

Ongoing Disclosures

LESSON 1: DAILY CRIME LOG

EXEMPT FROM CRIME LOG

Institutions exempt are:

- Without security or police departments
- Local law enforcement personnel who patrol on or near campus without written agreement or contract
- Individual(s) with limited responsibility for campus security
- Security personnel contracted by landlord

CRIME LOG REPORTING REQUIREMENTS

- Contains all reported crimes
- Logged only if reported to police or security
- May include wider geographic area
 - On-campus
 - Noncampus buildings or property
 - Public property
 - Department patrol jurisdiction

DAILY CRIME LOG INCLUDES

- Nature of the crime
- Date/time occurred
- Date/time reported (recorded in order received)
- General location
- Disposition

- Easily
 Understood
- Must Be
 Made Public

THE NATURE OF THE CRIME

- UCR definitions not required
- Hierarchy rule doesn't apply
- State crime categories permissible
 - Use easily understood definitions
 - "Simple assault" or "rape"
 - Don't use state penal codes or citation numbers
- Detailed description desirable

TIME PERIODS

- Date/Time Offense Occurred
- Date/Time Offense Reported
- Recorded in Order Received

GENERAL LOCATION

- Use a meaningful description
- Be specific enough not generic
- Be careful do not disclose personally identifiable information

DISPOSITION OF THE COMPLAINT

Include status (if known)

- Open
- Pending
- Closed
- Disciplinary referral
- Unfounded

Log can only be updated

- Do not delete entries
- Recorded within 2 business days of report
- Update entries for 60 days after reported

WITHHOLDING INFORMATION

Limited information may be temporarily withheld if release would:

- Jeopardize an ongoing investigation
- Jeopardize the safety of an individual
- Cause a suspect to flee or evade detection
- Result in the destruction of evidence

MAKING THE LOG AVAILABLE

- Hard or electronic copy
- On-site at each campus
- Truly available to the public/media
- Most recent 60 days
- During normal business days/hours
- Portion of log older than 60 days available within two (2) business days of a request

Archived for at least 7 years

SAMPLE DAILY CRIME LOG: CALENDAR YEAR 2015

WB 27

Nature (Classification)	Date/Time Reported	Date/Time Occurred	General Location	Disposition
Larceny	01/20/15 505hrs	01/10/15 0800hrs	Admin. Building	Closed 02/24/15
Vandalism	01/27/15 1231hrs	01/17- 01/22/15	Jacobs Hall	Closed 02/24/15
Vandalism	04/12/15 1937hrs	04/12/15 1930hrs	Lester Hall	Open
Liquor Law Violation	04/23/15 0300hrs	04/23/15 0300hrs	South Parking Lot	Judicial Referral

Ongoing Disclosures

LESSON 2: FIRE LOG

FIRE LOG LESSON OVERVIEW

- Daily reporting requirement
- Applicable only to institutions with on-campus housing facilities
- Reported to any official at the institution

REPORTABLE FIRES

- Already extinguished
- Discovered while burning
- Fires necessitating a 911 call
- Minor fires, easily extinguishable

FIRE LOG REQUIREMENTS

- Date fire reported
- Nature of the fire
- Date and time of fire
- General location of fire

MAINTAINING THE FIRE LOG

Entries must be added to fire log:

- Within 2 business days
- Most recent 60 days available for public inspection
- Entries older than 60 days going back 7 years must be made available within 2 business days
- Public access includes media

MAINTAINING THE FIRE LOG

Institutions may decide:

- Who/which department maintains
- Where log is kept
- If electronic or hard copy
- Must be accessible on-site(s)

COMBINING FIRE & DAILY CRIME LOGS

If combined:

- Label to clearly indicate that it is a fire and crime log
- Contains required element of both fire and crime log

COMBINING FIRE & DAILY CRIME LOGS

If separate:

- Fire log records all reported fires, including arson, in on-campus student housing facilities
- The daily crime log records:
 - All arsons and attempted arsons reported to campus police/security that occur in on-campus, on-campus student housing, noncampus, or public property or within the patrol jurisdiction

MESSAGING TO YOUR CAMPUS



Take a minute on your own to note on your *Reminders: Daily Crime and Fire Log* page a few key messages that you would like to share with your campus community.

