I. Policy Statement

The University of Tulsa (TU or University) is committed to providing students, employees, and visitors with a reasonably safe and secure environment. The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (“Clery Act”) is a federal law that requires the University to disclose to the campus community information about certain crimes that occur on and near the campus, and other information about campus safety and security policies and procedures. Compliance with the Clery Act is one way the University demonstrates its commitment to campus safety and security.

This Campus Security Authority (CSA) Policy (“Policy”) establishes University requirements and expectations regarding crime reporting pursuant to the Clery Act as well as the development, documentation, and enforcement of certain campus safety and security policies, procedures, and practices required by the Clery Act. Any person seeking Clery Act guidance or requesting information about whether they are a Campus Security Authority may e-mail [clery@utulsa.edu].

II. Application

This Policy applies to any individual designated by the University as a Campus Security Authority.

III. Definitions

Campus Security Authority (CSA) is an affiliate of the University who, by virtue of their official job duties, ad hoc responsibilities, or volunteer engagements at the University, falls under one or more of the following categories:

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

The University designates CSAs using the criteria established in the Clery Act.
An institution must report to the Department of Education and disclose in its Annual Fire Safety and Security Report statistics regarding Clery Crimes that occur on Clery Geography and that are reported to local police agencies or a CSA. Thus, CSAs are required to report to TU all Clery Crimes they have observed or that have been reported to them by another individual.

**Clery Crimes** are defined pursuant to the Clery Act and its implementing regulations as:

1. **Arson:** Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property of another, etc.

2. **Murder and Non-negligent Manslaughter:** The willful (non-negligent) killing of one human being by another.

3. **Manslaughter by Negligence:** The killing of another person through gross negligence.

4. **Robbery:** The taking or attempting to take anything of value from the care, custody, or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.

5. **Aggravated Assault:** An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm.

6. **Burglary:** The unlawful entry of a structure to commit a felony or a theft.

7. **Motor Vehicle Theft:** Theft or attempted theft of a motor vehicle.

8. **Sexual Assault Offenses:** Any sexual act directed against another person, without consent of the victim, including instances where the victim is incapable of giving consent. The Clery Act requires reporting for the following Sexual Assault Offenses:

   a. **Rape** is the penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim. This offense includes the rape of a person of any gender by any gender.

   b. **Fondling** is the touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of their age or because of their temporary or permanent mental incapacity.

   c. **Incest** is sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

   d. **Statutory Rape** is sexual intercourse with a person who is under the statutory age of consent.
9. **Dating Violence**: Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based on the reporting party’s statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. Dating Violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. Dating violence does not include acts covered under the definition of domestic violence.

10. **Domestic Violence**: A felony or misdemeanor crime of violence committed by a current or former spouse or intimate partner of the victim; by a person with whom the victim shares a child in common; by a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner; by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; by any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

11. **Stalking**: Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for the person’s safety or the safety of others; or suffer substantial emotional distress.

12. **Weapon Law Violation**: The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices or other deadly weapons. This classification encompasses weapons offenses that are regulatory in nature.

13. **Drug Law Violation**: The violation of laws prohibiting the production, distribution and/or use of certain controlled substances and the equipment or devices utilized in their preparation and/or use. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation or importation of any controlled drug or narcotic substance. Arrests for violations of state and local laws, specifically those relating to the unlawful possession, sale, use, growing, manufacturing and making of narcotic drugs.

14. **Liquor Law Violation**: The violation of state or local laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession or use of alcoholic beverages, not including driving under the influence and drunkenness.

15. **Hate Crimes**: A criminal offense that manifests evidence that the victim was intentionally selected because of the perpetrator’s bias against the victim. For Clery Act purposes, Hate Crimes include any of the following offenses that are motivated by bias: Murder and Non-negligent Manslaughter; Sex Offenses; Robbery; Aggravated Assault; Burglary; Motor Vehicle Theft; Arson; Larceny-Theft; Simple Assault; Intimidation; and Destruction/Damage/Vandalism of Property. The Clery Act requires Hate Crime reporting for the following biases: Race; Religion; Sexual Orientation; Gender; Gender Identity; Ethnicity; National Origin; and Disability.

**Clery Geography** is defined as:
1. Buildings and property that are part of the institution's campus. TU has three separate campuses that make up the institution’s campus, including:
   i. **Main Campus**, 800 S. Tucker Dr., Tulsa, OK 74104. **Main Campus** consists of roughly 1 square mile bounded by East Third Street on the North, East Eleventh Street on the South, South Harvard Avenue on the West, and South Columbia Avenue on the East. On-campus sites on Main Campus also include the following:
      1. Fourth and Harvard Parking Lot, 3307 E 4th St. Tulsa, OK 74104
      2. Henneke Building, 1204 S. Harvard Ave., Tulsa, OK
      3. True Blue Neighbors Behavioral Health Clinic, 2405 E. 4th Pl. Tulsa, OK
      4. TU Bookstore, 3314 E. 11th St., Tulsa, OK
      5. TU Automotive, 1207 S. Harvard Ave., Tulsa, OK
      6. West Park Apartment Building, 2504 E. 4th Pl., Tulsa, OK
   ii. **North Campus**, 2450 E. Marshall St., Tulsa, OK
   iii. **Oxley College of Health Sciences**, 1215 S. Boulder Ave., Tulsa, OK

