.g., Asians, blacks or African Americans, whites.
- Religion: A preformed negative opinion or attitude toward a group of persons who share the same religious beliefs regarding the origin and purpose of the universe and the existence or nonexistence of a supreme being, e.g., Catholics, Jews, Protestants, atheists.
- Sexual Orientation: A preformed negative opinion or attitude toward a group of persons based on their actual or perceived sexual orientation. Sexual Orientation is the **term for a person's physical, romantic, and/or emotional attraction to members of the same and/or opposite sex, including lesbian, gay, bisexual, and heterosexual (straight) individuals.**
- Gender: A preformed negative opinion or attitude toward a person or group of persons based on their actual or perceived gender, e.g., male or female.
- Gender Identity: A preformed negative opinion or attitude toward a person or group of persons based on their actual or perceived gender identity, e.g., bias against transgender or gender non-conforming individuals. Gender non-conforming describes a person who does not conform to the gender-based expectations of society, e.g., a woman dressed in traditionally male clothing or a man wearing makeup. A gender non-conforming person may or may not be a lesbian, gay, bisexual, or transgender person but may be perceived as such.
- Ethnicity: A preformed negative opinion or attitude toward a group of people whose members identify with each other, through a common heritage, often consisting of a common language, common culture (often including a shared religion) and/or ideology that stresses common ancestry. The concept of ethnicity differs from the closely related **term "race" in that "race" refers to a grouping based mostly upon biological criteria, while "ethnicity" also encompasses additional cultural factors.**

- National Origin: A preformed negative opinion or attitude toward a group of people based on their actual or perceived country of birth. This bias may be against people that have a name or accent associated with a national origin group, participate in certain customs associated with a national origin group, or because they are married to or associate with people of a certain national origin.
- Disability: A preformed negative opinion or attitude toward a group of persons based on their physical or mental impairments, whether such disability is temporary or permanent, congenital or acquired by heredity, accident, injury, advanced age or illness.

For *Clery Act* purposes, Hate Crimes include any of the following offenses that are motivated by bias.

- | | |
|---|--|
| • Murder and Non-negligent Manslaughter | • Arson |
| • Sexual Assault | • Larceny-Theft |
| • Robbery | • Simple Assault |
| • Aggravated Assault | • Intimidation |
| • Burglary | • Destruction/Damage/Vandalism of Property |
| • Motor Vehicle Theft | |

Awareness programs: Community-wide or audience specific programming, initiatives, and strategies that increase audience knowledge and share information and resources to prevent violence, promote safety, and reduce perpetration.

Bystander intervention: Safe and positive options that may be carried out by an individual or individuals to prevent harm or intervene when there is a risk of dating violence, domestic violence, sexual assault, or stalking Bystander intervention includes:

- Recognizing situations of potential harm
- Understanding institutional structures and cultural conditions that facilitate violence, overcoming barriers to intervening, identifying safe and effective intervention options, and taking actions to intervene

Ongoing prevention and awareness campaigns: Programming, initiatives, and strategies that are sustained over time and focus on increasing understanding of topics relevant to and skills for addressing dating violence, domestic violence, sexual assault, and stalking, using a range of strategies with audiences throughout the institution.

REPORTING CRIMES

The job of safety on campus does not rest solely in the hands of public safety or campus police. It is a collaborative effort across offices on campus. This effort is known as Campus Security Authority (CSA).

What does a CSA do?

The Campus Security Authority's primary responsibility is to report allegations *made in good faith* to the reporting structure established by the Institution.

Who is a campus security authority?

- Campus police/security department
- Individuals responsible for security
- Individual or offices designated to receive crime reports
- Officials with significant responsibility for student and campus activities
- Administrator of students
- Faculty advisor to a student organization
- Title IX coordinator

In addition to the Campus Security Authorities members of the MGH IHP community are encouraged to report all crimes to the MGH Police and Security Department. Members of the community may report crimes by visiting one of the various police locations: Charlestown Navy Yard in Building 149 13th Street and on the Main Campus (55 Fruit Street, Clinics 044) and or by calling one of the listed phone numbers. These numbers can also be used if police or emergency medical services are needed in one of these locations. Telephones are available throughout all campuses. Charlestown Navy Yard (617) 726-5400, Building 36 (617) 726-0528, and 2CW (617) 643-9970 and the MGH Main Campus (617) 726-2121.

Reporting crime is important because it allows us to reassess security controls and patrol strategy and develop better methods of crime prevention. MGH Police officers investigate complaints filed by community members and pursue investigations to their most reasonable conclusion. Investigators may conduct follow-up investigations with support.

