



---

## **Policy Timeline**

Initial Effective Date: March 2019

Frequency of Review: Annual

Date(s) Revised: July 2020

## **Policy Overview**

The Clery Act (otherwise officially known as the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, section 485 of the Higher Education Act, codified at 20 U.S.C. 1092 (f)) is a federal law requiring colleges and universities across the United States that receive Title IV funding to disclose information about particular crimes on and around their campuses and safety related policies. It is the Clery Act Policy-Campus Safety and Security Reporting policy of the College to comply with its obligations under the Clery Act.

The St. Louis College of Pharmacy is committed to providing a safe and secure learning and working environment for students, faculty and staff consistent with the Clery Act. In accordance with statutory requirements, the College strives to ensure students, faculty, and staff and staff members (the “campus community”) have access to accurate information about crimes committed on and around the campus; access to College wide security policies and related local campus procedures; and a confidential reporting process for victims and witnesses. This policy describes roles and responsibilities for the campus community related to compliance with legal requirements regarding crime reporting, awareness, and prevention.

## **Applies to:** (examples—Faculty, Staff, Students, etc)

This policy applies to all faculty, staff and contractors who are employed by the College.

**Table of Contents: (optional; suggested for policies > 8-10 pages)**

- I. Purpose
- II. Procedures
- III. Campus Security Authorities (CSA)
- IV. Office of Public Safety Responsibilities
- V. Confidential Resources
- VI. Annual Security Report (ASR) and Annual Fire and Security Report (AFSR)
- VII. Timely Warning Notification
- VIII. Immediate Notification

**Definitions: (optional; suggested for terms that have specialized meaning in the policy)**

<b>Term</b>	<b>Definition</b>
Annual Fire Safety Report (AFSR)	Each Campus that maintains an On-Campus student housing facility must publish and distribute annually by October 1 an Annual Fire Safety Report (AFSR). The AFSR includes the fire statistics and the fire safety policies and procedures for each On-Campus student housing facility for the three most recent calendar years. The AFSR may be filed separately or combined with the Annual Security Report (see below).
Annual Security Report (ASR)	The Clery Act requires those postsecondary institutions participating in the Higher Education Act's Title IV student financial assistance programs and each of their separate campuses to annually publish by October 1 a report containing the campus safety policy statements <sup>1</sup> and Clery Crime statistics for the three most recent calendar years. This annual report is known as the Annual Security Report (ASR)
Campus Security Authority (CSA)	Individuals at the College who because of their functional role have an obligation to notify the College department responsible for collecting crime information ( e.g., the campus police department) of alleged Clery Crimes that are reported to or witnessed by the CSA. CSAs include campus police employees and other persons who: 1. Have responsibility for campus security but who are not employees of a campus police department or a campus security department; 2. Are specified in the campus ASR as an individual to whom students and employees should report criminal offenses; or 3. Have significant responsibility for student and campus activities, including, but not limited to, student housing, student discipline and campus judicial proceedings.
Clery Crimes	The Clery Act requires that certain crimes occurring on campus Clery Geography (as defined below) be tracked and reported annually by the Campus each October to the U.S. Department of Education and

	<p>shared with the College Community. The following offenses are Clery Crimes: criminal homicide (murder and non-negligent manslaughter and manslaughter by negligence), sex offenses (rape, fondling, incest and statutory rape), robbery, aggravated assault, arson, burglary, motor vehicle theft, domestic violence, dating violence, stalking, Hate Crimes (as defined below), and arrests or referrals for disciplinary action for drug abuse, liquor and/or weapons law violations. Willful homicide, forcible rape, robbery, or aggravated assaults are collectively referred to as “Part 1 Violent Crimes”.</p>
<p><b>Clery Geography</b></p>	<p>The campus geographic areas, as defined by the Clery Act, for which Clery Crimes are required to be reported. The geographic categories include the following: 1. On-Campus – Any building or property (i) owned or controlled by the College within the same reasonably contiguous geographic area and used by the College in direct support of, or in a manner related to, the College’s educational purposes, including residence halls; (ii) that is within or reasonably contiguous to the campus that is owned by the College but controlled by another person, is frequently used by students, and supports institutional purposes (such as a food or other retail vendor). 2. Public Property – All public properties, including thoroughfares, streets, sidewalks, and parking facilities, that are within the campus, or immediately adjacent to and accessible from the campus. 3. Non-Campus Property a. Buildings or property that are: 1. owned or controlled by the College; and 2. used in direct support of, or in relation to, the College’s educational purposes, and 3. frequently used by students, and 4. not within the same reasonably contiguous geographic area of the College campus; or b. Any building or properties owned or controlled by a student organization that is officially recognized by the College, or Any property outside of the United States if the property otherwise meets the definition of Non-Campus Property described above in subsections a. or b.</p>
<p><b>Emergency Notification</b></p>	<p>A notification issued by a designated campus official promptly informing the College community, upon confirmation, of a significant emergency or dangerous situation occurring on the campus involving an immediate threat to the health or safety of the College community</p>
<p><b>Emergency Response and Evacuation Procedure Test</b></p>	<p>Regularly scheduled drills, exercises, and appropriate follow-through activities, designed for assessment and evaluation of emergency plans and capabilities. The campuses’ procedures to test the emergency response and evacuation procedures are on at least an annual basis and must include an Emergency Notification and an evacuation component for a significant portion of the campus</p>
<p><b>Hate Crime</b></p>	<p>A crime reported to local police agencies or to a CSA that manifests evidence that the victim was intentionally selected because of the perpetrator’s bias against the victim. For the purposes of this section, the categories of bias include the victim’s actual or perceived race, religion, gender, gender identity, sexual orientation, ethnicity, national origin, and disability. For Clery Act purposes, Hate Crimes</p>

