

## CLERY ACT COMPLIANCE POLICY

<b>Policy Name:</b>	Clery Compliance Policy
<b>Policy Owner:</b>	Risk Management Coordinator
<b>Responsible University Office:</b>	Legal Affairs, Ethics & Compliance
<b>Approval Date:</b>	August 29, 2023
<b>Effective Date:</b>	August 29, 2023
<b>Policy Number:</b>	
<b>Related Policies:</b>	Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act of 1998 <a href="#">20 USC 1092 (f)</a> ; Violence Against Women Reauthorization Act of 2013 <a href="#">42 U.S. Code § 13925</a>

### I. PURPOSE AND SCOPE OF POLICY

Columbus State University (“CSU”) is committed to the goal of creating and maintaining a safe environment for its students, faculty, staff, contractors, vendors, visitors, and guests. Consistent with that commitment is the university’s compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act of 1998 ( “Clery Act”), which requires CSU to disclose crime report statistics as well as other crime and safety information to the CSU campus community in an accurate, complete and timely manner.

### II. DEFINITIONS

**CSU Campus Community:** Any individual who is a CSU student, faculty, staff, volunteer, contractor, visitor or guest.

**Annual Security and Fire Safety Report (“ASFSR”):** A required annual report distributed to the campus containing statistics for Clery Act Crimes, safety information, policy statements, and fire reports as mandated by the Clery Act.

**Campus Security Authority (“CSA”):** CSAs are individuals designated by CSU who, by virtue of their specific role or scope of employment or volunteer engagements outside of their normal employment, are required by federal law to report Clery Act crimes to the University when it has been observed by, or reported to them by another individual. **[A listing of individuals who would typically be defined as a CSA are set forth in Appendix A.](#)**

**Clery Act Crimes:** Specific crimes outlined in the Clery Act that must be reported annually to the CSU community and the US Department of Education. **[A listing of specific categories of Clery Act Crimes are set forth in Appendix B.](#)**

**Clery Act Geography/Reportable Location:** Any building or property owned or controlled by CSU (or any Direct Support Organization or Affiliated Legal Entity) within the same reasonably contiguous geographic

area and used by CSU in direct support of, or in a manner related to, the institution's educational purposes.

**Emergency Notification:** An announcement to inform the campus community about a "significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus."

**Emergency Notification System:** A system by which CSU officials can timely send messages and contact members of the campus community in the event of an Emergency.

**Daily Crime Log:** A record of all alleged criminal incidents that are reported to the University police for the required Clery geographic locations.

**Timely Warning:** A message issued for Clery Act crimes that occur on the CSU's Clery Act geography and which represents a serious or continuing threat that is reported to the police or a CSU CSA.

### III. POLICY STATEMENT

It is the policy of Columbus State University to comply with the Clery Act, to ensure that members of the campus community are safe and have accurate and timely information as mandated therein, and to publish required information to the campus community and to the federal Department of Education by October 1 of each year.

In accordance with the requirements above, CSU shall:

- A. **Timely Warnings** - Via issuance of timely warnings, alert the campus community of Clery Act crimes that pose a serious or continuing threat to students and employees. Timely warnings will be disseminated as soon as pertinent information is available and will provide information that will allow recipients to take precautions to protect themselves and prevent similar crimes from occurring.
- B. **Emergency Notifications** - Via issuance of emergency notifications, alert and inform the campus community about a "significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus."
- C. **Daily Crime Log** - Maintain a daily crime log of all crimes reported. This log will be available for public inspection, upon request.
- D. **Daily Fire Log** - Maintain a daily fire log of all fire-related incidents reported in campus housing. This log will be available for public inspection, upon request.
- E. **Disclosing Types of Clery Act Crimes** - Compile and disclose statistics of reports on the types of Clery Act Crimes reported for CSU's campuses, the immediately adjacent public areas and public areas running through the campuses, remote classroom facilities and certain non-campus facilities.
- F. **Collection of Clery Act Crimes** - Collect reports of Clery Act crimes made to CSU Police, local law enforcement, University officials and other associated with the University who have significant responsibility for student and campus activities once per year. This collection is in addition to reports received on an ongoing basis.
- G. **Publication of ASFSR** - Create and publish an annual report to the Department of Education disclosing statistics of Clery Act Crimes reported over the past three years, as well as University policies and procedures addressing campus security and safety.
- H. **Disclosure of ASFSR** - Annually disclose/provide access to the campus community and the public, the Annual Security and Fire Safety Report, which provides:

- i. Crime data (by type);
  - ii. Fire incident data;
  - iii. Security policies and procedures in place to protect the community; and Information on the handling of threats, emergencies and dangerous situations.
- I. **CSA Identification** - Identification of CSAs will happen on an annual basis, and during the creation of any new positions at CSU. These individuals must be notified annually or upon being hired at CSU of their obligations under the Clery Act to report any and all Clery Crimes that they witness, or are reported to them.
- J. **Mandatory Training** - Provide regular, mandatory training for all CSAs. Trainings must happen annually or during the onboarding process for a newly hired employee whose job description identifies them as a CSA.
- K. **Clery Act Committee** - The Clery Committee, along with the Dean of Students, University Housing, University Police and other appropriate departments will create, establish, and conduct programs at all University campus locations identified as within CSU's Clery geography in the ASFSR to educate the campus and surrounding community about the Clery Act and Clery Act obligations, and to promote general awareness of all crime and safety related issues.
- L. **Missing Student Notification** - Notify the University Police Department at (706) 507-8911 within 24 hours in the event any person (student, faculty or staff) is reported or believed to be missing.
- M. **Tracking Sex Offenders** - Comply with the "Campus Sex Crimes Prevention Act" by tracking convicted, registered sex offenders enrolled at CSU as a student, working or volunteering on campus.<sup>1</sup>
- N. **Records Retention** - Comply with Clery Act guidelines for records retention requiring all supporting records be kept for three years following the publication of the last annual campus security report to which they apply.

