

CLERY COMPLIANCE POLICY

University of Wisconsin Oshkosh

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PURPOSE:

To outline how UW Oshkosh will comply with the “Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act.”

BACKGROUND:

The federal “**Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act**” (**Clery Act**), 20 USC § 1092(f), requires colleges and universities receiving federal financial aid to disclose campus safety information, and imposes certain basic requirements for handling incidents of sexual violence and emergency situations. Disclosures about crime statistics and summaries of security policies are made once a year in an Annual Security Report (ASR), and information about specific crimes and emergencies is made publicly available on a timely and ongoing basis throughout the year.

DEFINITIONS:

Campus Security Authority (CSA) – Individuals (paid or volunteer) at UW Oshkosh who, because of their function at the university, are obligated under the Clery Act to notify the Dispatch Supervisor/Records Custodian at the UW Oshkosh Police Department of alleged Clery Crimes that have been reported to them or alleged Clery Crimes that they have directly witnessed. These individuals and organizations fall into one of four groups:

1. A member of the UW Oshkosh Police Department.
2. Individuals who have responsibility for campus security but who are not members of the UW Oshkosh Police Department. Examples include student employees or volunteers who provide security or monitor access to any campus facility (an athletic field, a residence hall, etc.) and groups contracted by UW Oshkosh to provide event security and members of a safety escort service.
3. An individual or organization specified in UW Oshkosh’s policies as “an individual or organization to which students and employees should report criminal offenses.”
4. Officials who have “significant responsibility for student and campus activities, including, but not limited to, student housing, student discipline and campus judicial proceedings.”

Examples of CSAs include the UW Oshkosh Police Department, Dean and Assistant Dean of Students, Director and Assistant Directors of Residence Life, Residence Hall Directors, Assistant Residence Hall Directors, Community Advisors, Athletic Directors and Coaches, Faculty Advisors to student organizations, Student Activities Coordinators, Coordinators of Greek Affairs, and the Title IX Coordinator.

Clery Act Crimes – Crimes outlined under the Clery Act that the university is required to report annually to all currently enrolled students, all employees, and the Department of Education’s Office of Postsecondary Education. These include “criminal homicide, (including murder and non-negligent manslaughter; and manslaughter by negligence); sexual assault (including rape, fondling, incest and statutory rape); robbery; aggravated assault; burglary; motor vehicle theft; and arson;” hate crimes for “any of the above-mentioned offenses, and any incidents of larceny-theft, simple assault, intimidation, or destruction/damage/vandalism of property that were motivated by bias;” VAWA offenses, such as “domestic violence, dating violence and stalking; and “arrests and referrals for disciplinary action for weapons law violations, drug abuse violations and liquor law violations.”

Clery Compliance Committee – Committee comprised of representatives from the University Police Department, the Dean of Students Office, Residence Life and Equal Opportunity and Access, which prepares the Annual Security Report (ASR) and the Annual Fire Safety Report (AFSR).

Emergency Notification – Immediate notification to the campus community “upon confirmation of a significant emergency or dangerous situation occurring on the campus that involves an immediate threat to the health or safety of students or employees.” Examples include a fire, a weather emergency, a natural disaster, an infectious disease outbreak, terrorist incident, explosion, or rioting.

Missing Student Notification – The university is required under the Clery Act to “initiate specific notification procedures [within] 24 hours after receiving information [that] a student in on-campus student housing is determined to have been missing for 24 hours.”

Timely Warning – Timely notification to the campus community of all Clery Act crimes that occur on UW Oshkosh’s Clery Act geography “that are reported to campus security authorities or local police agencies and considered by the university to represent a serious or continuing threat to students and employees.”

POLICY:

In accordance with the requirements of the Clery Act, UW Oshkosh shall:

1. The UW Oshkosh Police Department will issue timely warnings through the Titan Alert system to alert the campus community regarding any Clery Act crime that occurs on Clery Act geography that is reported to campus security authorities or local police agencies and is considered to represent a serious or continuing threat to students and employees.
2. The UW Oshkosh Police Department will immediately issue emergency notifications to notify the campus community through the Titan Alert system upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus.
3. Provide written emergency response and evacuation procedures to students and employees the emergency procedures guide which is distributed to all campus departments annually and through the emergency.uwosh.edu web page.

