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1. STATEMENT OF POLICY

To maintain a safe and secure environment for its employees, students, and visitors, Westminster College (College) will comply with the provisions of the Jeanne Clery Disclosure of Campus Crime Security Policy and Campus Crime Statistics Act of 1998 (Clery Act). The Clery Act requires the College to gather and report specified crime statistics occurring on or near the College and to provide other safety and crime information to the College community. This policy and related procedures set forth guidelines intended to facilitate the College’s compliance with the Clery Act.

2. TO WHOM THIS POLICY APPLIES

This policy applies to all members of the College community and provides information to College visitors, prospective students, and prospective employees.

3. DEFINITIONS

A. **Annual Security Report (ASR)** – The annual security report the College is required to publish no later than October 1 of each year.

B. **Annual Fire Safety Report (AFSR)** – The annual fire safety report the College is required to publish no later than October 1 of each year.

C. **Campus Security Authority (CSA)** – Individuals at the College who, because of their function and duties 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. CSAs need not be employees of the College and can include students and volunteers.

   **Designated CSA** – Defined as staff who have responsibility for campus security and/or those who have significant responsibility for student and campus activities.

   **Temporary CSA** – Defined as faculty and staff who oversee students for activities occurring off campus where overnight stays are required.

D. **Clery Crimes** – Clery Crimes means crimes that are required to be published and reported to the US Department of Education under the Clery Act.

E. **Clery Geography** – Clery geography means property on campus building or property, non-campus building or property, or public property.

F. **Daily Crime Log** – The log of all reported criminal incidents maintained by the Director of Campus Security and subject to public inspection.

G. **Emergency Notification and Evacuation Procedures** – The procedures the College will use to immediately notify the College community upon the confirmation of a significant
emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus.

H. **Timely Warning** – An alert triggered when the College determines that a crime which has already been committed but presents a serious or continuous threat (e.g., a homicide, sex offense, or robbery) must be reported to the College community.

### 4. CLERY ACT REQUIREMENTS

**A. Prepare, Publish and Distribute an ASR**

By October 1 each year, the College publishes an ASR documenting three calendar years of Clery crime statistics, security policies and procedures, and information on the basic rights guaranteed victims of sexual assault.

This report must be made available to all current employees and students. In addition, prospective faculty, staff, employees, and students must be notified of the ASR’s existence and provided a copy upon request. Paper copies of the report will be available upon request from the Campus Patrol Office. In addition, the Office of Admission and Department of Human Resources will publish a link to the ASR, with a brief description, on their respective web sites. This log is available to the public during business hours.

The Director of Campus Security is responsible to prepare, publish and distribute the ASR following the procedures set forth in **Appendix A**.

**B. Report and Disclose Crime Statistics**

The College reports to the Department of Education and discloses in its ASR statistics for the three most recent calendar years concerning the number of Clery Crimes that occurred on or within its Clery Geography, and that are reported to local police agencies or to a CSA.

The Director of Campus Security is responsible for reporting crime statistics following the procedures set forth in **Appendix B**.

The Director of Campus Security is responsible for submitting crime statistics to the US Department of Education annually as required.

**C. Maintain a Daily Crime Log**

The College maintains a Daily Crime Log that records, by date reported, the nature, date, time, and general location of each crime reported to Campus Patrol within the last 60 days; and the disposition, if known, of the reported crimes. The College will enter incidents into the log within two business days of receiving the report. The College posts the Daily Crime
Log on the College’s website. The Daily Crime Log is available for public inspection at the Campus Patrol Office of the College located at 1840 South 1300 East, Salt Lake City, UT 84105, during normal business hours. Requests for public inspection of daily crime log entries older than 60 days must be made in writing and will be made available within two business days of the request.

The Director of Campus Security is responsible for maintaining the Daily Crime Log following the procedures set forth in Appendix B.

D. Identify, Notify, and Train CSAs

The College collects crime reports from CSAs at the College. The College identifies, notifies, and trains CSAs at the beginning of the academic year and when an individual newly assumes the role as of CSA.

The Director of Policy Development and Insurance Programs is responsible for identifying, notifying, and training CSAs following the procedures set forth in Appendix B.