#### IV. PROCEDURES

##### Campus Crime Statistics Collection and Recording

CSU encourages every member of the community to report any criminal activity to the University Police Department. The CSU Clery Compliance Committee is responsible for collecting and sorting all reportable statistics for the Annual Security and Fire Safety Report (ASFSR) that occur on campus, adjacent to, or within campus locations.

##### A. Collection

- i. The Clery Coordinator shall ensure that collection of Clery crime statistics from relevant university departments and local law enforcement agencies. These departments include but may not be limited to:
  - 1. Office of the Dean of Students
  - 2. Athletic Department
  - 3. University Police
  - 4. Residence Life

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<sup>1</sup> Information about registered sex offenders in the vicinity of campus may be found on the Georgia Bureau of Investigation's web site, <https://gbi.georgia.gov/services/georgia-sex-offender-registry>.

5. Title IX Office

- ii. All Clery crime statistics must be submitted to the Clery Coordinator no later than five (5) days before they are due to be posted/submitted to the USG. The annual Clery crime statistics will be submitted to the Clery Coordinator at the beginning of the calendar year, and in August before being submitted to the Department of Education and before being entered into the ASFSR.

**B. Count**

- i. The Clery Coordinator shall ensure that Clery crime statistics are counted accurately and comparatively to avoid duplication errors.

**C. Classification**

- i. The Clery Coordinator shall ensure that Clery crime statistics are properly classified to the corresponding Clery Act offense reported to the USG.

**D. Approval**

- i. The Clery Coordinator shall ensure that the annual Clery crime statistics (Including its collection, counting, and classification) are presented to, and approved by, the Clery Committee during the Committee's September meeting.

**Identifying and Training CSAs**

The Clery Coordinator shall work and consult with the Director of Human Resources annually to identify CSAs. Individuals who are not identified as CSAs, but become one during the course of the year shall also be identified. Notice of status change must be given to the CSA and his/her supervisor.

CSAs will receive training in the following areas:

- the role of a CSA;
- description of the Clery Act geography;
- identification of Clery Act crimes and definitions;
- instructions on how to report detailed information to law enforcement; and
- instructions on how to report detailed information to campus authorities.

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Approved by: \_\_\_\_\_  
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Stuart Rayfield, President

Date: 8/29/2023 | 3:59 PM EDT  
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**APPENDIX A**  
**(Campus Security Authorities)**

**CATEGORIES**

Campus Security Authorities will typically fall under one of the following categories:

1. A member of a campus police department.
2. Individuals having responsibility for campus security in some capacity, but are not members of a campus police/security department (e.g., an individual who is responsible for monitoring the entrance to University property).

**Examples include:** Residence Life front desk assistants and Resident Assistants

3. People or offices that are not members of a campus police/security department, but where policy directs individuals to report criminal offenses to them or their office.

**Examples include:** Health Center Employees and Title IX Coordinator

4. Officials having significant responsibility for student and campus activities, including but not limited to, student housing, student discipline and campus judicial proceedings.

**Examples include:** Director of Residence Life, Greek Life Coordinator, Dean of Students, Director of the Center for Global Engagement, faculty or staff involved in study abroad, and faculty or staff involved as an advisor to a student group.

**CURRENT LIST OF CSAs**

CSU's current list of CSAs is maintained by the Clery Compliance Committee, and the Human Resources department, and CSAs are notified annually of their reporting and training obligations.

**APPENDIX B**  
**(Clery Act Crimes)**

**CATEGORIES**

Clery Act Crimes Clery Crimes fall into the following categories:

- **Criminal Offenses:**
  - o Homicide:
    - Murder & Non-Negligent Manslaughter
    - Negligent Manslaughter
  - o Rape
  - o Fondling
  - o Incest
  - o Statutory Rape
  - o Robbery
  - o Aggravated Assault
  - o Burglary
  - o Motor Vehicle Theft
  - o Arson
  
- **Hate Crimes**, which includes any of the above-mentioned offenses and any of the following offenses that are motivated by bias:
  - o Larceny-Theft
  - o Simple Assault
  - o Intimidation
  - o Destruction/Damage/Vandalism of Property
  
- **Violence Against Women Act Reauthorization (VAWA) Offenses**
  - o Domestic Violence
  - o Dating Violence
  - o Stalking
  
- **Arrests and Referrals for Disciplinary Action:**
  - o Carrying and possessing illegal weapons
  - o Liquor law violations
  - o Drug law violations