Ongoing Disclosures

LESSON 3: TIMELY WARNINGS & EMERGENCY NOTIFICATION POLICY STATEMENTS

"CHRIS"

- Chris attended a fraternity party last night and woke up today in the bed of their friend, Sam, who lives in Merriweather Hall.
 Chris lives in Post Hall.
- Chris returns to Post Hall and checks in with the RA.
- Chris tells the RA, "I think Sam raped me."
- Chris was drinking at the party, but is unsure of how much;
 Chris does remember returning to Sam's room before blacking out and shares all of this with the RA.
- Chris is scared and wants to figure out what really happened but doesn't want to make Sam mad or upset.
- The next day, two other students that attended the same party as Chris report similar experiences of drinking a lot, apparently blacking out and being sexually assaulted.
- Additionally, members of the fraternity that held the party report being uncomfortable with an act of hazing they were told to participate in that involved supplying alcohol to friends that attended and to "hook up" with them. These fraternity members did not participate but knew of other pledges who had.

- Would/should this case result in a timely warning or emergency notification?
- Which campus policy or policies would apply? (Timely warning? Emergency notification? Both? Neither? Any additional policies?)

EMERGENCY NOTIFICATIONS

- Broader focus any significant emergency or dangerous situation
- Anywhere on campus
- Entire campus or segment(s)
- Issue alert immediately upon confirmation

TIMELY WARNINGS

- Narrower focus Clery Act crimes
- Clery Act geographic area
- Reach entire campus community
- Issue warning as soon as pertinent info is available

TIMELY WARNING POLICY & WARNINGS

Timely Warning Policy



Timely Warnings

TIMELY WARNING POLICY COMPONENTS

- A timely warning policy should address the following components:
 - Circumstances that trigger a warning
 - Who issues
 - Dissemination process/channel

CSAs AND TIMELY WARNINGS

CSA Role

- Information-sharing
- Knowledge link

Advocates as CSAs

- Boundaries
- Limitations
- Communication

CIRCUMSTANCES THAT TRIGGER WARNINGS

- Clery Act crimes (included in annual statistics)
- Reported to CSA or local law enforcement
- Occurred in the specified geographic areas
 - On-campus
 - Public property
 - Noncampus
- Represents a serious or continuing threat
 - Students
 - Employees

CLERY ACT CRIMES

- Criminal Homicide
 - Murder & Non-negligent Manslaughter
 - Manslaughter by negligence
- Sex Offenses
 - Rape
 - Fondling
 - Incest
 - Statutory Rape
- Aggravated Assault
- Robbery
- Burglary
- Motor Vehicle Theft
- Arson

VAWA OFFENSES, HATE CRIMES, AND ARRESTS & REFERRALS FOR DISCIPLINARY ACTION

- Dating Violence, Domestic Violence, and Stalking
- Hate Crimes
 - Crimes Within the Criminal Offenses Category
 - Plus Larceny-theft, Simple Assault, Intimidation, and Destruction, Damage, or Vandalism of Property
 - Bias Categories: Race, Gender, Gender Identity, Religion, Sexual Orientation, Ethnicity, National Origin, Disability
- Arrests or Disciplinary Referrals
 - Liquor Law Violations
 - Drug Law Violations
 - Weapons Law Violations

GEOGRAPHIC AREAS

- On-Campus Property
 - Including on-campus student housing
- Public Property
 - Including streets and sidewalks
- Noncampus Property
 - Including remote classroom space and property owned or controlled by student organizations officially recognized by the institution

DECISION TO ISSUE A WARNING

- Specify Who Is Responsible
 - Individual (Title)
 - Department/Office
 - Consultation Process
- Open Communication
- Case-By-Case Basis

TIMELY WARNING DISSEMINATION PROCESS

- Must be quick (timely)
 - As soon as pertinent information is available
- Community-wide
 - Likely to reach the entire campus community
- Aid in the prevention of similar crimes
- Specify methods
 - SMS text messaging
 - E-mail, social media
 - Posters
 - Other methods and/or combination of methods

