

Miriam College

# SAFE SPACES PRIMER



## MESSAGE FROM THE PRESIDENT

# Creating Safe Spaces

This *Primer on Safe Spaces* is a compilation and an expansion of guidelines, rules, and sanctions on all acts of sexual harassment. Such acts cover areas on and off campus or any place where there is an ongoing school-related activity or program. It should be noted that safe space offenses do not refer only to those committed by superiors toward subordinates but also vice-versa. Under the expanded laws, any member of any institution can be accused of harassment towards another regardless of age, gender, seniority, position, level, or relationship that the offender has in relation to the victim. The coverage of possible offenses is thorough enough to cover any possible loophole.

This Primer is written in simple language, with topics arranged in relation to one another, for all members of the community to understand. What is also important in this Primer is the description of the steps on reporting, the safe and confidential means of reporting untoward incidents to prevent abuses. These are the safe line system through phones and the safe spaces email, in addition to the usual means of reaching out to teachers or administrators who are in a position to start an investigation or to provide support to any party needing such. Related to this is the obligation of everyone to report or at least to alert concerned administrators or middle managers of potential or actual abuses.

Although the offense of bullying is not included in this Primer, I wish to include bullying and verbal harassment and abuse in the list of offenses that should be eliminated from the environment of the MC Community. We can do this if we all become more respectful of one another's rights and dignity as persons. Then can we truly say with pride, "MC is a safe space!"



**Amb. Laura Quiambao-Del Rosario**  
President, Miriam College

# Miriam College

## **SAFE SPACES PRIMER**

### **I. PURPOSE**

#### **What is the purpose of the Safe Space Primer?**

This primer presents a detailed guide for all Miriam College employees and students on what to do and on what actions they can take should they or someone they know encounter incidents of Gender-Based Sexual Harassment (GBSH) within spaces covered by the school. This primer will mainly cover the procedures and steps that individuals or groups may take in reporting and filing a complaint, using the different mechanisms and channels provided by the school. It will also cover relevant information relating to investigation, hearing, and deciding a case, as well as options a Complainant and a Respondent have should they decide to appeal a decision.

Note that the Primer may be subject to change and may be updated from time to time as the Institutional Committee on Ethics and Protocol (ICEP) and the Committee on Decorum and Investigation (CODI) continue to review policies and guidelines of the school in relation to the Safe Spaces Act and to previous and current cases being handled.

#### **What is Miriam College's responsibility?**

As a premier learning institution, Miriam College values the dignity of every human person, respects human rights, believes in the role of women in nation-building, and upholds the fundamental equality before the law of men and women. As such, the school is committed to creating a safe space environment for all members of its community that is free from discrimination and harassment. It is also committed to truth and will ensure prompt investigation of all allegations of harassment that happens on its campus in a fair and objective manner.

### **II. SCOPE**

#### **What offenses are covered by the primer?**

This primer covers gender-based sexual harassment (GBSH) and online sexual harassment concerning students and employees.

The Safe Space Act (R.A. 11313) defines GBSH as a form of harassment that is based on sex, sex-stereotyping, sexual orientation or gender identity. It can come in these forms:

- Verbal (i.e. catcalling, sexual jokes, homophobic remarks)
- Nonverbal (i.e. intrusive gazing, stalking, and cyberstalking, incessant messaging)
- Graphic (i.e. sharing inappropriate images or videos such as gifs or unauthorized sharing of photos and videos)
- Physical aggression (i.e., unwelcome sexual advances, demand for sexual favors)
- Intimidation (i.e. threatening a person through private messaging or online comments)
- Hostile conduct (i.e. psychological and emotional threats)

This form of harassment involves conduct of a sexual nature that causes or likely to cause the following to a person:

- mental, emotional or psychological distress
- fear of personal safety such as sexual harassment acts committed through nonconsensual, unwanted, or uninvited sexual action
- fear of personal safety for remarks against any person regardless of the motive for committing such action or remarks

More examples of these offenses may be found in this [link](#).

Incidents of GBSH are also provided under the following:

- A. R.A. No. 11313 and Sections 5, 13, and 18 of its IRR (Safe Spaces Act)
- B. R.A. No. 7877 (Anti-Sexual Harassment Act of 1995)
- C. Department of Education (DepEd) Order No. 40, 2. 2012 (Child Protection Policy)
- D. Miriam College's Policy Against Sexual Harassment

### **Who can commit these offenses?**

Under the Anti-Sexual Harassment Act of 1995 (RA7877), an offender is a person who has authority, influence or moral ascendancy over another (i.e principals, school heads, teachers, instructors, professors, coaches). This definition has since been expanded under the Safe Space Act of 2019 where it states that anyone can be an offender, regardless of age, sex, or status.