The interests of the victim are always our primary concern. The MGH Police and Security recognize the importance of confidentiality and of protecting the identity of a victim in the course of a successful investigation. **In criminal matters, the victim's preferences greatly influence the way in which a case is processed.**

The Institute has a number of alternatives at its disposal to adjudicate inappropriate behavior, whether or not it is of a criminal nature. In addition to pursuing cases through the courts, the Institute uses an internal corrective action structure to decide on specific issues unique to academic life.

MGH Charlestown Navy Yard Police Dispatch: (617) 726-5400 MGH Main Campus Police Dispatch: (617) 726-2121
--

CLERY GEOGRAPHY

On-Campus – means all property, including 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.

Crime Chart
The MGH Institute of Health Professions Campus

Criminal Offenses

Type of Offense	Year	On Campus	Non-Campus	Public Property	Total
Murder and non-negligent manslaughter					
	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Negligent manslaughter					
	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Sex offenses: forcible					
	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Sex offenses: non-forcible					
	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Robbery					
	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Aggravated assault					
	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Burglary					
	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Motor vehicle theft					
	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Arson					
	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Hate crimes					
	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0

Hate crime statistics include prejudice (race, gender, religion, sexual orientation, ethnicity, or disability.)

Arrests and Student Conduct Referrals

Type of Offense	Year	On Campus	Non-Campus	Public Property	Total
ARRESTS					
Liquor law violations					
	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Drug law violations					
	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Weapons law violations					
	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
JUDICIAL REFERRALS					
Liquor violations					
	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Drug violations					
	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Weapons violations					
	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0

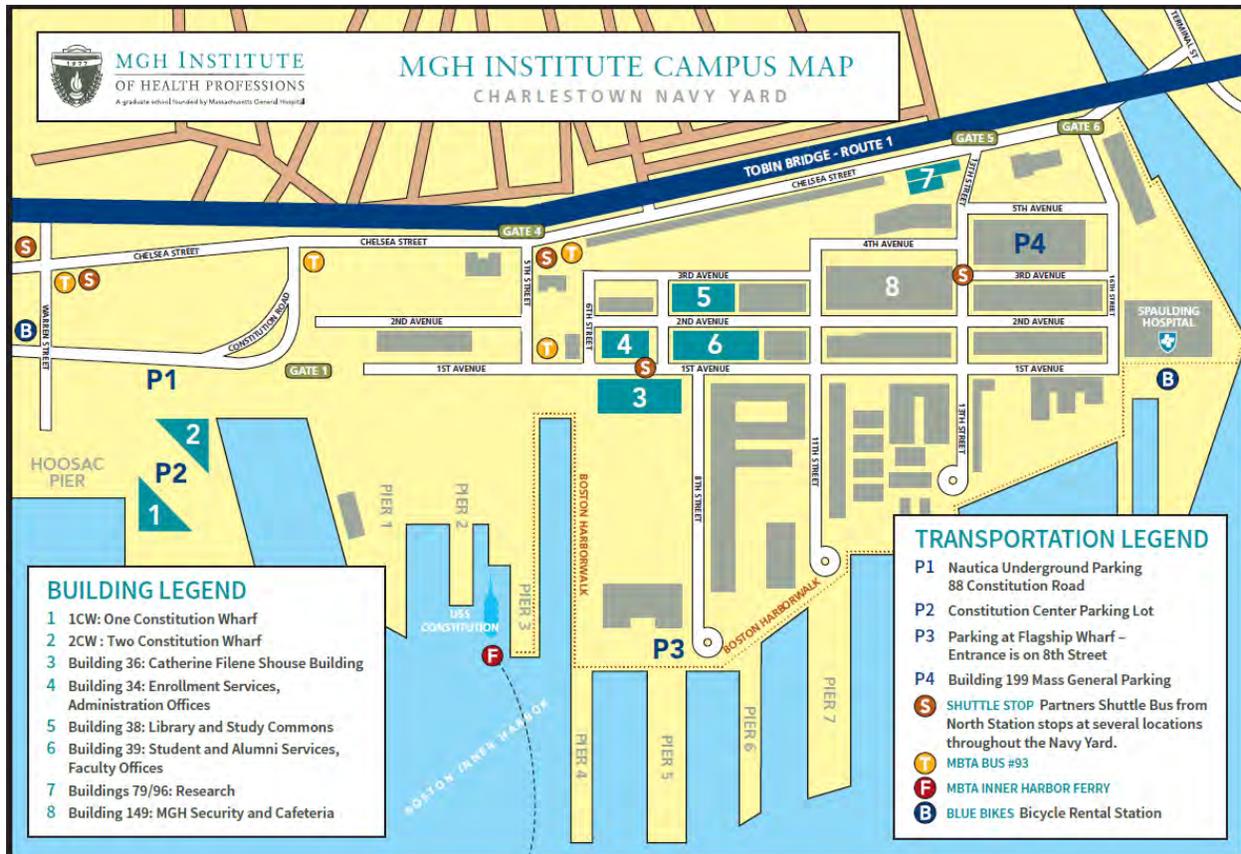
Violence Against Women Act Offenses (for crimes reported in 2017 forward)

Type of Offense	Year	On Campus	Non-Campus	Public Property	Total
Stalking (includes cyber stalking)					
	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Domestic Violence					
	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0
Dating Violence					
	2018	0	0	0	0
	2019	0	0	0	0
	2020	0	0	0	0

Statement: The MGH Institute of Health Professions has no residential facilities.