	include any of the following offenses that are motivated by bias: murder and non-negligent manslaughter, manslaughter by negligence, sex offenses (rape, fondling, incest and statutory rape), robbery, aggravated assault, burglary, motor vehicle theft, arson, larceny-theft, simple assault, intimidation, or destruction/damage/vandalism of property.
Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act)	Also known as the Clery Act, this federal law requires colleges and universities that receive Title IV funding to disclose information about Clery Crimes occurring on Clery Geography and safety related policies.
Missing Student	A notification issued to an emergency contact, and/or a parent/legal guardian and the local law enforcement agency by a designated STLCOP official when a student who lives in on-campus housing has been missing for 24 hours.
Pastoral Counselors	Individuals associated with and recognized by a religious order or denomination as someone who provides confidential counseling and is functioning within the scope of the recognition. Pastoral Counselors do not have CSA responsibilities.
Professionals Counselors	Individuals whose official responsibilities include providing mental health counseling to members of the College community and who function within the scope of the counselor's license or certification. When acting within the scope of these responsibilities, professional counselors are not CSAs.
Timely Warning	A notification issued by the campus police department to alert the College community about Clery Crimes occurring within the campus' Clery Geography, that are: 1. Reported to, or observed by a CSA; and 2. Considered by the campus to represent a serious or continuing threat to College community.

## Policy Details

### I. Purpose

STLCOP campus must comply with the requirements set forth in the Clery Act in furtherance of providing a safe and secure learning and work environment for STLCOP students, faculty, staff and guests. The public safety director and general counsel will conduct periodic audits to confirm compliance with this policy and any related College procedures.

## Procedures

### II. Procedures

A. Local Implementation Responsibilities: The College must:

1. Have procedures that allow for students and employees to voluntarily and anonymously notify the College of crimes on and around Campus.
2. Designate, notify and train a Clery Coordinator/Officer.
3. Identify, notify and train all Campus Security Authorities (CSAs).
4. Ensure that there are local implementing procedures in place to comply with the Clery Act.

B. Campus Clery Coordinator/Officer: The Clery Coordinator/Officer, or designee, responsibilities must include, but are not limited to, the following:

1. Collaborating with the campus public safety, collecting and reporting crime statistics for Clery Crimes on Clery Geography as defined in the Clery Act.
2. Publishing and distributing annual crime statistics through the ASR.
3. Collaborating with the St. Louis Metro Police and surrounding med campus partners, reviewing the statistics for accuracy prior to submission to the U.S. Department of Education.
4. Coordinating with vice president of operations and general counsel and/or other similar departments, developing and classifying local Clery Geography parameters.
5. Coordinating the distribution of this Policy, and related campus procedures, with appropriate campus offices.
6. Chairing campus Clery Act compliance committee.
7. Serving as liaison with the U.S. Department of Education regarding Clery Act matters.
8. Coordinating with the St. Louis Fire Department to ensure compliance/coordination of the AFSR.
9. Distribute the ASR and AFSR to current employees, enrolled students, prospective employees, and prospective students with a notice that includes a statement of the report's availability, the exact electronic address at which the report is posted, a brief description of the report's contents, and a statement that the campus will provide a paper copy of the report upon request.
10. Identifying all Campus Security Authorities (CSAs) and notifying them of their designation and responsibilities as a CSA.
11. Ensuring that all CSAs are trained upon their initial appointment and provided with ongoing training as appropriate.
12. Submitting the ASR to the Office of the President for informational purposes.
13. Coordinating with appropriate personnel regarding emergency management items related to the Clery Act including a statement of policy regarding disclosure of emergency response and evacuation procedures, conducting and publicizing a Clery Act compliant Emergency Response & Evacuation Procedure Test at least once per year, and the maintaining appropriate documentation for each test.
14. Coordinate as appropriate with other campus offices such as the Office of Human Resources and Student Affairs, to ensure comprehensive response and prevention with respect to Clery crimes.

