



Campus Security Authority (CSA) Policy

Policy:

Campus Security Authorities (CSAs) are required to report in a timely manner certain actual or alleged criminal activity, known as Clery Act crimes, that they become aware of occurring on certain property designated as St. Bonaventure University Clery Act geography.

Purpose:

The Clery Act requires all institutions to collect crime reports from a variety of individuals and organizations that are considered "Campus Security Authorities" (CSAs). CSAs are mandated reporters to the Office of Safety & Security that serves as the designated University office to receive reported allegations of Clery Act crimes which a CSA receives in their capacity as a CSA, for inclusion into the University's daily crime log and annual disclosure of crime statistics, and to enable the University to determine whether circumstances warrant issuance of a Clery Act timely warning or emergency notification to the campus community.

Scope:

This policy applies to all Office of Safety & Security personnel, as well as all University employees, including student employees and graduate assistants, who have significant responsibility for student and campus activities, including but not limited to student housing professional staff, student conduct staff, coaches, and athletics staff. Employees falling within these categories are deemed by the University to be CSAs and will be notified of and must comply with their responsibilities under this policy. At St. Bonaventure University, specific CSA categories include all Safety and Security staff; Athletics Department staff, including the Director of Athletics; Student Life, Student Conduct and CARL staff; Student Success Center staff; Admissions staff; Residence Life staff; Library staff; Deans/Associate Deans/Assistant Deans; Title IX officials; Financial Aid/Registrar staff; identified Senior Executive Management Team members; University Ministries staff; Resident Assistants; faculty and staff advisors to student groups/club sports; and staff that supervisor student workers.

Procedures:

Identification and Notification of CSAs

CSAs are identified through a review process conducted by the University's Clery Compliance Committee, with annual notification of the designation from the Clery Compliance Officer (*Gary Segrue, Associate Dean for Campus Safety*). Annual notification to CSAs is made in writing, and provides information about their role and responsibilities for reporting crimes in accordance with this policy. The list of CSAs is maintained by the Clery Compliance Officer in the Office of Safety & Security, and can be found here: [\[link\]](#).

Training of CSAs

Training, which is mandatory, is provided to CSAs annually through on line and in person presentations, as requested.

Responsibilities and Reporting Procedures of CSAs

- 1) CSAs are responsible to report to the official or office designated by the University to collect crime report information, those allegations they receive of Clery Act crimes occurring on the University's Clery Act geography. At St. Bonaventure University, CSA reports are to be made to the Office of Safety & Security.
- 2) A CSA must file a report with the Office of Safety & Security immediately upon becoming aware of information that indicates that an actual or alleged Clery Act crime is occurring or may have occurred on the University's Clery Act geography. Timely reporting by CSAs to Safety & Security is extremely important. If a crime that may cause a serious or ongoing threat to the St. Bonaventure community is reported to anyone who is defined as a CSA, an immediate report to the Office of Safety & Security will enable the University to issue a timely warning and/or emergency notification to the campus community. In addition, timely reporting enables the Office of Safety & Security to make the required entry on the University's Clery Act crime log and enables the University to record the crime in its annual statistical reporting under the Clery Act. As such, CSAs are obligated to report crimes immediately to Safety & Security in person at Robinson Hall or at **716.375.2525**.
- 3) CSAs must also complete a [CSA Report Form](#) online, even when a verbal report has been made to the Office of Safety & Security.
- 4) CSAs are responsible for reporting allegations of Clery Act crimes that are reported to them in good faith in their capacity as a CSA. This means that CSAs are **not** responsible for investigating or reporting incidents that they overhear students talking about in a hallway conversation; that a classmate or student mentions during an in-class discussion; that a victim mentions during a speech, workshop, or any other form of group presentation; or that the CSA otherwise learns about in an indirect manner.
- 5) CSAs are not responsible for (a) determining whether a crime took place, (b) apprehending the alleged perpetrator (and CSAs should not attempt to do so), or (c) convincing a victim to contact law enforcement if the victim chooses not to do so. A CSA should not decline to report an allegation of a Clery Act crime to the Office of Safety & Security based on the CSA's doubt as to whether the alleged crime actually occurred.
- 6) CSA reports should include personally identifying information if available and permitted by the victim. Reports may, however, be filed without providing the name of the victim. A CSA should explain to the reporting person, victim, witness, or offender that they are required to submit the report for statistical purposes. In most cases it is possible for a CSA to fulfill their responsibilities while still maintaining victim confidentiality. CSA reports are used by the University to compile statistics for Clery Act reporting and to **help determine if there is a serious or continuing threat to the safety of the campus community** that would require an alert (i.e., a timely warning or emergency notification). Reporting responsibilities can usually be met without disclosing personally identifiable information. However, in some circumstances disclosure of personally identifying information may be necessary, for example to address an active threat.
- 7) Employees who are professional mental health or pastoral counselors are not considered CSAs, and are exempt from the requirement to disclose reported offenses, if they learn of the offense while acting in their professional capacity as pastoral or professional counselors. If they have significant responsibility for student and campus activities and receive reports of Clery Act crimes other than in their professional capacity, they will be deemed CSAs in that capacity and must make reports as described above and otherwise comply with the terms of this policy.
- 8) CSAs are required to annually, or when requested to, complete a reporting audit form, whether or not they have already reported all crimes. **CSAs are required to respond.**

