

SCHOOLCRAFT COLLEGE
18600 Haggerty Road, Livonia, Michigan 48152-2696

CLERY ACT COMPLIANCE PROCEDURE

The "Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act of 1998," commonly referred to as the "Clery Act," requires institutions of higher education receiving federal financial aid to report specified crime statistics on college campuses and areas within the same reasonably contiguous geographic area of college campuses, and to provide other safety and crime information to members of the campus community.

The Clery Act requires Schoolcraft College to comply with regulations as follows. Failure to comply can result in financial penalties for each violation of the Clery Act. The Chief Operations Officer will be the Clery Act compliance officer.

In accordance with the requirements of the Clery Act, the College shall:

- Via issuance of timely warnings, alert the campus community of Clery Crimes that pose a serious or continuing threat to the campus and surrounding community. Timely warnings will be disseminated throughout the community as soon as pertinent information is available and will provide information that will allow the community to take precautions to protect themselves and prevent similar crimes from occurring.
- 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."
- Maintain a daily crime log of all crimes reported. This log will be available for public inspection, upon request.
- Compile and disclose statistics of reports on the types of Clery Crimes reported for the College's campuses, the immediately adjacent public areas and public areas running through the campuses, remote classroom facilities and certain non-campus facilities.
- Collect reports of Clery Crimes made to Campus Police, local law enforcement, College officials and others associated with the College who have significant responsibility for student and campus activities.
- Create and publish an annual report to the Department of Education disclosing statistics of Clery Crimes reported over the past three years, as well as College policies and procedures addressing campus security and safety.
- Annually disclose/provide access to the campus community and the public, the Annual Security Report, which provides:
 - Crime data (by type);

- Security policies and procedures in place to protect the community; and
- Information on the handling of threats, emergencies and dangerous situations.
- Identify CSAs (Campus Security Authorities) on a regular, ongoing basis, and notify these individuals of their obligations under the Clery Act to report any and all Clery crimes that they witness, or are reported to them.
- Provide annual, mandatory training for all CSAs.
- Work with the College Police and other appropriate departments to create, establish and conduct programs at all College campus locations 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 at all College locations.

Clery Compliance Officer

The Clery Compliance Officer at Schoolcraft College is the Chief Operations Officer.

Clery Act Crimes (Clery Crimes)

Crimes required by the Clery Act to be reported annually to the campus community include: criminal homicide (murder and negligent/non-negligent manslaughter); sex offenses (rape, fondling, statutory rape, and incest); robbery; aggravated assault; burglary; motor vehicle theft; arson; hate crimes (including larceny-theft, simple assault, intimidation, or destruction/damage/vandalism of property that are motivated by bias); dating violence; domestic violence; stalking; and arrests and referrals for disciplinary action for any of the following: (a) liquor law violations, (b) drug law violations, and (c) carrying and possessing illegal weapons.

Crime Reporting Geography and Availability

Clery Act crime reporting is not limited to events that occur on campus or within campus buildings. The College must include statistics for crimes that occur in any of these geographic areas:

- On-campus: The on-campus geography category reports crimes in these categories at the Livonia campus, Radcliff Center, Public Safety Training Complex, Manufacturing and Engineering Center (MEC) and public property (immediately adjacent sidewalks and streets at these campuses).
- Public property immediately adjacent to the campus.
- Non-campus buildings and property owned or controlled by the organization that are used for educational purposes and frequently used by students but not a part of the core campus.

Daily Crime Log

Wherever crimes occur, Campus Police must maintain a daily crime log of all reported crimes that fall within our jurisdiction. This crime log must be made available to the public during daily business hours.

The Campus Police will maintain a daily crime log that may be accessed during normal business hours. Any crime that occurs on campus and is reported to Campus Police or a CSA will be recorded in the public crime log within two business days of being reported. The nature of the crime, date, time, and general location and disposition (if known) will be included in the log.

Campus Security Authorities (CSAs)

Under Clery, a crime is "reported" when it is brought to the attention of a campus security authority or local law enforcement personnel by a victim, witness, other third party or even the offender. It doesn't matter whether or not the individuals involved in the crime, or reporting the crime, are associated with the institution.

