**Campus Safety Department** 

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| General Order (GO) No: **2.35** | Supersedes: N/A |
| Effective Date: 8/23/2023 | Relates/Refers to GO: **CSA Moodle Course, CSA in-person training presentation, CSA crime reporting form, CSA List** |
| Subject: **Campus Security Authorities** | Distribution: **Department Administration** |
| Revised: 8/24/2023 | Is GO on the website: No |
| Is GO in the ASR: No | Is GO in Report Exec: No |
| Revision Note: 2023 Moodle course link updated. |  |

**Purpose**

In order for the College to meet its obligations to the Clery Act the College is required to identify, train, and obtain statistics for reported crimes to Campus Security Authorities (hereafter CSA). When CSA’s report information about alleged criminal activity that occurs on or near campus, it helps Nazareth take steps to ensure campus safety and to fully and accurately comply with its reporting obligations.

**Background**

“Campus security authority” is a *Clery Act*-specific term that encompasses four groups of individuals and organizations associated with an institution.

* A campus police department or a campus security department of an institution. If your institution has a campus police or security department, all individuals who work for that department are campus security authorities. A security department can be as small as one person.
* Any individual or individuals who have responsibility for campus security but who do not constitute a campus police department or a campus security department (e.g., an individual who is responsible for monitoring the entrance into institutional property). Include individuals such as those who provide security at a campus parking kiosk, monitor access into a campus facility, act as event security, such as for sporting events or large, registered parties, or escort students around campus after dark (including other students).
* Any individual or organization specified in an institution’s statement of campus security policy as an individual or organization to which students and employees should report criminal offenses.
* An official of an institution who has significant responsibility for student and campus activities, including, but not limited to, student housing, student discipline and campus judicial proceedings. An official is defined as any person who has the authority and the duty to take action or respond to particular issues on behalf of the institution.

Specific examples of individuals who meet the criteria described in the fourth bullet are listed below. Note that these examples are taken directly from [The Handbook for Campus Safety and Security Reporting: 2016 Edition](https://www2.ed.gov/admins/lead/safety/handbookfsa.pdf)

* a dean of students who oversees student housing, a student center or student extracurricular activities;
* a director of athletics, all athletic coaches (including part-time employees and graduate assistants);
* a faculty advisor to a student group;
* a student resident advisor or assistant;
* a student who monitors access to dormitories or buildings that are owned by recognized student organizations;
* a coordinator of Greek affairs;
* a Title IX coordinator;
* an ombudsperson (including student ombudspersons);
* the director of a campus health or counseling center;
* victim advocates or others who are responsible for providing victims with advocacy services, such as assisting with housing relocation, disciplinary action or court cases, etc.;
* members of a sexual assault response team (SART) or other sexual assault advocates; and
* Officers from local law enforcement who are contracted by the institution to provide campus safety-related services.

**Scope & Compliance**

This General Order applies to Nazareth University Campus Safety Department Administration and serves to document the business process related to Campus Security Authorities.

**Instructions**

**Identification of CSAs**

Campus Safety is responsible for identifying CSA’s and may collaborate with the relevant supervisor, Dean, Department Head, or Human Resources as needed to determine if an individual’s responsibilities meet the definition of a CSA.

*Considerations*

Campus Safety may consider the individual’s or office’s function at Nazareth as well as if the individual or office is listed in the 2016 Handbooks description of CSA’s. Campus Safety may also consider the individuals role at Nazareth, and whether:

* Their official job responsibilities involve significant interaction with students and/or campus activites.
* They serve as informal or unofficial mentors to students
* They serve as a member in an office or of a committee to whom students are instructed and informed to report or discuss crimes, allegations of crimes, and other troubling situations and/or
* They have oversight for disciplinary procedures

Title, pay, being a student, and whether the individual or office does not wish to be a CSA will not be considered.

*CSA exemptions*

As stated in the 2016 Handbook Pastoral Counselors and Professional Counselors functioning within the scope of their license or certification will not be identified as CSA’s. Additionally Faculty members who are not advisors of students groups (i.e., no responsibility for student or campus activities beyond the classroom), and most support staff (Facilities, Food Service, Clerical, etc…) will not be identified as CSAs.

**Notification of CSAs**

CSA’s will be notified of their responsibilities in an official correspondence from the Director of Campus Safety or designee. (Attached)

**Training CSAs**

Once CSAs have been identified they will be trained annually in their responsibilities. This training may be accomplished via electronic delivery of a moodle course, though some training may be conducted face-to-face. Specifically when training large groups of CSA’s in a single Department or field it may be prudent for Campus Safety to schedule time at various all-hands meetings including with Campus Safety, Residential Life, Athletics, and Campus Operations. The link to the moodle course will be sent directly to the CSA. For calendar year 2022 and 2022 training Campus Safety used this moodle course. <https://lms.naz.edu/course/view.php?id=43997>.