Charlestown Navy Yard Campus Boundaries

The general geographical boundaries of the Charlestown Navy Yard Campus are: Chelsea Street, Sixteenth Street, First Avenue, Constitution Wharf, 2nd, 3rd, 5th, 6th, 8th and 9th Streets, Terry Ring Way and Ship Yard Park. See Clery Geographical Map at end of the ASR.



Community Policing Program

The goal of the MGH Police and Security Department is to work consistently toward providing an environment that is as safe and secure as can reasonably be expected. Community policing is a philosophy that meets this goal by bringing together the MGH community and the MGH Police and Security in a partnership designed to address security issues on campus. This cooperative effort and the purpose of the program is to increase training, communication, safety, and security awareness, **and to develop “consulting” relationships specific to individual locations.** Also, it should increase our effectiveness in difficult and emergency situations by enhancing the ability to work as a team. Ultimately, the quality of life on campus **is enhanced.**

Security and Maintenance

The MGH Police and Security, in cooperation with Institute Office of Campus Services conduct frequent security surveys, lighting surveys, and inspections of electronic security systems in an ongoing effort to examine the need for modification and to elevate the level of campus protection.

Channels of internal communications exist to facilitate the repair or improvement of security systems on campus. The Office of Campus Services recognizes the importance of responding promptly to requests that involve security issues.

Security Awareness Programs

During employee and student orientation participants are informed of services and presentations offered by the MGH Police and Security in cooperation with the Institute:

- crime prevention awareness programs on sexual assault
- alcohol and drug abuse
- theft and vandalism
- educational sessions on personal safety and work safety
- other topics of prevention and education programs offered include prevention of dating violence, sexual assault, stalking, workplace violence, identity theft, and Internet safety

A common theme of all awareness and crime prevention programs is to encourage participants to be aware of their responsibility for their own security and the security of others. In addition to seminars, information is disseminated to the MGH IHP community through safety alert posters, displays, videos, and articles and advertisements. When time is of the essence, information is released to the Institute community through safety alerts posted prominently **throughout campus, through computer memos sent over the Institute's electronic mail system** and a voice-mail broadcasting system.

Here are some of the services provided by MGH Police and Security & Outside Services:

- Emergency Services and Response
 - Response to Suspicious Individuals or Activities
 - Response to Suspicious Packages or Substances
- Proactive Security Services
 - Safety and Security Presentations
 - All Points Bulletin (APB)
 - Outreach Training and Education
 - Community Policing
 - A.L.E.R.T. Program
 - Security Escorts
 - Security Standbys
- Domestic Violence Assistance
- Workplace Violence Program
- Active Shooter

For a full listing of safety and security awareness programs click on the following link:

<http://www.massgeneral.org/police/services/>

Responsibilities of Institute Community for Personal Safety and Security of Their Personal Property.

The following precautions provide guidance:

- Report all suspicious activity to MGH Police and Security immediately
- Never take personal safety for granted
- Try to avoid walking alone at night
- Use the MGH Police and Security Escort Service from IHP buildings to your vehicle within the Navy Yard.
- Limit your alcohol consumption, and leave social functions that get too loud, too crowded, or that have too many people drinking excessively
- If you do choose to consume alcohol, do not leave your beverage unattended or trust anyone to watch over your beverage
- Carry only small amounts of cash
- Never leave valuables (wallets, purses, books, phones, etc.) unattended
- Carry your keys at all times and do not lend them to anyone
- Do not lend your IHP ID to anyone
- Lock up bicycles and motorcycles
- Lock car doors and close windows when leaving your car
- Do not leave valuables in your car, especially if they can be easily noticed

SENSITIVE CRIMES

Sexual Assault

What is Sexual Assault?

Sexual assault is any unwanted, coerced, or forced sexual contact or intercourse OR sexual contact or intercourse with someone who is not able to give consent (e.g. under the influence of alcohol or drugs or asleep). Sexual assault can involve the sexual penetration of a body orifice, but also includes other unwanted sexual contact. Victims can be either women or men. Most victims/**survivors know the perpetrators who may be the victim's/survivor's best friend,** lover, partner, date, family member, neighbor, teacher, employer, doctor, or classmate. The perpetrator can be a boyfriend or girlfriend. Sexual assault can occur between members of the opposite sex or same sex. Alcohol, rape drugs, or other substances may be involved.