### **III. Campus Security Authorities (CSA)**

Using the functional duties of a position, rather than the job title, the College must identify and inform students, faculty, other academic staff, staff employees, and volunteers (paid or unpaid, if deemed to be a CSA based on their function) of CSA reporting responsibilities and provide the CSAs with appropriate training. The CSA, other than members of the campus public safety, may not investigate any crime or seek to apprehend any perpetrator. Nothing contained herein is intended to preclude a CSA from conducting appropriate investigations pursuant to other College policies. The CSAs' responsibilities include, but are not limited to, the following:

1. Reporting, immediately or as soon as reasonably practicable (to the campus public safety and/or the Campus Clery Coordinator/Officer) any Clery Act crimes or incidents which they have been made aware, or witnessed, including information regarding:
  - a. When the crime or incident occurred,
  - b. When the crime or incident was reported,
  - c. Where the crime or incident occurred, and
  - d. The nature or description of the crime or incident.
2. The CSA is not a confidential resource. Therefore, the CSA is encouraged to inform victims of crimes of their confidential resources, including the Office of Student Affairs which provides confidential counseling and support for victims of sexual assault, domestic and dating violence and stalking. The Office of Student Affairs also provides information about available campus/community resources and the rights and options regarding reporting the crime to the police.
3. Any CSA who knowingly fails to report a crime may be subject to disciplinary action.

### **IV. Office of Public Safety Responsibilities**

The Office of Public Safety will maintain an online public crime log, recording criminal incidents within two business days in accordance with regulatory requirements.

1. Any reports of a Part 1 Violent Crime, Hate Crime, or sexual assault received by campus police must be immediately, or as soon as practicably possible, disclosed to the St. Louis Metro Police Department.
2. The Office of Public Safety may only disclose the identities of the victim and the alleged perpetrator to the St. Louis Metro Police Department if the victim consents to being identified.
3. The Office of Public Safety will coordinate with the Clery Coordinator/Officer who is responsible for filing the ASR.
4. The Office of Public Safety, Office of Marketing or the VP of Operations are responsible for providing Timely Warnings/Emergency Notifications and Missing Student Notifications in accordance with the Clery Act.

### **V. Confidential Resources**

All confidential offices on campus are exempt from CSA reporting requirements and include but are not limited to the Office of Student Affairs. Disclosures made to Professional

Counselors, licensed psychologists, and Pastoral Counselors, are privileged and confidential and are exempt from the CSA reporting requirements.

**VI. Annual Security Report (ASR) and Annual Fire Safety Report (AFSR)**

By October 1 of each year, campuses will publish and disseminate the ASR and the AFSR that are compliant with the Clery Act. The College will submit the web based crime statistics to the U.S. Department of Education by a date set annually by the Department of Education (typically mid-October). Campuses are required to distribute the ASR and AFSR to current employees, enrolled students, prospective employees, and prospective students with a notice that includes a statement of the reports' availability, the exact electronic address at which the report is posted, a brief description of the reports' contents, and a statement that the campus will provide a paper copy of the report upon request.

**VII. Timely Warning**

The director of public safety or a designee will develop timely warning notices to notify members of the College community about serious crimes against people or property that occur within the core campus boundaries (which includes College owned or controlled property on campus and public property that is within or immediately adjacent to the campus) and in non-campus properties as defined by the Clery Act. Although not required by Federal Law, timely warning notices may also be distributed for crimes that occur in areas outside of the Clery Act geographic areas, if the crime is deemed to pose an ongoing threat to the campus community. The decision to issue a timely warning notice for an off campus crime will be made on a case by case basis depending on an assessment of various factors which include but are not limited to: the nature of the crime, the exact location, the time of the incident, the local police response and guidance to campus officials and the potential direct effect on the campus community. These will be considered Campus Safety Bulletins.

A timely warning notice will be distributed when it is determined that the incident may pose an ongoing or serious threat to members of the Saint Louis College of Pharmacy community. These warnings will be distributed if the incident is reported either to the Office of Public Safety directly or indirectly through a campus security authority, Saint Louis Metropolitan Police Department (SLMPD), Washington University Medical Campus and Barnes Jewish Hospital Security Department.