TIMELY WARNINGS INCLUDE

- Information that promotes safety
- Allows individuals to protect themselves
- Time, location, and type of crime

TIMELY WARNINGS: CONFIDENTIALITY

- Withhold as confidential the names and other identifying information of victims
 - Required in the institution's dating violence, domestic violence, sexual assault, and stalking policy

EXEMPT CASES

- Crimes Reported to:
 - Pastoral or professional counselor
- Privileged Information Protected by State Law:
 - Medical doctor
 - Attorney/client

EMERGENCY NOTIFICATION POLICY AND NOTIFICATIONS

Emergency Notification Policy



EmergencyNotifications

EMERGENCY NOTIFICATION POLICY REQUIREMENTS

Policy Must:

Articulate the process used to confirm that there is a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on campus

IMMEDIATE THREATS

All Hazards:

- Terrorist attack
- Active shooter
- Natural disaster
- Environmental
- Weather
- Other

EMERGENCY NOTIFICATION POLICY REQUIREMENTS

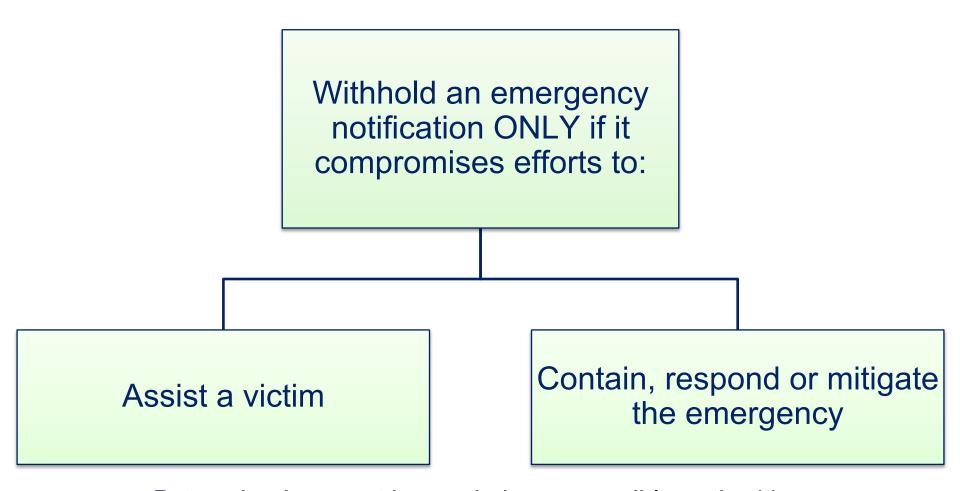
Policy Must:

- Disclose the process used to determine which segment(s) receive notification
- Explain how the content of the notification will be developed
- Disclose which officials by title are responsible for each step
- Initiate notification without delay and taking into account the safety of the community