Policy:

<http://www.smartcatalogiq.com/Catalogs/MGH-Institute-of-Health-Professions/2021-2022/Student-Handbook/Section-II-Institute-Policies/Title-IX-Sexual-Harassment-Assault-and-Non-Discrimination-Policies>

What if this happens to me?

If you are sexually assaulted, you may want to consider:

- Finding a safe place
- Calling a friend
- Calling for assistance
- Contacting hospital or community police
- Seeking medical treatment
- Preserving evidence

Preserving Evidence: Things you need to know to make decisions

It is very difficult to know in the immediate aftermath of sexual assault whether or not you might eventually want to pursue legal charges. Having evidence collected does not commit you to reporting the assault; the evidence can be sent to the crime lab anonymously and held for six months. Evidence can usually be collected up to five days after the assault, though the likelihood of capturing evidence decreases with time. Showering, urinating, and brushing your teeth may destroy evidence. Your clothing or bedding may contain evidence; take these with you to the Emergency Department in a PAPER BAG (not plastic). You may stop the exam at any time, and you may have someone with you during the exam.

The drugs used in drug-facilitated sexual assault leave the body very quickly. If you suspect that you may have been drugged and need to urinate before arriving at the Emergency Department, try to collect the urine in a clean container and take it with you.

Rape Crisis Centers

<http://www.mass.gov/eohhs/consumer/physical-health-treatment/health-care-facilities/rape-crisis-centers.html>

Relationship Violence

What is Relationship Violence?

Relationship violence is defined as intentionally violent or controlling behavior by a person who is currently or was previously in a relationship with the victim. Relationship violence includes actual or threatened physical injury, sexual assault, psychological abuse, economic control, and/or progressive social isolation. Relationship violence occurs in heterosexual and same sex relationships.

This information is focused on romantic relationships. The same resources can be used for interpersonal violence between roommates.

How do I know it is Relationship Violence?

Does your partner exhibit a pattern of controlling behavior?

- Acting jealous all the time
- Criticizing your behavior and with whom you spend time
- Using looks, actions, or gestures that make you afraid
- Expecting you to ask permission
- **Threatening to 'out' you**
- Yelling at you, humiliating you or putting you down
- Checking up on you, playing mind games, or making you feel as if you are crazy
- Insisting on making all the decisions

Has your partner ever:

- **Insisted on having sex or pressured you to do something sexual when you didn't want to**
- Pushed, slapped, bit, kicked, or choked you
- Threatened to kill you or anyone dear to you
- Threatened to commit suicide

Do you feel:

- Like you are walking on eggshells
- That you have to call your friends in secret
- That you must dress a certain way to keep your partner from getting upset

Scenarios:

- My partner yelled at me for being late for lunch. It was so humiliating. My partner grabbed my arm and we left the dining hall. I was really upset. Later we made up and my partner was so sorry for embarrassing me. Things are OK now though I wonder when it will happen again.
- My partner hates it when I spend time with my friends. I feel like I have to sneak around. The other day, my partner got angry about seeing me with a good friend and **wouldn't speak to me for several days. When I apologized for seeing my friends** without permission, we made up. We have a really good time together as long as I don't hang out with my friends.

Remember, if you are a victim of relationship violence, it is not your fault:

- Do any of these examples describe your relationship? Or that of a friend?
- Do you feel like your relationship might be unhealthy or unsafe?
Uncertainty about the health of your relationship can be confusing and feel overwhelming. You might want to talk to someone about your concerns.

What can I do?

- Talk to family and friends who can offer support
- Talk to professionals who can help you decide what options will work best for your situation
- Contact Employee Assistance <http://www.eap.partners.org/>, also available to students
- Contact an Institute Campus Security Authority (see page 16)

If you are thinking about leaving your relationship:

- Most people find it increases their safety to talk to someone about their plans for ending a relationship before they actually take steps to end it
- Identify friends or family who live nearby with whom you can stay
- Think about obtaining a restraining order with support from MGH Police and Security

Helping a friend in an unsafe relationship

- Let the person know you support and care about them
- Tell them they do not deserve to be abused
- Share your concern for their safety
- Inform them about available resources
- Encourage them to utilize the resources

Take advantage of these resources yourself to increase your knowledge about ways to be helpful.

Dating Violence

What is Dating Violence?

Dating violence means "violence committed by a person

- Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- Where the existence of such a relationship shall be determined based on a consideration of the following factors:
 - ◆ The length of the relationship,
 - ◆ The type of relationship; and
 - ◆ The frequency of interaction between the persons involved in the **relationship."**

Stalking

What is Stalking?