Individuals at the College who, because of their function for the College, have an obligation under the Clery Act to notify the College of alleged Clery Crimes that are reported to them in good faith, or alleged Clery Crimes that they may personally witness. These individuals, by virtue of their position due to official job duties, ad hoc responsibilities, or volunteer engagements, are required by federal law to report crime when it has been observed by, or reported to them by another individual. These individuals typically fall under one of the following categories at Schoolcraft College:

- A member of the Campus Police department.
- Individuals having responsibility for campus security in some capacity, but are not members of a campus police (e.g., an individual who is responsible for monitoring the entrance to College property).
- People or offices that are not members of the Campus Police department, but where policy directs individuals to report criminal offenses to them or their office.
- Officials having significant responsibility for student and campus activities, including but not limited to, student housing, student discipline and campus judicial proceedings.

Common examples of CSAs include (but are not limited to):

- Police and security personnel
- An administrator of students
- Athletic Directors
- Athletic Coaches
- Faculty advisors to student organizations
- Resident Assistants/Advisors
- Coordinators of Greek Affairs
- Title IX Coordinators

The CSAs' responsibilities include, but are not limited to, the following:

1. Reporting immediately or as soon as reasonably practicable (to the Campus Police department) 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 campus CARE office, which provides confidential counseling and support for victims of sexual assault, domestic and dating violence and stalking. The CARE office also provides information about available campus/community resources and the rights and options regarding reporting the crime to the police.
 3. A CSA shall immediately, or as soon as practicably possible, notify Campus Police of any report received by the CSA of a Part 1 violent crime, hate crime, or sexual assault, irrespective of where the crime occurred.
 4. Any CSA who knowingly fails to report a crime may be subject to disciplinary action.

TIMELY WARNINGS AND EMERGENCY NOTIFICATIONS

The Campus Police department is responsible for providing Timely Warnings/Emergency Notifications in accordance with the Clery Act.

Timely Warnings

The Clery Act requires the College to alert the campus community to certain crimes in a manner that is timely and will aid in the prevention of similar crimes. Although the Clery Act doesn't define "timely," the intent of a warning regarding a criminal incident(s) is to enable people to protect themselves. This means that a warning should be issued as soon as pertinent information is available. This is critical, even if you don't have all of the facts surrounding a criminal incident that represents a serious and continuing threat to your students and employees, you must issue a warning. The warning should contain information about the type of criminal incident that has occurred, although you can provide additional information as it becomes available.

Schoolcraft College will distribute "timely warnings" to the College community about serious Clery Act crimes that are considered to be a serious or ongoing threat to members of the College community as directed by the President. This information may be disseminated in various forms, i.e., College email, text message, mobile phone, posting on the College website and/or social media posts.

Emergency Notifications

In the event of an immediate, significant danger to the health or safety of the campus community (e.g. weather, disease outbreak, explosion), campus officials may issue an emergency notification. This notification can include the entire campus, or be limited to a specific area deemed to be at risk.

In case of a serious threat to the Schoolcraft College community, as determined by the Campus Police, an “emergency notification” will be prepared and distributed to the College community, as directed by the President. This information may be disseminated in various forms, i.e.: College email, text message, mobile phone, posting on the College website and/or social media posts.

What Warrants a “Timely Warning” or “Emergency Notification?”

Timely warnings will be issued for a specific College location or College-wide whenever a crime is reported to the Campus Police or a local police agency that is considered to represent a serious or continuing threat to students and employees.

Whenever a timely warning is sent, it will be sent to the entire affected community. A “timely warning” will include a clear description of the incident and any preventative measures that should be considered.

Emergency notifications will be issued when the College is made aware of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students and/or employees and occurs on a specific campus location. As appropriate, emergency notifications may be targeted at only a segment or segments of the campus community that is at risk. Emergency notifications will be issued without delay unless doing so would compromise efforts to assist a victim or to contain, respond to, or otherwise alleviate the emergency.

The President, or in his/her absence, the Chief Operations Officer and/or Chief Student Services Officer, in conjunction with the Chief of Campus Police and/or other campus and non-campus officials, as appropriate, will confirm the existence of a situation that may warrant a timely warning or emergency notification and determine if they are warranted and the extent of the notification as appropriate. In addition to criminal incidents, emergency notifications may be issued in situations such as, but not limited to:

1. Safety Related Issues

- An incident that occurs in close proximity to any of the College campuses that may potentially affect the personal safety and security of the student and employee population.
- An incident that occurs on any Schoolcraft College campus that affects the personal safety and security of the community.