For calendar year 2023 training was done using this moodle course: <https://lms.naz.edu/course/view.php?id=76101>

For calendar year 2023 Campus Safety used this presentation for in-person training. [https://docs.google.com/presentation/d/1b7pmrxex78weQIefoiCS8LCd0QqR\_hxE/edit#slide=id.p1](https://docs.google.com/presentation/d/1b7pmrxex78weQIefoiCS8LCd0QqR_hxE/edit%23slide=id.p1)

**Obtaining statistics for reported Crimes**

After CSAs have been identified and trained they will be required to positively confirm or deny that any crimes have been reported to them. Campus Safety will send a reminder to CSA’s twice per year, generally in January and May with information on how to report crimes. For calendar year 2022 statistics Campus Safety used this form. <https://docs.google.com/forms/d/14T9XHVIh-ZimsSjMg3oqjP-vExiZwD2r9X8-Jb-JqRE/edit>

**Responsibilities**

The Clery Act requires schools to annually disclose Clery crime reports received by a Campus Security Authority or local law enforcement. These statistics are disclosed to its employees, students, and the public in an [Annual Security Report (ASR)](https://www2.naz.edu/campus-safety/report/).

In order for the College to meet its obligations to the Clery Act the College is required to identify, train, and obtain statistics for reported crimes to Campus Security Authorities. CSA crime reports are used by the school to fulfill its responsibility to annually disclose accurate crime statistics; and to issue or facilitate the issuance of timely warnings or emergency notifications for crimes that pose a serious or continuing threat to the campus community. If a crime is reported to a CSA, but goes no further than that, the school won’t have fulfilled its obligation under the law, and campus community members might not have the information they need to stay safe on campus. It is thus imperative that CSA’s collect and document relevant information regarding crime reports brought to their attention and relay reports of criminal activity to Campus Safety without delay.

**Timeline**

This GO is effective immediately upon approval.

**Reporting**

**CSA reports to Campus Safety**

Information Campus Security Authorities are required to report:

* The date/time the crime was reported to the CSA
* The date/time the crime occurred
* Information about the crime and the surrounding circumstances including where the crime occurred.

If a CSA is unsure of whether an incident is a *Clery Act* crime, or even if it’s criminal in nature, they should report it to Campus Safety.

CSA crime reports should include personally identifying information if available. This is important for law enforcement purposes and to avoid double counting crimes. Even if the Reporting Party does not want to formally report the incident to campus officials or police the Clery Act requires that CSA’s report the disclosure of a crime to the officials responsible for cataloging Clery Act crime statistics (Campus Safety).

If an individual reporting an incident needs assistance, a CSA should explain how to get help. Let a victim know that help is available even if he or she does not want an investigation conducted. The decision to act on this option is the victim’s. In the midst of an emergency situation, such as a physical assault, however, a CSA should contact Campus Safety or call 911 off campus as appropriate.

**How CSAs should report to Campus Safety**:

Nazareth College requires all CSA’s to report crime to the Campus Safety Department without delay after the crime is reported to them. CSA’s may report the crime in a number of ways:

* Using the “Report” function of the College’s Safe@Naz mobile application.
* By phoning 585-389-2850
* By emailing [campussafety@naz.edu](mailto:campussafety@naz.edu)
* In person in the Campus Safety Office – Shults 021

**What Shouldn’t a Campus Security Authority Do?**

A campus security authority is not responsible for determining authoritatively whether a crime took place—that is the function of Campus Safety. A campus security authority should not try to apprehend the alleged perpetrator of the crime or investigate the crime. That too is the responsibility of Campus Safety. It’s also not a CSA’s responsibility to try and convince a victim to contact law enforcement if the victim chooses not to do so.

**Contacts**

The Director of Campus Safety serves as Nazareth’s Clery Compliance Officer.

**Recordkeeping**

Campus Safety will be responsible for keeping a list of CSA’s to include name, title, department, email, function as relates to being a CSA as well as records that support when the individual was notified of their responsibility, trained, and when they were asked to submit reports of criminal activity that they may have received. For calendar year 2022 Campus Safety used this form. [https://docs.google.com/spreadsheets/d/1wZpkNmrgo5jQVkREd5\_0UroSxEgRwvyXn2XnHbZlDwc/edit#gid=689418836](https://docs.google.com/spreadsheets/d/1wZpkNmrgo5jQVkREd5_0UroSxEgRwvyXn2XnHbZlDwc/edit%23gid=689418836)

For Calendar year 2023 Campus Safety used this form.

[https://docs.google.com/spreadsheets/d/1cUhCrueckoRofUC20oKCfw1R9jmz1dL5v4aUjFUJXRw/edit#gid=431930903](https://docs.google.com/spreadsheets/d/1cUhCrueckoRofUC20oKCfw1R9jmz1dL5v4aUjFUJXRw/edit%23gid=431930903)

**Amendments and Revisions**

This GO may be amended or revised as needed to ensure its alignment with applicable laws, regulations, and best practices. Any proposed amendments or revisions should be communicated to the Assistant Director of Campus Safety for review and approval. This GO has been reviewed and approved by the undersigned. Any changes to this GO require the same level of review and approval before implementation.

**Approval Date**

Director of Campus Safety: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Fire and Life Safety Officer: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Assistant Director of Campus Safety: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Please acknowledge receipt and understanding of this GO by signing by August, 25 2023.