The Office of Public Safety issues/posts timely warning notices for incidents of

- Murder/Non-Negligent Manslaughter
- Aggravated assault (cases involving assaults among known parties, such as two roommates fighting which results in an aggravated injury, will be evaluated on a case by case basis to determine if the individual is believed to be an on-going threat to the larger STLCOP community)
- Robbery involving force or violence (cases including pick pocketing and purse snatching will typically not result in the issuance of a Crime Alert, but will be assessed on a case by case basis)

- Sexual Assault (considered on a case by case basis depending on the facts of the case, when and where the incident occurred, when it was reported, and the amount information known by public safety)
- Major incidents of arson
- Other crimes as determined necessary by the director of public safety, or his or her designee in his or her absence

A timely warning notice will typically include the following, unless issuing any of this information would risk compromising law enforcement efforts\*:

- Date and time or timeframe of the incident
- A brief description of the incident
- The location of the incident
- Information that will promote safety and potentially aid in the prevention of similar crimes (crime prevention or safety tips).
- Suspect description(s) when deemed appropriate and if there is sufficient detail (see below)
- Police/Public Safety agency contact information
- Other information as deemed appropriate by the director of public safety or his/her designee

\*NOTE: The College will not withhold a basic description of the reported crime under the auspices of the risk of compromising law enforcement efforts. Specific details, such as the exact location, the specific date, etc. could be withheld if releasing that information may compromise law enforcement efforts (such as conducting an investigation, serving a warrant, or conducting an undercover operation, etc.).

The description of subjects in a case will only be included in the alert if there is a sufficient amount of detail to describe the individual. If the only known descriptors are sex and race, that will not be included in the alert.

The director of public safety, or designee, will draft an email containing the proposed Timely Warning and may seek assistance/guidance from members of the Marketing and Communications. The director of public safety, or designee, will then transmit the email containing the Timely Warning to the College community as a blast email. Updates to the STLCOP community about any particular case resulting in a timely warning notice also may be distributed on the College website.

Timely Warnings may also be posted in campus buildings, when deemed necessary. When a Timely Warning is posted in campus buildings, it shall be printed and be posted in the



lobby/entrance area of the affected building(s) for five (5) days. Timely warning notices are filed in the Clery Audit Trail binder with the corresponding incident.

#### **VIII. Immediate Notification**

If a serious crime, a natural disaster or a man-made emergency occurs that poses an immediate threat to the health and safety of the STLCOP community or the a segment of the STLCOP community, federal law requires that the institution immediately notify the campus community or the appropriate segments of the community that may be affected by the situation. If the institution implements the procedures regarding notification of the STLCOP community for an immediate threat, the institution is not obligated to implement the timely warning notice procedures. The types of incidents that may cause an immediate threat to the STLCOP community could include but are not limited to emergencies such as:

1. active shooter on campus
2. hostage/barricade situation
3. bomb threat
4. terrorist threat
5. riot
6. suspicious package with confirmation of a device
7. tornado or severe weather event
8. fire/explosion
9. suspicious death
10. structural damage to a STLCOP owned or controlled facility
11. biological threat (anthrax, etc)
12. significant flooding
13. gas leak
14. hazardous materials spill, etc.

Public safety has a responsibility to respond to such incidents to determine if the situation does in fact, pose an immediate threat to the community. Public safety or a designee of the College will activate the immediate notification system. The content of the message and methods of distributing the message will be determined by a select handful of College administrators, if time permits. This is described below on the various methods of communication the threat to the STLCOP community or to the appropriate segment of the community, if the threat is limited to a particular building or segment of the population.

As per the requirements of the law, public safety will, without delay and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the judgment of the first responders (including, but not limited to the St. Louis Metropolitan Police Department, City of St. Louis Fire and Emergency Medical Service, etc.), compromise the efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

The various systems that institution has in place for communicating information quickly to the STLCOP community, included but not limited to:

1. RAVE Emergency Notification System (text) and (email)
2. ALERTUS- digital signage, beacons and desktop popups
3. VOIP notification
4. Building public address system

The Office of Marketing and Communications will post updates during a critical incident on the STLCOP web site at <https://stlcop.edu/>

Some or all of these methods of communication may be activated in the event of an immediate threat to the STLCOP campus community.

## Responsibilities

<b>Position/Office/Department</b>	<b>Responsibility</b>
Public Safety	Reporting
Public Safety Director	Clery Act compliance
General Counsel	Policy Review and Guidance
Emergency Management Coordinator	Coordination of timely warning and immediate notification with the Office of Marketing and Communication

## Resources (required for any resource referred to in the policy)

N/A

## Policy Contacts

Name	Contact Information
Scott Patterson	314.446.8382

**POLICY APPROVALS**

**POC:**  Approved as to Form  Not Approved  
**POC Chair Signature:**  
**Date:**

**Policy Sponsor:**  Approved  Not Approved  
**Signature:**  
**Date:**

**President:**  Approved  Not Approved  
**Signature:** *John A. Pappas*  
**Date:** *5/20/19*

**Board of Trustees:**  Approved  Not Approved  Not Applicable  
**Chair Signature:**  
**Date:**