In training and educational institutions, sexual harassment is committed:

- a. Against a student, trainee by a faculty, trainer, coach, or employee;
- b. Against a faculty, trainer, or coach by a student or trainee or employee;
- c. Against a subordinate by a supervisor;
- d. Against a supervisor by a subordinate;
- e. Against peers by classmates or friends or co-employees;

- f. Against third party service providers and suppliers and other stakeholders by students, faculty, and co-workers; and
- g. Against students, employees by third party service providers and suppliers and other stakeholders.

### **Can students who are minors be held liable for GBSH acts?**

Minor students who are found to have committed acts of GBSH shall only be held liable for administrative sanctions as stated in the School Handbook.

### **What possible places/areas can these offenses be committed?**

In the context of Miriam College, anywhere within its premises covering its branches in MC Nuvali and MC Alviera, including organizations, companies, on-the-job sites which the school has partnered with for its students', faculty members', and employees' internship, apprenticeship, seminars/workshops, or training and development. It can also cover outsourced services such as school buses, canteen concessionaires, and janitorial and security services, among others.

Examples of places where GBSH may occur that is within Miriam College's jurisdiction:

1. Offices
2. Classrooms
3. Chapel
4. Canteen
5. School club hangouts or offices on campus
6. Inside a school bus
7. Faculty Rooms
8. Laboratories
9. A partner school abroad or locally where a student is doing her internship or attending an event
10. A partner company where a student is doing her OJT
11. A company where a faculty may be attending a workshop
12. A place visited during a field trip

### **Who can complain?**

Employees; students or those undergoing training, instruction, or education; third party service providers; suppliers; applicants for employment; and other relevant stakeholders of Miriam College can report or file a complaint for GBSH or sexual violence. These complaints can be filed through the following:

- Regular channels or designated offices identified by the school
- Safeline, an anonymous and confidential telephone service
- Safe Spaces email: [safespaces@mc.edu.ph](mailto:safespaces@mc.edu.ph)

How these different mechanisms work are further explained in the next section.

### **III. REPORTING AN INCIDENT**

#### **How do I report a complaint and in what form?**

The school has three mechanisms in place where incidents of GBSH or sexual violence may be reported. Each mechanism upholds the safe space definition that every person is respected, handled, and accommodated with no judgement or no discrimination in relation to gender, age, race, social standing, and experiences.

#### **(1) REGULAR CHANNELS**

The different members of the Miriam College community may approach these designated offices to report incidents of GBSH:

- a. Students may report to the Student Council and Office of Student Affairs
- b. Parents may report to the Office of the Principal (for the Basic Education Unit) or Office of the Dean (for the Higher Education Unit)
- c. Employees may report to the Human Resources Division
- d. Third party service providers and suppliers may report to the Administrative Service Office
- e. Alumni may report to the Alumni Engagement Office

Should the following offices know or reasonably know that acts of GBSH or sexual violence could have been committed and have created a hostile environment, said offices must take immediate action to eliminate the same acts, prevent their recurrence, and address their effects.

To this end, the following offices shall include the conduct of an investigation, on its own initiative, and referral of offended party for appropriate psychosocial or medical services.

Upon the receipt of report or complaint, the designated offices will determine if the complainant needs immediate assistance (e.g., counseling, medical services, etc.), and shall ensure that these are provided if the complainant chooses to avail of such.

**(2) MC SAFE SPACES EMAIL: [safespaces@mc.edu.ph](mailto:safespaces@mc.edu.ph)**

This is a dedicated email where student and employees may report incidents, violations, or concerns related to safe spaces. Senders have the option to report an incident or file a complaint anonymously or otherwise. Either way, complainants are assured that every report will be treated with utmost confidentiality.