The Director of Campus Security is responsible for collecting crime reports from CSAs following the procedures set forth in Appendix B.

E. Issue Timely Warnings

The College issues Timely Warning notices to alert the College community about crimes that pose a serious or continuing threat to safety.

The Director of Campus Security is responsible for issuing Timely Warnings following the procedures set forth in Appendix C.

The Director of Campus Security is responsible for including a summary of the Timely Warning notification process in the ASR following the procedures set forth in Appendix A.

Exception: Crimes that would otherwise be reportable but are reported to a licensed mental health counselor or pastoral counselor, in the context of a privileged (confidential) communication, are not subject to the timely warning requirement.

F. Maintain Emergency Response and Evacuation Procedures

The College maintains emergency response and evacuation procedures that will be used to respond to a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus.
The Director of Campus Safety is responsible for structuring and executing training and tests of the emergency response and evacuation procedures on an annual basis to affirm their efficacy following the procedures set forth in Appendix D.

The Director of Campus Safety is responsible for including a summary of these procedures in the ASR following the procedures set forth in Appendix A.

Exception: Emergencies where issuing a notification would compromise efforts to assist a victim, contain the emergency, respond to the emergency, or mitigate the emergency, are not subject to the emergency notification requirement.

G. Respond to Reports of Missing Students

The College has established procedures that describe how it will respond to reports of missing students including certain notices that will be made once a student has been reported missing for 24 hours to law enforcement, the student’s designated emergency contacts, and, if the student is under 18, the student’s parents.

The Director of Campus Security is responsible for responding to reports of missing students following the procedures set forth in Appendix E.

The Director of Campus Security is responsible for including a summary of these procedures in the ASR following the procedures set forth in Appendix A.

H. Report and Disclose Fire Statistics

By October 1 each year, the College publishes an AFSR documenting three calendar years of fire statistics, fire safety policies and procedures, and information on fire evacuation procedures.

This report must be made available to all current employees and students. In addition, prospective faculty, staff, employees, and students must be notified of the ASR’s existence and provided a copy upon request. Paper copies of the report will be available upon request from the Campus Patrol Office. In addition, the Office of Admission and Department of Human Resources will publish a link to the ASR, with a brief description, on their respective web sites. This log is available to the public during business hours.

The Director of Campus Safety is responsible for compiling fire statistics following the procedures set forth in Appendix F.

The Director of Campus Security is responsible for preparing, publishing and distributing the AFSR following the procedures set forth in Appendix F.
The Director of Campus Security is responsible for submitting fire statistics to the US Department of Education annually as required.

5. RESPONSIBLE ADMINISTRATORS

The following administrators are accountable for compliance in the areas indicated. If a position becomes temporarily vacant, the Chief Risk Officer will assign an individual to assume temporary accountability until the position is filled.

A. The Director of Campus Security is responsible for:

- Monitoring the College’s compliance with the Clery Act;
- Annually reviewing geographic categories for inclusion;
- Maintaining the daily crime log;
- Requesting Clery crime statistics from local law enforcement;
- Developing procedures for reporting crime statistics by CSAs;
- Collecting crime reports from CSAs;
- Preparing and publishing the ASR;
- Preparing and publishing the AFSR;
- Serving as the record custodian for all Clery Act associated records; and
- Serving as the Chair of the Annual Security and Fire Safety Report Committee.
- Issuing Timely Warnings;
- Responding to reports of missing students;
- Providing paper copies of the ASR upon request; and
- Reporting crime and fire statistics to the U.S. Department of Education annually.

B. Campus Security Authorities are responsible for:

- Understanding the requirements of the Clery Act pertaining to reportable crimes;
- Undergoing training and education as determined by the Director of Policy Development and Insurance Programs; and
- Immediately reporting Clery crimes to the Campus Patrol.

C. The Office of the Dean of Students/Student Affairs is responsible for:

- Distributing the ASR and the AFSR to all current employees and students.
- Providing all conduct-related policy violation data to the Director of Campus Security for inclusion in the ASR; and
- Providing alcohol and drug program information to the Director Campus Security for inclusion in the ASR.
D. The Director of Campus Safety is responsible for:

- Executing training and tests of the emergency response and evacuation procedures on an annual basis;
- Collecting fire statistics relative to each on-campus student housing facility;
- Maintaining the daily fire log; and
- Compiling fire statistics and transmitting them to Director of Campus Security for inclusion in AFSR.
- Compiling fire statistics and transmitting them to the Director of Campus Security for reporting to the Department of Education.