Stalking is defined as threats, along with repeated harassing behavior, such as:

- Following a person
- **Appearing at a person's** home, class or work
- Making harassing phone calls and e-mails
- Leaving written messages or objects
- **Vandalizing a person's property**

It can include the use of regular mail, email, instant messaging, or faxes.

Policy

<http://www.smartcatalogiq.com/Catalogs/MGH-Institute-of-Health-Professions/2021-2022/Student-Handbook/Section-II-Institute-Policies/Title-IX-Sexual-Harassment-Assault-and-Non-Discrimination-Policies/Stalking>

MGH Policy on Stalking

Stalking and cyber stalking are behaviors prohibited by Institute policy and Massachusetts law. In Massachusetts such conduct are felonies. Stalking includes a willful and malicious knowing pattern of conduct or acts over a period of time directed at a specific person which seriously alarms or annoys the person, and which causes a reasonable person to suffer substantial emotional distress and makes a threat with the intent to place the person in imminent fear of death or bodily injury. Stalking can be accomplished by mail, telephone, electronic mail, internet communications, and facsimile. Conduct which does not include a threat of death or bodily injury is also illegal and considered harassment by hospital policy and Massachusetts law.

Who are victims of Stalking?

Anyone can be stalked, including the hospital community from any economic, ethnic, or religious group. A few victims are picked at random by their stalker, but most stalking victims know their stalker, usually having had some type of present or past relationship.

The perpetrator can be an intimate partner or former partner, classmate, roommate, or other **acquaintance. A victim can be stalked for several days or for many years. The stalker's actions** can also affect family, friends, and coworkers. Stalking and criminal harassment can be difficult to distinguish. Talk to one of the resources listed in this pamphlet for help.

How do I know it is Stalking?

Scenarios:

- **I dated this woman a couple of times but then wasn't interested in seeing her again.** She said someone **would get hurt if I broke up with her. "If I can't have you, no one else can,"** she told me. We weren't in contact for a while, but now she keeps sending me e-mails. **Sometimes I don't answer her. I changed my** address, but she found out what the new one was. I wish she would stop.
- Two weeks ago, **someone left me an anonymous "secret admirer" note in the library in** one of my books while I was studying. Last week I was studying in the campus center and got up to stretch. When I came back, I found a cup of coffee **with a note, "I am**

always watching you.” This morning there were flowers outside my room. My friends don’t know who is doing this and it feels creepy!

The absence of a threat means that this last example does not meet the legal definition of stalking. However, it might have the same impact. If you or someone you know is experiencing a similar situation, please get help by contacting any of the resources listed in this brochure for **more information. If you feel frightened or uncomfortable about someone’s** specific behavior, pay attention to your instincts! Seek help.

What can a Stalking victim do?

- Talk to one of the resources listed in this brochure for help
- Report the stalking to the MGH Police and Security, or the police in your area, and follow their advice
- Inform others close to you (family, friends, residential life staff, coworkers) about the stalking
- Do your best to safely avoid all contact with the stalker
- Keep a journal or log of all incidents connected to the stalking
- Keep any letters, packages, taped telephone messages, or e-mails received from the stalker
- Provide police with photographs of the suspect, a description, and other information

Follow basic safety tips:

- > Try not to walk alone
- > Know your surroundings: where emergency phones and panic buttons are located
- > Lock your car and house doors when alone
- > Use different routes to drive or walk to campus or other routine places
- > Park your vehicle in well-lit areas
- > Check your vehicle including front and rear passenger seat areas before getting in
- > Change locks to your home and car
- > Use the Safety Escort program by calling the MGH Police and Security

Restraining Orders

There are several types of restraining orders that can be obtained through the police.

- A restraining order (209A) is a court order issued by a judge that requires your past or present boyfriend, girlfriend, roommate, or blood relative to stop abusing you or face criminal penalties. There are a number of requirements that need to be met in order for a victim to apply for a criminal restraining order.
- A civil stay away order is a type of restraining order, available to someone who is being abused or stalked by a non-partner/roommate/relative.
- A Harassment Prevention Order- 258E is a court order issued by a judge that requires the defendant to stop abusing or harassing you or face criminal penalties. No domestic relationship is necessary to obtain a 258E. There are a number of requirements that need to be met in order for a victim to apply for a 258E.

Please call the MGH Police and Security Department for more information about either order.