Once you have emailed a report, a counselor will be at the receiving end and will email you back questions related to the incident that will guide the school in its investigation. A coordinator will be responsible for directing the complaint to the proper committee/ services for case management which may be any of the following:

- Institutional Committee on Decorum and Investigation (CODI)
- Employee Discipline Committee
- Unit-level discipline committees
- Institutional counseling services
- Unit-level guidance and counseling services

**(3) MC SAFELINE**

**GLOBE:** 0917 - 706 1376 or 0917 - 706 1545  
**SMART:** 0918 - 964 5301 or 0998 - 982 0537  
**CALL OPERATIONS:** Mondays - Fridays • 3:00 pm – 10:00 pm

MC *Safeline* is an anonymous and confidential telephone service for MC students, faculty, and staff to report incidents, violations, or concerns related to safe spaces. *Safeline* also offers advice and support and refer callers to appropriate resources or services for further information and support.

A counselor will receive the call and will be responsible for directing the complaint to the proper committee/services for case management. These include the following:

- Institutional Committee on Decorum and Investigation (CODI)
- Employee Discipline Committee
- Unit-level discipline committees
- Institutional counseling services
- Unit-level guidance and counseling services

*Safeline* call operations will be from Mondays-Fridays, 3:00 pm–10:00 pm to facilitate convenience and privacy for the caller.

Should the caller need counseling support, the Coordinator will refer him/her to an internal guidance and counseling services or to an external resource. The *Safeline* service will also provide information on the ways the school handles issues related to other safe space concerns and violations, such as bullying and social media abuse.

### **How will Safeline handle anonymous callers?**

Whether a caller is anonymous or not, he/she will be given a case number, which will be used to confirm that the report has been received and will be acted on. Anonymous callers will be asked to contact *Safeline* after a given period to be informed of actions that will be taken. Expect the counselor on the other end of the line to ask a couple of questions related to the incident that will guide the school in investigating the case.

### **How do the aforementioned mechanisms ensure fair handling of both Complainant and Respondent?**

It is the school's responsibility to uphold both the Complainant's and Respondent's rights and privacy from the moment a report is made and all throughout the process of investigation, hearing, and decision. Given this, Miriam College made sure that all the reporting mechanisms have their respective case management protocols that are guided by the principles of due process and fair investigation. Such protocols will include safeguards against and proper handling of false accusations.

## **IV. FILING A COMPLAINT**

### **What is expected of me once I have filed a complaint?**

After reporting an incident through any of the mechanisms provided by the school, the coordinator will guide the complainant in the formal filing of a complaint. This complaint will be filed in writing and endorsed to the Institutional Committee on Decorum and Investigation (CODI) within 48 hours. The following will be asked of you:

- Full name
- Position
- Address and contact details
- Parent(s) or legal guardian, if you are a minor
- Full name, position, and contact details (if known) of the party being complained about ("Respondent")
- The full name and mother unit, office, or department where the alleged offender is assigned (if known)
- The full name and mother unit, office, or department where complainant is assigned (if employee) and full name and grade/year level (if student). Information about the complainant will be for the use of the committee members only if the complainant wants to remain anonymous.
- A brief statement of the relevant and material facts and evidence
- Additional evidence and witness/es

Within five (5) days from receipt of the complaint referral, a hearing for the complainant will be scheduled. In cases involving a student, a counselor may sit in or accompany him/her during the hearings, if there is a need or request to do so.

### **Can someone else file a complaint on behalf of another student/faculty/employee?**

Yes, anyone can file a complaint on behalf of someone who has experienced incidents of GBSH, online sexual harassment, or sexual violence. As stated in the Safe Spaces Act, even if the individual does not file a complaint or does not request that the school take action, the school is duty-bound to act and resolve the situation as long as school authorities have knowledge or reasonably know about a possible or impending act of GBSH or sexual violence. It is the school's duty to take immediate action to eliminate the same acts, prevent their recurrence, and address their effects.

### **I am a Respondent, what is expected of me?**

(1) If a complaint has been filed against you, you will be contacted by the coordinator and informed about the complaint made against you. The coordinator will also ask for the following:

- Full name
- Position
- Address and contact details
- Parent(s) or legal guardian, if you are a minor
- Evidence and present witnesses

(2) You will be given a Notice to Explain and upon receipt, you will be given a period of three (3) working days to submit your written and duly signed answer. If you do not file a response within the given period without justifiable cause, this right will be waived.