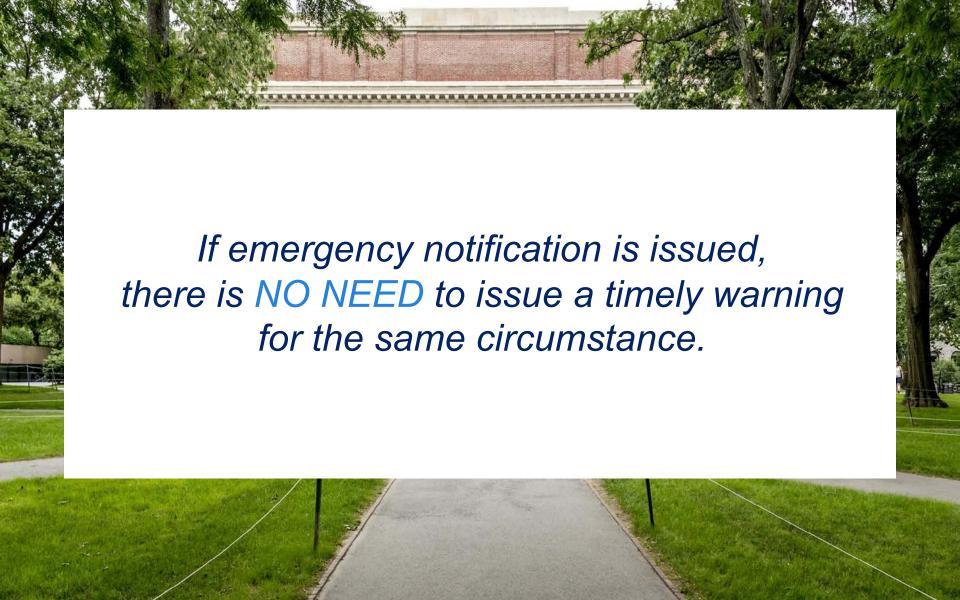
EMERGENCY NOTIFICATION POLICY REQUIREMENTS

Following confirmation the institution must:

- Determine what information to release
- Initiate notification
- Take into account safety of the campus community
- Provide adequate follow-up information



Determination must be made by responsible authorities identified in the policy statement



Draft an emergency notification for the following situation:

The institution receives confirmation of a fire occurring at the Clark Science Center on the north end of campus.

The notification may be no longer than 280 characters.

EMERGENCY NOTIFICATIONS

- Broader focus any significant emergency or dangerous situation
- Anywhere on campus
- Entire campus or segment(s)
- Issue alert immediately upon confirmation

TIMELY WARNINGS

- Narrower focus Clery Act crimes
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- Reach entire campus community
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CASE STUDY ACTIVITY

Ongoing Disclosures

CASE STUDIES (1)

- Review the following case studies:
 - "Norovirus Infection"
 - "Fondling"
 - "The Arsonist"
- For each case study, answer the following questions:
 - Is an emergency notification or timely warning warranted?
 - If so, how quickly should an emergency notification or timely warning be issued?
 - How widely should the emergency notification or timely warning be issued?

- On Tuesday, two RAs in South Hall reported to their hall director that several first year students living on the 3rd and 5th floors were experiencing severe diarrhea and vomiting.
- By Wednesday night students on the 2nd floor reported similar symptoms, bringing the total number of students affected to 5.
- On Friday morning the campus health clinic receives test results confirming that all 5 students have a norovirus infection. The residents share this information with their hall director.

"NOROVIRUS INFECTION" CASE STUDY ANALYSIS

- Is an emergency notification or timely warning warranted? Why or why not?
- If so, how quickly should an emergency notification or timely warning be issued?
- How widely should the emergency notification or timely warning be issued?

- On Thursday night Jane Smith reports to her RA that she was waiting for the campus shuttle when a white male in his 20's with shaggy brown hair grabbed her breasts before running off.
- That evening the RA reports the incident to her hall director who subsequently reports the incident to campus police on Friday morning.
- On Friday afternoon Rebecca Brown, a graduate teaching assistant, calls campus police to report that a white male put his hand down her pants. She noted that he was wearing sunglasses and had a hooded sweatshirt that covered his hair. She was waiting for the campus shuttle when it occurred.

"FONDLING" CASE STUDY ANALYSIS

- Is an emergency notification or timely warning warranted? Why or why not?
- If so, how quickly should an emergency notification or timely warning be issued?
- How widely should the emergency notification or timely warning be issued?

- On Friday night and into Saturday morning a series of three fires are set in the basement and two storage areas on occupied floors of the East Campus Residence Hall.
- Campus security responds to each fire and puts them out within several minutes.
- On Saturday morning investigators with the state Fire Marshal's office confirm that the fires were arsons.

"THE ARSONIST" CASE STUDY ANALYSIS

- Is an emergency notification or timely warning warranted? Why or why not?
- If so, how quickly should an emergency notification or timely warning be issued?
- How widely should the emergency notification or timely warning be issued?

- Need for process to evaluate reports and document decisions
- Tool: Timely Warning Decision Matrix

CASE STUDIES (2)

- Review the following case studies:
 - "Chris"
 - "Anonymous Threat"
 - "Domestic Violence"
- For each case study, answer the following questions:
 - Would you issue a timely warning or emergency notification?
 Why or why not?
 - If you would issue an alert, identify when the alert would be issued and who would receive the alert.
 - If you would not issue an alert, draft your rationale for why you would not send the alert.