[Statewide Domestic Violence Hotline \(includes stalking\): Safe Link 1-877-785-2020](#)

Domestic Violence

Domestic Violence means a “felony or misdemeanor crime of violence committed by –

- a current or former spouse or intimate partner of the victim,
- a person with whom the victim shares a child in common,
- a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner,
- a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies (under VAWA), or
- **any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction.”**

Policy

<http://www.smartcatalogiq.com/Catalogs/MGH-Institute-of-Health-Professions/2021-2022/Student-Handbook/Section-II-Institute-Policies/Title-IX-Sexual-Harassment-Assault-and-Non-Discrimination-Policies/Domestic-Violence>

Domestic Violence Support Services Provided by MGH Police, Security and Outside Services

Special Investigations Unit provides the following victims assistance services:

- Investigators will provide consultation and guidance with the Abuse Prevention Order (209A) process and the filing of criminal charges. This may include assisting an individual with filing for a 209A order and filing criminal charges with the individuals local police department as appropriate.
- Investigators as appropriate will maintain a case file to assist with court proceedings.
- If a violation of the 209A occurs, investigators will provide assistance in how to file the appropriate criminal charges.
- Threat assessments are performed and based upon the results; a personalized security plan is developed.
- Security surveys are performed to enhance security in the workplace or at home.

Title IX of the Education Amendments of 1972

Title IX is an all-encompassing federal law that prohibits discrimination on the basis of the sex of students and employees at educational institutions which receive federal financial assistance. Please follow the link below:

<http://www.smartcatalogiq.com/Catalogs/MGH-Institute-of-Health-Professions/2021-2022/Student-Handbook/Section-II-Institute-Policies/Title-IX-Sexual-Harassment-Assault-and-Non-Discrimination-Policies>

The United States Department of Education's Office of Civil Rights (OCR) is in charge of enforcing Title IX. It states:

No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance. 20 U.S.C. § 1681

Title IX education for employees and students is a requirement. Education videos are provided by the Institute.

BACKGROUND—DRUG AND ALCOHOL USE AND ADDICTION

The illicit use of drugs and alcohol can have a substantial impact on the health, safety, and overall success of members of the Institute and MGH community and their families. The Institute is committed to reducing the harm related to the misuse and abuse of drugs and alcohol within the Institute Community. Along with substantial health and safety risks are potentially significant legal consequences. Therefore, all students and staff of the MGH Institute are urged to read the information enclosed.

HEALTH RISKS

Although drinking in moderation has been shown to have some positive impact on health, misuse and abuse of alcohol can have negative—and often dangerous—effects. These include:

- > Impairing the judgment and coordination of a driver, increasing the likelihood of an accident;
- > Reducing inhibitions, leading to aggression, violence, and/or sexual assault;
- > Effecting physical health—mental functioning, respiratory depression, liver disease, etc.; and,
- > Leading to fetal alcohol syndrome for women who drink while pregnant.

LOCAL, STATE, AND FEDERAL SANCTIONS CONCERNING ALCOHOL AND DRUGS

Local, state, and federal laws make the illegal use of drugs and alcohol a criminal offense. Conviction can lead to imprisonment, fines, and other penalties. Courts do not alter sentences so that convicted persons may attend college or continue their jobs. A felony conviction may prevent one from continuing or entering certain professions.

Cities and towns in Massachusetts prohibit public consumption of alcohol and impose fines for violation. The Department of Recreation and Conservation also prohibits public consumption of alcohol in its parks and public recreational areas. Boston and other cities and towns surrounding the MGH campuses have ordinances forbidding the possession of an open container of alcohol on any public street by a person of any age. Anyone choosing to violate such ordinances can be subject to arrest.

Massachusetts law prohibits the sale or delivery of alcoholic beverages to persons under age 21. The penalty for violating this law may be a fine of up to \$2,000 or one year imprisonment, or **both**. **Misrepresenting one's age or falsifying an identification to obtain alcohol is punishable by fine.** Massachusetts law also prohibits the possession of an open container of alcohol in the passenger area of any motor vehicle.

Among the penalties under Massachusetts law for the first conviction of driving under the influence of alcohol are a \$5,000 fine, a one **year revocation of driver's license, up to two and a half years in prison, and a mandatory alcohol education program.** For drivers between 16 and 21, any alcohol level greater than .02 (about one drink or one beer) will result in immediate revocation of the **driver's license. For those over 21, the maximum blood level is .08.**

Massachusetts imposes criminal penalties for the possession and/or distribution of controlled substances or drugs without valid authorization, with penalties varying as to the type of drug. Sale and possession of drug paraphernalia is illegal in Massachusetts. Under both Massachusetts and federal law, penalties for possession, manufacture, and distribution are greater for subsequent conviction, and include mandatory prison terms, with the full minimum term being served. Massachusetts makes it illegal to be in a place where heroin is kept and to be in the company of a person known to possess heroin.

Persons convicted of drug possession under state or federal laws are ineligible for federal student grants and loans for up to one year after the first conviction and up to five years after the second. The penalty for unlawful distribution of drugs is loss of benefits for five years after the first conviction and for a longer period after the second.