(3) In cases where the Respondent is a minor, the Notice to Explain will be given in the presence of a parent, guardian, or counselor

### **How long after a GBSH offense has been committed should a complaint be filed?**

Ideally, GBSH complaints should be filed at the earliest time possible so the school can immediately act on it and prevent another incident from recurring. The school, however, understands that reporting incidents of GBSH are not always easy for an individual or group because of stigma or shame, possible retaliation from the offender, not wanting to let the parents know, or for fear of being blamed for the incident, among many other reasons. This is why the school has provided mechanisms that remove these possible blocks and allow a person to report and file a complaint without fear at whatever time for as long as the student and employee are still connected with the school.

## **V. INVESTIGATION AND HEARING**

### **What happens during the investigation of a case?**

Separate interviews/hearings shall be conducted to allow the Committee to clarify and ask questions from both the Complainant and the Respondent, relevant witnesses, and resource persons. This would also allow all the parties involved to present their additional evidence and other matters concerning the incident.

To the extent possible, employers may also include the provision of support especially for victims of GBSH such as psychological or psychosocial counseling services, or referral to such services, and assistance in the filing of administrative, civil, and/or criminal case/s.

### **If I am a Respondent who is an employee of the school, can I still submit my resignation letter even if a case was filed against me?**

In case the Respondent is an employee of Miriam College, and he/she should resign at any time while the case is ongoing, the decision of Miriam College shall be deferred until the Committee resolves the complaint. The school shall have the option to terminate the Respondent's employment for just cause, depending on the outcome of the case and based on the school's policies and regulations.

### **Can a lawyer be present during the course of the hearing and what is the extent of his/her participation?**

Yes, a lawyer or a representative of a Complainant or a Respondent is allowed to be present during a hearing. However, only the Complainant or Respondent will be allowed to speak to or address the Committee, but they may seek advice or confer with their lawyers or representatives as they may deem necessary.

Representatives or lawyers shall be strictly prohibited from recording any or all of the proceedings before the Committee in any form (e.g. screenshot, video, audio). Any recording shall only be done by the Committee Secretariat. Any violation of this rule by the representative or lawyer shall be reported to the Human Resources Director of Miriam College who shall perform the appropriate actions necessary to address the issue.

### **What happens after a hearing?**

Minutes of hearings will be made available to both Complainant and Respondent for review or comments the following day. Both parties should submit their comments or questions the day after the minutes is received. If they fail to do so within the given period, it will be presumed that they agree to the contents of the minutes.

**If I decide to withdraw my complaint in the middle of an investigation, what will happen to my case?**

Withdrawal of a complaint may be allowed at any stage. However, this will not prevent the school or the Committee from investigating and making a recommendation on the case especially if there is compelling evidence to do so.

## **VI. CONFIDENTIALITY AND PRIVACY**

**How will my privacy be protected from the time of complaint, during the hearing, and by the time a decision is made?**

Parties participating in any of the proceedings shall be made to sign a non-disclosure agreement, taking into consideration the privacy and general well-being of all concerned.

Neither Complainant nor Respondent can disclose matters from the proceedings to guarantee confidentiality to the greatest extent possible as mandated by Section 22 (c) (8) under the Safe Spaces Act.

**Once a Respondent is informed about a complaint, how will the school protect the Complainant from possible retaliation?**

**The following support services shall be made available:**

1. Miriam College shall provide all possible support services to employees, faculty members, and students who are who are complainants of sexual harassment such as but not limited to counseling, and/or medical services, and coordination with law enforcement should the complainant choose to avail of such.
2. In the event that the Complainant decides to go to court, it shall be incumbent upon Miriam College to make the proper referral for legal assistance.
3. The school shall cooperate in court proceedings as may be required through appearances and/or provision of documents/records.
4. The school shall give due consideration to parties involved in court proceedings with respect to school or work requirements, such as excusing their absences from classes when they need to attend court hearings.

**The following mechanism will be applicable to a Respondent to ensure the protection of a Complainant:**

1. Employees will be asked to go on leave.
2. Preventive suspension may be imposed. In such cases, the employee is informed of the alleged infraction and is asked not to report for work pending investigation. Meantime, the immediate supervisor should retrieve the employee's ID card,

- departmental keys and other vital documents entrusted to her/him. During the preventive suspension the employee is not compensated. The compensation of the employee is reinstated retroactively if s/he is proven innocent.
3. Students will be offered alternative learning platforms and/or transfer of section.
  4. Employees of third-party service providers will be asked to disengage from MC.