4. Maintain a daily crime log of all alleged crimes reported to the University Police, and make this log is available for review by the public through a link on the police.uwosh.edu website.
5. Maintain a daily fire log of all fire-related incidents reported in an on-campus student housing facility, and this log is available for review by the public through a link on the police.uwosh.edu website.
6. Identify employees and students as Campus Security Authorities (CSAs), notify these individuals of their obligations under the Clery Act to report any and all Clery Act crimes that they witness or are reported to them to the UW Oshkosh Police Department Dispatch Supervisor/Records Supervisor, train these individuals, and collect these statistics.
7. Collect and disclose statistics for reported Clery Act crimes for UW Oshkosh's Clery geography (on campus, in or on non-campus buildings or property, and on public property within or immediately bordering and accessible from campus).
8. Collect and disclose statistics for reported fires in on-campus student housing facilities.
9. Publish and distribute the ASR and AFSR by October 1 to all enrolled students and employees, and provide notice of availability of the report to all prospective students and employees. The reports will contain Clery Act crime statistics, fire statistics in on-campus housing facilities, and University policies addressing campus security and safety.
10. Submit the Clery Act crime statistics and on-campus student housing facilities fire statistics from the ASR and AFSR to the Department of Education via an annual Web-based data collection statements.
11. In collaboration with the appropriate campus departments, create, establish and conduct programs to educate the campus and surrounding community and to promote general awareness of all crime and safety-related issues.
12. Within 24 hours of receiving a report of a student who lives in on-campus student housing and is determined to have been missing for 24 hours, contact local law enforcement and notify emergency contact person(s) of that student. Include the missing student notification policy and procedures in the ASR and AFSR.

RESPONSIBILITIES:

All University Faculty, Staff, Students and Visitors on University Facilities or Property:

- Promptly report any activity that is perceived as a criminal, potentially dangerous or suspicious to a Campus Security Authority (CSA).

Clery Compliance Committee:

- Meet on a monthly basis to reconcile Clery Crime data and prepare for the Annual Security Report (ASR) and Annual Fire Safety Report (ASFR).
- Obtain Clery Crime and conduct referral data from the University Police Department, the Dean of Students Office, the Department of Residence Life and Equal Opportunity and Access.
- Compile data on Clery Crimes reported for the university's campus, non-campus and public property.
- Retain supporting documentation related to these responsibilities.
- Work with other campus offices to establish Clery Act-related educational programs and promotion of safety awareness programs.
- Review and recommend CSA training program(s)

- Review job descriptions to designate CSA's and work with HR to amend job descriptions as necessary and notify employees if designated as a CSA of such status and responsibilities.

University Police Department:

- Issue appropriate timely warnings to the campus community about Clery Crimes through the Titan Alert System.
- Issue emergency notifications to the campus community through the Titan Alert System when deemed necessary and appropriate.
- Maintain a daily crime log of all crimes reported. This log is available for review at the police.uwosh.edu website.
- Maintain a daily fire log of all fire-related incidents reported. This log is available for review at the police.uwosh.edu website.
- Annually obtain from Facilities Management any updates on campus and non-campus property to produce a Clery geography map.
- Work with outside law enforcement agencies to obtain Clery Crime data for the university's Clery Act geography.
- Compile and provide to the Clery Compliance Committee data on Clery Crimes reported for on Clery Act geography
- Retain supporting documentation related to these responsibilities.
- Work with the Clery Compliance Committee to establish Clery Act-related educational programs and promotion of safety awareness programs.

Dean of Students Office:

- Compile and provide conduct referral data to the Clery Compliance Committee.
- Obtain information from campus-wide departments and offices that pertain to Clery Act-related educational programs and safety awareness programs.
- Annually prepare and disclose/report to the campus community and the public through the Annual Security Report (ASR) and the Annual Fire Safety Report (ASFR): Clery Crime data, fire incident data, security policies and procedures to protect the community, and information on the handling of threats, emergencies and dangerous situations.
- Annually report to the Department of Education disclosing Clery Crime data reported over the past three years.
- Retain supporting documentation related to these responsibilities.
- Work with the Clery Compliance Committee to establish Clery Act-related educational programs and promotion of safety awareness programs.

Office of Equal Opportunity and Access:

- Provide regular, mandatory training for all Campus Security Authorities (CSAs).
- Collect and provide CSA reports to the Clery Compliance Committee.
- Maintain a comprehensive list of campus CSA's; review and update list annually.

Department of Residence Life:

- Compile and provide conduct referral data to the Clery Compliance Committee.
- Annually conduct fire drills in all on-campus student housing.

- Annually provide to the University Police Department the following information for submission in the Annual Security Report (ASR) and the Annual Fire Safety Report (ASFR):
 - documentation of fire drills
 - fire safety system information for all on-campus student housing
 - student housing policies regarding portable electrical appliances, smoking, and open flames
 - procedures for student housing evacuation
 - fire safety education and training
 - plans for future improvements for fire safety in on-campus student housing
 - missing student notification policy
- Retain supporting documentation related to these responsibilities.
- Work with the Clery Compliance Committee to establish Clery Act-related educational programs and promotion of safety awareness programs.

Campus Security Authorities (CSAs):

- Participate in CSA training.
- Record on the CSA report form alleged Clery Crimes that have been reported to them or alleged Clery Crimes that they have directly witnessed.
- Annually submit CSA report forms to the University Police Department.