2. The institution's noncampus buildings and property, which include:
   i. **Gilcrease Museum**, 1400 N. Gilcrease Museum Road, Tulsa, OK
   ii. **Hardesty Press Storage Building**, 1911 E. 11th St., Tulsa, OK
   iii. **Skelly House**, 2101 S. Madison Ave., Tulsa, OK
   iv. **Zarrow Center**, 124 E. Brady St., Tulsa, OK
   v. any other building or property owned or controlled by the institution that is used in direct support of, or in relation to, the institution’s educational purposes, is frequently used by students, and is not within the same reasonably contiguous geographic area of the institution; and

3. Public property within or immediately adjacent to and accessible from the campus.

**Crime Report** is a required report made by a CSA of an alleged Clery Crime committed within the University's Clery Geography. A Crime Report includes the following required information:

- CSA First/Last Name
- CSA Email/Phone
- Nature of Incident
- Location of Incident:
- Date Incident Reported to You (CSA)
- Date of Incident
- Time of Incident

A Crime Report may also include the following information:

- Who reported this to you?
- Have they requested confidentiality?
- Does this person want to file a complaint or request an investigation?
- Was this Incident Reported to Law Enforcement or Campus Security?
For Clery Act purposes, TU affiliation of the involved parties is not a relevant fact as to whether or not a report is to be completed. If a Clery Crime occurs, documentation is required. A report may be made by a victim, a witness, or any third party, even if they did not witness the reported Clery Crime. Once a CSA is involved, there is an obligation that the Clery Crime be reported to the Department of Education and included in the University’s Annual Fire Safety and Security Report. In addition, any crime reported to the TU Department of Security that has occurred within TU’s Clery Geography and patrol jurisdiction must be entered on the University’s Daily Crime and Fire Log within two business days of the time the report was made to the Department.

**Timely Warning** is defined as an emergency notification to the campus community related to criminal activity. Timely warnings must be issued for all Clery Crimes reported to a CSA or local police that represent a serious threat to students and employees. Timely warnings also may be issued for other crimes as deemed necessary. Upon receipt of all relevant information, such warnings will, as circumstances warrant, be issued by Campus Security in a manner to best protect the campus community.

IV. Policy and Procedures

A. **Identify, Notify, and Train CSAs**

The University identifies positions that meet the definition of a CSA. Once identified, the Clery Compliance Coordinator notifies individuals in these positions of their obligations under the Clery Act to report all Clery Crimes witnessed, or that are reported to them, which may have occurred in a Clery Geography. The University requires all CSAs to complete training and provides such training regularly.

B. **Clery Compliance Coordinator**

The University’s Clery Compliance Coordinator is:

Kelsey Hancock  
Compliance Officer – Campus Safety  
McClure Hall, Rm. 104  
918-631-2324  
clery@utulsa.edu

C. **Reporting**

All persons designated by the University as CSAs are required to promptly report all alleged Clery Crimes committed within Clery Geography that are reported to or witnessed by the CSA by completing a Crime Report to the Clery Compliance Coordinator using the University’s online **CSA Reporting Form**.

If a CSA receives a report of a Clery Crime or witnesses a Clery Crime that could constitute an ongoing threat to campus or an emergency, the CSA should immediately notify Campus Security at 918-631-5555 and then complete the CSA Reporting Form.

Upon receipt of a Crime Report, the Clery Compliance Coordinator will contact the CSA within 24 hours to confirm receipt of the report.
D. **Exemptions**

Under the Clery Act regulations, certain employees are specifically excluded from being a Campus Security Authority and having a mandatory reporting obligation. These employees include pastoral and professional counselors acting as pastoral or professional counselors.

The University encourages exempted employees to inform the persons they are counseling on procedures to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics.

E. **Crime Reporting Encouraged**

Whereas CSAs have an obligation to report all alleged or confirmed criminal activity described above, the University strongly encourages all members of the TU community to accurately and promptly report all criminal or suspicious activity and any potential emergencies to Campus Security (918-631-5555) or appropriate law enforcement agency.

F. **University Obligations**

On an annual basis, the Clery Compliance Coordinator, in conjunction with the Clery Compliance Committee, identifies positions that meet the definition of a CSA and oversees CSA training. The University requires all CSAs to complete their CSA training within 60 days of assignment. In addition to required training, the University provides several additional training opportunities for CSAs.

G. **Document Retention**

All records pertinent to Clery compliance are retained by the Clery Compliance Officer on behalf of the University for seven (7) calendar years. Unless otherwise instructed by the Office of General Counsel, all materials are destroyed in the beginning of the eighth (8th) calendar year. The Office of Compliance provides a written request and consults the Office of General Counsel to destroy all materials that fit the above listed criteria.

H. **Forms**

CSA Reporting Form

I. **Approval**

This Policy is approved by the undersigned and effective as of the date written below.

Approved: Matt Warren

Matt Warren, Vice President for Risk Management and Chief Compliance Officer

Date Effective: 04/01/2021
This policy is not a contract. The University of Tulsa reserves the right to modify, revise, rescind or grant exceptions to this policy.