## **V. DECISION, APPEAL, AND SANCTIONS**

### **Who will hear and decide on the case?**

Members of the CODI will be handling all GBSH and online sexual harassment-related cases of the school. Their formation is in compliance with the Safe Spaces Act's Implementing Rules and Regulations (IRR). All members of the committee undergo continuing training on gender sensitivity, gender-based violence, sexual orientation, gender identity and expression, and other gender and development (GAD) topics as needed. They are composed of a legal adviser to the CODI and representatives from the following sectors:

- Parents
- Alumni
- Students
- Administration
- Faculty

In the event that at least two members of the Committee would inhibit himself/herself for just cause in any of the cases, alternates for those members will be brought in to replace the concerned members.

### **How long will it take for them to make the decision?**

The Committee will formulate its recommendation within ten (10) days after the investigation and deliberation. A vote of the majority of the Committee members shall be required to approve the Committee recommendation, its findings, and proposed sanction(s), if any.

### **What disciplinary sanctions may apply if a respondent is found liable?**

The appropriate penalties for the offense will be determined and carried out by the Human Resources Division, as appropriate, based on the school's Policy on Sexual Harassment. Since the School commits to zero tolerance of any and all forms of sexual harassment, the following disciplinary sanctions for the commission of sexual harassment may apply:

1. Students will be stripped of their diploma or will be issued an expulsion order consistent with the guidelines set out by the Commission on Higher Education, TESDA, and Department of Education. On the other hand, students who are

- minors and who are found to have committed acts of GBSH shall only be held liable for administrative sanctions as stated in the School handbook.
2. Employees may be sanctioned with the following: termination which will be reflected in his/her Certificate of Employment, disclosure of decision to future employers, non-issuance of recommendation.
  3. Third Party Service Provider and Suppliers will face termination of engagement and will be blacklisted in Miriam College.
  4. Other stakeholders will be blacklisted in Miriam College.

### **How will the decision be carried out and is an appeal still possible after that?**

The Committee recommendation will be endorsed to the school President for approval. The latter shall act on the recommendation and issue a decision within seven (7) days from receipt of said document.

The President's decision is considered final. A copy of the decision will be sent through registered mail/local courier and e-mail (if available) to all parties concerned.

An appeal may still be made even after a decision. The parties will be given a period of five (5) working days from receipt of the decision to make the appeal to the Institutional Appeals Committee. Failure to appeal the aforementioned decision within the given period shall render the same final and executory and non-appealable.

The decision on the appeal will be communicated to the Complainant and Respondent through the following:

- Human Resources Division for employees and third-party service providers
- Unit Head for students and parents
- Alumni Engagement Office for alumni

Once final, designated representatives shall provide copies of the decision to the Direct Supervisor and Unit Head of the Respondent and Complainant and to the parent of student, as well as the Human Resources Division and designated offices to receive complaints as identified herein.

## DEFINITION OF TERMS

**Complainant** – Refers to the party filing a complaint for an incident/s related to GBSH.

**Respondent** – Refers to the party being complained about for an incident/s related to GBSH.

**Minor** – Children who are below eighteen (18) years old (R.A. 6809).

**Mechanism** – Refers to channels available to the school that a complainant may use or approach to report incidents of GBSH, online sexual harassment, or sexual violence. This may be in the form of an email, telephone, or a designated person they may approach personally like a Grade Level Coordinator, Homeroom Teacher, or Guidance Counselor.

**Committee** – Refers to the independent multi-sectoral Committee on Decorum and Investigation (CODI), with representatives from the administration, faculty, parents and students and created for the purpose of handling and investigating gender-based sexual harassment complaints

**MC Employee** – Any person who holds an official appointment or designation in Miriam College. These covers those with or without remuneration, those who belong to any unit or office whether academic or administrative, and those who are contractual or project-based.

**Student** – A person duly enrolled for any of the following: (a) a degree course; (b) certificate course; (c) short-term review; (d) short-term training; or (e) cross-registration in any of the academic units, institutes, or training centers of Miriam College.

**Employer** - A person who exercises control over an employee.

**Faculty** - Any member of the teaching staff of Miriam College, regardless of academic rank or category and includes the librarian, guidance counselor, researcher or research associate, coach, trainer, or training specialist, and extension worker.

**Safe Spaces** - A place or an environment where a person is respected, secured, could show and communicate their true self where there is genuine care, support system, sensitivity, equality, no judgment and no discrimination of one's gender, age, race, social standing, and experiences.