"CHRIS"

WB 37

- Chris attended a fraternity party last night and woke up today in the bed of their friend,
 Sam, who lives in Merriweather Hall. Chris lives in Post Hall.
- Chris returns to Post Hall and checks in with the RA.
- Chris tells the RA, "I think Sam raped me."
- Chris was drinking at the party, but is unsure of how much; Chris does remember returning to Sam's room before blacking out and shares all of this with the RA.
- Chris is scared and wants to figure out what really happened but doesn't want to make Sam mad or upset.
- The next day, two other students that attended the same party as Chris report similar experiences of drinking a lot, apparently blacking out and being sexually assaulted.
- Additionally, members of the fraternity that held the party report being uncomfortable with an act of hazing they were told to participate in that involved supplying alcohol to friends that attended and to "hook up" with them. These fraternity members did not participate but knew of other pledges who had.

"CHRIS" CASE STUDY ANALYSIS

- Would you issue a timely warning or emergency notification? Why or why not?
- If you would issue an alert, identify when the alert would be issued and who would receive the alert.
- If you would not issue an alert, draft your rationale for why you would not send the alert.

- A student calls public safety to report a threat posted on an anonymous social media app.
- The threat contains specific details on where, when, and how a shooting will take place in the university commons.

"ANONYMOUS THREAT" CASE STUDY ANALYSIS

- Would you issue a timely warning or emergency notification? Why or why not?
- If you would issue an alert, identify when the alert would be issued and who would receive the alert.
- If you would not issue an alert, draft your rationale for why you would not send the alert.

WB 39

"DOMESTIC VIOLENCE"

- An administrator in student life reports to a human resources administrator (who the campus identifies as a CSA) that her spouse hit her repeatedly in the stomach in the parking garage on-campus after accusing her of having an affair with another campus administrator.
- She discloses that this is not the first time he has hit her or expressed jealousy but it is the first time it has occurred on campus.
- When she exited the garage, he threatened, "Someone will pay for this."

"DOMESTIC VIOLENCE" CASE STUDY ANALYSIS

- Would you issue a timely warning or emergency notification? Why or why not?
- If you would issue an alert, identify when the alert would be issued and who would receive the alert.
- If you would not issue an alert, draft your rationale for why you would not send the alert.

MESSAGING TO YOUR CAMPUS



Take a minute on your own, to note on your Reminders: Ongoing Disclosures page a few key messages about ongoing disclosures that you would like to share with your campus community.

ASR CHECKLIST



Turn to the **ASR Checklist** in the Workbook's Appendix

- We will review policy statements for
 - Timely warnings
 - Emergency notification
- Some reminders:

TIMELY WARNING POLICY COMPONENTS

- Circumstance regarding issuance
- Individual or office responsible
- Dissemination manner

EMERGENCY NOTIFICATION AND EVACUATION POLICY COMPONENTS

- Procedures institution will use to immediately notify the campus community upon confirmation
- Process used to confirm significant emergency or dangerous situation involving immediate threat to health and safety
- Process to determine which segment(s) will receive notification
- Explanation of how the content of a notification will be developed
- Explanation of process to initiate notification system
- List of title or office of those responsible

EMERGENCY NOTIFICATION AND EVACUATION POLICY COMPONENTS (CONT'D)

- Statement that notification will be made without delay and taking into account the safety of the community unless notification will compromise efforts to assist a victim or contain, respond to, or otherwise mitigate emergency
- Procedures for disseminating emergency information to the larger community
- Procedures to annually schedule drills, exercises, and appropriate follow-through activities
- Procedures to annually publicize emergency response and evacuation in conjunction with a test and documentation of each test

ASR CHECKLIST



Turn to the ASR Checklist in the Workbook's Appendix

- Look at your annual security report and begin to review your policy statements for the following section:
 - Timely warnings
 - Emergency notification
- Note whether the required elements are reflected in the ASR and draft next steps, responsible parties, and timelines.



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