E. The Director of Policy Development and Insurance Programs is responsible for:

- Maintain an accurate list of buildings and properties owned or controlled by the College;
- Identifying those positions with CSA responsibilities and notifying those individuals;
- Maintaining a list of CSAs;
- Educating and training CSAs, and personnel within the offices of campus patrol, campus safety, and student affairs as necessary;
- Establishing a procedure for processing instances of short-stay away trips in order to designate a CSA to disclose any Clery crimes reported during the trip to be included in the ASR;

F. The Director of Admissions is responsible for:

- Notifying and providing the on-line location of the ASR and a brief description of the report to prospective or current students; and
- Providing a paper copy of the ASR upon request to a prospective or current student.
- Notifying and providing the on-line location of the AFSR and a brief description of the report to prospective or current students; and
- Providing a paper copy of the AFSR upon request to a prospective or current student.

G. The Executive Director of Human Resources is responsible for:

- Notifying and providing to prospective faculty and staff the on-line location of the ASR and a brief description of the report;
- Providing a paper copy of the ASR upon request to a prospective or current faculty or staff member;
- Notifying and providing the on-line location of the AFSR and a brief description of the report to prospective or current faculty or staff member;
• Providing a paper copy of the AFSR upon request to a prospective or current faculty or staff member; and
• Annually, providing all conduct-related policy violation data to the Director of Campus Security for inclusion in the ASR.

6. RETALIATION

The College prohibits retaliation against anyone who exercises rights under the Clery Act and other related federal laws, including Title IX. Anyone found to have engaged in retaliatory behaviors may be subject to disciplinary sanctions under this policy.

7. RECORD RETENTION

The supporting records used in compiling the ASR shall be retained for three years from the latest publication of the report to which they apply. Records to be kept include, but are not limited to: copies of crime reports, the daily crime logs, records for arrests and referrals for disciplinary action, timely warning and emergency notification reports, documentation such as letters to and from local police having to do with Clery Act compliance, letters to and from CSAs, correspondence with the Department of Education regarding Clery Act compliance, and copies of notices to student and employees about the availability of the ASR. All documentation should be dated.

8. APPLICABLE PROCEDURES UNDER THIS POLICY

The following procedures implement this policy:

• Appendix A: Procedures for Preparing, Publishing, and Distributing the Annual Security Report
• Appendix B: Procedures for Reporting and Disclosing Crime Statistics
• Appendix C: Procedures for Timely Warning
• Appendix D: Procedures for Emergency Response and Evacuation
• Appendix E: Procedures for Missing Student Notification
• Appendix F: Procedures for Reporting and Disclosing Fire Statistics

9. RELATED POLICIES

• Policy on Sexual Assault, Sexual and Gender-Based Harassment, Gender-Based Discrimination, and Interpersonal Violence (Title IX Policy)
• Investigating and Resolving Reports of Sexual Assault, Sexual and Gender-Based Harassment, Gender-Based Discrimination, and Interpersonal Violence Committed by Students
• Investigating and Resolving Reports of Sexual Assault, Sexual and Gender-Based Harassment, Gender-Based Discrimination, and Interpersonal Violence Committed by Employees
• Emergency Management Policy and Plan

10. HISTORY

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<th>Date of Last Action</th>
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<tr>
<td>September 23, 2019</td>
<td>Title and responsibility changes</td>
<td>Policy Governance Committee</td>
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<tr>
<td>April 17, 2017</td>
<td>Final Clery Act Compliance Policy ADOPTED</td>
<td>Policy Governance Committee</td>
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<tr>
<td>March 10, 2017</td>
<td>Interim Clery Act Compliance Policy APPROVED</td>
<td>Policy Governance Committee</td>
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11. SIGNATURE, TITLE, AND DATE OF APPROVAL

Approved: /s/_________________________________________

Bethami A. Dobkin, President