2. Health Related Issues

- A member of our population is diagnosed with a serious or life threatening communicable/infectious disease.
- Evidence of bio terrorism.

Any emergency where the health and/or safety at Schoolcraft College are in question may constitute an emergency. Below is a list of emergency situations identifying the most common types of emergency notifications; the list is not inclusive.

- Bomb threat – based on credible intelligence that indicates a threat.
- Civil disturbance – disruption of normal College activities by a group of people.
- Fire – large-scale fire to building(s), wildfires, local community or industry that may endanger students, employees or property.
- Hazardous material – dangerous material that is chemical, biological, or nuclear spreading from a contained area.
- Major road closing/incident – unanticipated event that would disrupt safe passage to and from the College.
- Medical emergency – pandemic or an event with mass casualties.
- Natural disasters – such as earthquakes.
- Personal safety – situations that include use of weapons, violence, perpetrator(s) at large, active shooter, and hostage situation or missing persons. Any situation, on or off campus that, in the judgment of the local authorities and the College President or designee, constitutes an on-going or continuing threat to persons or property.
- Suspicious package – reasonable belief that a package may contain chemical, biological, or nuclear substance(s) that would cause harm to persons or property.
- Utility failure – a major disruption or damage to utilities including gas, electrical, or water.
- Weather – severe weather conditions to include flooding, snow/ice/cold, thunderstorm, wind, tornado, etc.

In making timely warnings and emergency notifications, these are the methods we may use:

- Alerts to students and employees.
- Postings in College facilities and on campus as applicable to the incident.
- Posting of notification on the College website.
- Posting on social media sites, i.e. Facebook and Twitter.

Schoolcraft College Community Responsibility

Students and employees should register for alerts at www.getrave.com to receive alerts of timely warnings and/or emergency notifications via cell phone or email.

Victim Rights, Options, and Resources

Victims of sexual assault, domestic violence, dating violence, and stalking have specific rights, options, and resources guaranteed to them by the Clery Act.

- Prevention Education
 - Schoolcraft College is required to provide to students and employees, on an introductory and ongoing basis, prevention and awareness programs on the crimes covered above. These programs must include material on bystander intervention and risk reduction aimed at recognizing the warning signs of these crimes.
- Student and Employee Rights
 - Schoolcraft College must provide victims of the crimes covered above with a written explanation of their rights. These rights include the option for a relocation/change of housing, transportation, or academic course assignment. They also include access to counseling services and law enforcement notification.
- Disciplinary Proceedings
 - All disciplinary proceedings must be conducted by trained parties at the College — either individuals or panels of trained persons. Proceedings are required to be prompt, fair, and impartial, and must confer certain procedural rights to both the accuser and the accused.

Annual Security Report (ASR)

By October 1 of each year, Schoolcraft College will publish and disseminate an ASR that is compliant with the Clery Act. Schoolcraft College does not have student housing, therefore the AFSR (Annual Security and Fire Safety Report) does not apply to the College. If in the future the College establishes student housing, the Clery AFSR requirement will apply. The College will submit crime statistics to the U.S. Department of Education website by the date set annually by the Department of Education (typically mid-October).

The College is required to distribute the ASR 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.

The ASR and supporting documents will be retained for as long as designated in the Record Retention Schedule below.

Record Retention

The daily crime log, incident reports, and all documents supporting the Annual Security Report will be retained for a minimum of seven years.

Retaliation

This Policy and 34 CFR 668.46(m) prohibits retaliation against a person who makes a Clery Act report. Retaliation includes, but is not limited to, threats, intimidation, coercion, reprisals, and/or harmful (adverse) actions related to employment or education.

Any member of Schoolcraft College who participates in retaliation may be subject to disciplinary action, including dismissal, according to the College disciplinary procedures.

Noncompliance with the Policy

Noncompliance with this Policy is handled in accordance with faculty, staff, and student policies pertaining to disciplinary matters.

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