Under federal law, penalties may be doubled when a person at least 18 years old distributes drugs to persons under age 21 within 1,000 feet of a public or private elementary or secondary school or a public or private college. These penalties include a mandatory one-year prison term.

Drug trafficking involves the illegal manufacturing, supplying, transporting, storing and/or distribution of drugs; drug possession involves having drugs for personal consumption while possession of large quantities may be deemed an intent to distribute which is subject to larger penalties.

SUBSTANCE ABUSE POLICY

Overview

Employees and students are the Institute's most valuable resource, and, for that reason, their health and safety are of paramount concern. The Institute is committed to maintaining a safe, healthy and efficient environment that enhances the welfare of its employees and students and visitors. It is the policy of the Institute to maintain an environment that is free from impairment related to substance abuse by any of its employees.

Employees

The Institute expects employees to arrive for work in a condition free from the influence of alcohol and drugs, and to remain so while they are on the job and to refrain from their use, possession, sale or unlawful distribution on hospital property. All new employees must sign the MGH Drug-free Workplace Statement upon hire.

Students

The Institute expects students to be in a condition free of the influence of alcohol and drugs, and to remain so while they are at the Institute and carrying out educational responsibilities. Employees and students shall refrain from drug and alcohol use as well as possession, sale, or unlawful distribution on Institute or MGH property. Violation of this policy may result in corrective action up to and including dismissal or discharge.

Excerpt from Student Catalog, Substance Abuse Policy:

<http://www.smartcatalogiq.com/Catalogs/MGH-Institute-of-Health-Professions/2021-2022/Student-Handbook/Section-II-Institute-Policies/Substance-Abuse-Policy>

Unfit for Duty

Unfit for Duty means, for the purposes of this policy, that the employee is affected by a drug or alcohol, or the combination of a drug and alcohol, in any detectable manner wherein such use or influence may affect the safety of the employee, co-workers, students, members of the public, the employee's job performance or the safe or efficient operation of the Institute. The symptoms may be exhibited in the employee's behavior and/or job performance.

Legal Drugs

Employees are permitted to take legally prescribed and/or over the counter medications consistent with appropriate medical treatment plans while performing their jobs. However, when such prescribed or over the counter drug therapies affect the employee's job performance, safety or the efficient operation of the Institute, the Chief Operating Officer **for IT**, Campus Services and Compliance, or his/her designee, or the Provost should be consulted to determine if the employee is capable of continuing to perform his/her job or if action, including corrective action or a leave from the work site, may be required.

Illegal Drugs

The use, sale, purchase, distribution, transfer or possession of an illegal drug by any employee and or student of the Institute while performing Institute business including attending classes, Institute events and student activities or while on hospital property is prohibited. This also pertains to students attending the Institute.

Alcohol

The consumption of alcohol or being unfit for duty due to consumption of alcohol, by any employee while performing Institute business or while on Institute property is prohibited. The moderate consumption of alcohol on Institute property when it is served during Institute sponsored or approved events is permitted, provided that the employee will not be subsequently performing any student related activities and provided further that this does not relieve an employee from meeting reasonable and acceptable standards of conduct.

Corrective Action

Violation of this Policy may result in corrective action up to and including discharge, even for a first offense. With respect to a member of the faculty, corrective action will be taken in accordance with the bylaws of the faculty and any other governing documents. To the extent that an employee is handicapped by virtue of his or her addiction to drugs or alcohol, this factor will be taken into account in any corrective action decisions.

Involvement of Law Enforcement Agencies

The use, sale, purchase, transfer, theft, possession or distribution of an illegal drug is a violation of the law, which will be reported by the Institute to law enforcement agencies as appropriate. All such referrals will be done only after appropriate senior management is informed. Furthermore, the Institute will comply with legal requirements for making reports to various licensing and credentialing authorities regarding certain incidents, disciplinary actions, or licensed professionals who practice while impaired.

EMERGENCY RESPONSE AND EVACUATION PROCEDURES

EMERGENCY PREPAREDNESS

(617) 726-5400 - FOR ALL EMERGENCIES (24 Hours)

The MGH Institute has established an Emergency Preparedness Team and a plan to prepare and respond to emergencies or foreseeable or unforeseeable incidents. We recognize that no institution is invulnerable to crisis situations, and accordingly, we evaluate our plan on an ongoing basis to maintain a process that is as responsive as possible to safety threats and other risks.

Through the use of Institute, MGH Police and Security <http://www.massgeneral.org/police/> Mass General Brigham, the City of Boston and other resources, the plan is intended to assist the MGH Institute community to cope with the anticipated and unforeseen needs caused by an emergency situation. The plan is also designed to provide a framework for communicating events and requirements and the resolution of each emergency to the community and public.