**Gender-based sexual harassment (GBSH)** - Refers to any criminal and/or unethical acts or unacceptable behavior consisting of unwanted sexual actions or remarks against a particular person, regardless of motive or intent, whether verbal, physical, or through the use of technology that causes or are likely to cause mental and emotional or psychological distress and fear of personal safety. These may also consist of any act or behavior that may otherwise create a hostile, intimidating or offensive environment for the student.

**Gender-based online sexual harassment** - An online conduct targeted at a particular person that causes or likely to cause another mental, emotional or psychological distress, and fear of personal safety, sexual harassment acts including unwanted sexual remarks and comments, threats, uploading or sharing of one's photos without consent, video and audio recordings, cyberstalking and online identity theft.

**Catcalling** - Refers to unwanted remarks directed towards a person, commonly done in the form of wolf-whistling and misogynistic, transphobic, homophobic, and sexist slurs.

**Common carriers** - Refer to persons, corporations, firms, or associations engaged in the business of carrying or transporting passengers or goods or both, by land, water, or air, for compensation, offering their services to the public.

**Gender** - Refers to a set of socially ascribed characteristics, norms, roles, attitudes, values, and expectations identifying the social behavior of men and women, and the relations between them.

**Gender identity and / or expression** - Refers to the personal sense of identity as characterized, among others, by manner of clothing, inclinations, and behavior in relation to masculine or feminine conventions. A person may have a male or female identity with physiological characteristics of the opposite sex, or may have been assigned a particular sex at birth but who identifies with the opposite sex, or may have an identity that does not correspond to one's sex assigned at birth or to one's primary or secondary sex characteristics, in which case this person is considered transgender.

**Homophobic remarks or slurs** – Refers to any statements in whatever form or however delivered, which are indicative of fear, hatred or aversion towards persons who are perceived to be or actually identify as lesbian, gay, bisexual, queer, pansexual and such other persons of diverse sexual orientation, gender identity or expression, or towards any person perceived to or actually have experienced same-sex attraction.

**Information and communication system** - Refers to a system for generating, sending, receiving, storing or otherwise processing electronic data messages or electronic documents and includes the computer system or other similar devices by or in which data are recorded or stored and any procedure related to the recording or storage of electronic data messages or electronic documents.

**Information and Communications Technology or ICT** - The totality of electronic means to access, create, collect, store, process, receive, transmit, present, and disseminate information.

**Misogynistic remarks or slurs** - Any statements in whatever form or however delivered, that are indicative of the feeling of hating women or the belief that men are inherently better than women.

**Public spaces** - Refers to streets and alleys, roads, sidewalks, public parks, buildings, Schools, churches, public washrooms, malls, internet shops, restaurants and cafes, transportation terminals, public markets, spaces used as evacuation centers, government offices, common carriers, public utility vehicles (PUVs) as well as private vehicles covered by app-based transport network services, other recreational spaces such as, but not limited to, cinema halls, theaters and spas, bars and clubs, resorts and water parks, hotels and casinos, and all other areas, regardless of ownership, openly accessible or offered to be accessed by the public.

**Sexist remarks or slurs** - Are statements in whatever form or however delivered, that are indicative of prejudice, stereotyping, or discrimination on the basis of sex, typically against women.

**Transphobic remarks or slurs** - Any statements in whatever form or however delivered, that are indicative of fear, hatred, or aversion towards persons whose gender identity and/or expression do not conform with their sex assigned at birth.

**Stalking** - Refers to conduct directed at a person involving the repeated visual, or physical proximity, non-consensual communication, or a combination thereof that cause or will likely cause a person to fear for one's own safety or the safety of others, or to suffer emotional distress.

**Cyberstalking** - A form of stalking that is committed through an electronic medium in which online communication takes place.

## ACRONYMS

**CODI** – Committee on Decorum and Investigation

**GBSH** – Gender-based Sexual Harassment

# Miriam College **SAFE SPACES**

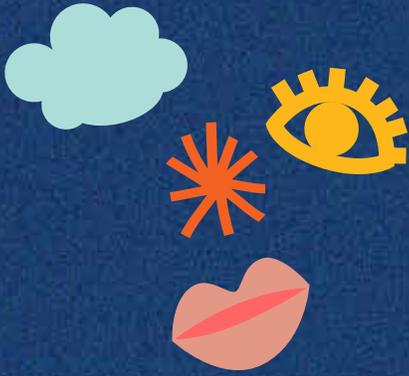
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