The plan is used for all types of emergencies including those which meet Clery Act criteria. The guidelines will apply to all members of the Institute's community, including students, faculty and staff, tenants and visitors to the Institute.

Types of Emergencies

An "emergency" is defined as any extraordinary event that endangers the Institute's community or operations. An emergency is often unexpected and sometimes tragic. An emergency may also generate community or media interest in the Institute.

An emergency may include, but is not limited to, the following situations. The conditions may present an actual, perceived, or potential threat to the Institute's students, faculty, staff, tenants, visitors, facilities or systems.

- Accidents involving students, faculty or staff
- Bomb threats
- Charlestown or Navy Yard incident requiring mutual aid from the Institute
- Environmental or natural disasters - fires, earthquakes, floods, chemical spills or leaks, explosions etc.
- Severe weather incidents
- [Medical emergency](#)
- MGH/MGB incident requiring the Institute to play a supporting role
- Political situations - riots, demonstrations, national security alerts, terrorism, etc.
- Violent crime or behavior - robbery, murder, suicide, personal injury (existing or potential), etc.

TIMELY NOTIFICATIONS

In compliance with the “Timely Notice” provisions of the federal Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act of 1998, should a situation arise from the occurrence of a *Clery Act* crime, either on or off campus, that, in the judgment of the MGH Police and Security constitutes an ongoing or continuing threat, a campus wise “timely warning” will be issued. The warning will be issued through the Institute e-mail system to students, faculty, and staff.

EMERGENCY NOTIFICATION SYSTEM

The plan assumes that if an emergency requires an immediate response, such actions will be taken without delay in order to safeguard lives and property. These actions will be reported to the President and Vice President for Finance and Administration immediately.

An alert will be sent to the MGH Institute community through its emergency notification system, website, email, voicemail and by other methods as circumstances warrant. Students, faculty and staff are expected to provide and maintain current contact information through [I-ONLINE](https://www.mghihp.edu/campus-and-community-life/emergency-preparedness). <https://www.mghihp.edu/campus-and-community-life/emergency-preparedness>

EMERGENCY PREPAREDNESS TEAM

The Emergency Preparedness Team is created by and reports to the President of the Institute. The Emergency Preparedness Team must be available to respond and react as a team in crisis or emergency situations. The Team will be required to meet at least every six months to review the plan and update information.

The Institute Emergency Team consists of the following members and is responsible for the overall assessment, coordination and institutional responses to a crisis include:

Title	Emergency Preparedness Team Role
President	President
Chief Operating Officer for Information Technology, Campus Services & Compliance	Primary Emergency Coordinator
V.P. for Finance & Administration Provost	Back-up Primary Emergency Coordinator #1
& V.P. for Academic Affairs Chief	Back-up Primary Emergency Coordinator #2
Communications Officer	Communications Leader

Team Leaders responsible for coordinating specific communications and tasks include:

Associate Vice President for Human Resources	Human Resources Team Leader
Director Enterprise Software Applications	Information Services Team Leader
Dean of Student and Alumni Services	Team Leader
Campus Services Manager	Campus Services Team Leader
Chief Communications & Marketing Officer	Communications Team Leader
MGH Security Operations Manager	Primary Liaison to Team

RESOURCES for Employees:

Charlestown Navy Yard Police Dispatch: (617) 726-5400 (24 hours)
Main Campus Police Dispatch: (617) 726-2121 (24 hours)
Occupational Health: (617) 726-2217
HAVEN Program: (617) 724-0054
SAFELINK (Shelter information): (877) 785-2020
Employee Assistance Program: (617) 726-6976
Institute Human Resources: (617) 724-3018
www.eap.partners.org

Employees who need assistance in dealing with alcohol and drug-related concerns—including their own use and/or that of a family member, friend or colleague—may contact their Human Resources Generalist for information and appropriate referrals, including our Employee Assistance Program (EAP). EAP provides confidential problem-assessment services, counseling, treatment referrals, follow-up services, and on-going training and support for managers and supervisors.

Sex Offender Registry Board (SORB) contact information:
<http://www.mass.gov/eopss/agencies/sorb/>

RESOURCES for Students of MGH Institute of Health Professions:

Charlestown Navy Yard Police Dispatch: (617) 726-5400 (24 hours)
Main Campus Police Dispatch: (617) 726-2121 (24 hours)
MGH Institute of Health Professions Office of Student Affairs (617) 726-3140
HAVEN Program: (617) 724-0054
SAFELINK (Shelter information): (877) 785-2020
Employee Assistance Program: (617) 726-6976
www.eap.partners.org

Copies of brochures from the Employee Assistance Program are available at the lobby security desks of the Catherine Filene Shouse Building and 2CW and the Office of Student and Alumni Services.

Ongoing educational requirements for all new employees and students:

Active Shooter *and* Title IX education video.