- 9) CSAs who fail to report crimes they are aware of or who fail to complete the reporting audit form referenced above are subject to appropriate disciplinary action under the Code of Conduct, Staff Handbook or Faculty Handbook, as applicable.

Definitions:

Campus Security Authority (CSA): Campus Security Authority is a Clery Act-specific term that encompasses four groups of individuals and organizations associated with an institution.

- A campus police department or a campus security department of an institution.
- Any individual or individuals who have responsibility for campus security but who do not constitute the campus police department or campus security department.
- Any individual or organization specified in an institution's statement of campus security policy as an individual or organization to which students and employees should report criminal offenses.
- An official of an institution who has significant responsibility for student and campus activities, including, but not limited to, student housing, student discipline and campus judicial proceedings.

There are two types of individuals who, although they have significant responsibility for student and campus activities, are not campus security authorities under the Clery Act:

- **Pastoral counselor:** A person who is associated with a religious order or denomination, is recognized by that religious order or denomination as someone who provides confidential counseling, and is functioning within the scope of that recognition as a pastoral counselor.
- **Professional counselor:** A person whose official responsibilities include providing mental health counseling to members of the institution's community and who is functioning within the scope of his or her license or certification.

The Annual Security and Fire Safety Report includes statistics on Clery Act crimes that have been reported through the Center for Student Wellness on a confidential basis.

A list of individuals who the University has determined to be CSAs is on file in the Office of Safety & Security.

Clery Act crimes:

- **Criminal Offenses**—Criminal Homicide, including Murder and Non-negligent Manslaughter, and Negligent Manslaughter; Sexual Assault (*also referred to as Sex Offenses*), including Rape, Fondling, Incest and Statutory Rape; Robbery; Aggravated Assault; Burglary; Motor Vehicle Theft; and Arson;
- **Hate Crimes***—Any of the above-mentioned Criminal Offenses, and any incidents of Larceny-Theft, Simple Assault, Intimidation, or Destruction/Damage/ Vandalism of Property that were motivated by bias;
- **VAWA Offenses**—Any incidents of Domestic Violence, Dating Violence and Stalking. (Note that Sexual Assault is also a VAWA Offense but is included in the Criminal Offenses category for Clery Act reporting purposes); and
- **Arrests and Referrals for Disciplinary Action** for Weapons (Carrying, Possessing, Etc.) Law Violations, Drug Law Violations and Liquor Law Violations.

***Bias Categories:** Includes bias with respect to the victim's actual or perceived Race, Religion, Sexual Orientation, Gender, Gender Identity, Ethnicity, National Origin and Disability.

Clery Act geography: For the purposes of collecting statistics for submission to the U.S. Department of Education and for inclusion into the Annual Security Report (ASR), Clery Act geography includes buildings and property that are part of the University's campus(s), which include a subset of on-campus student housing where applicable, the University's non-campus buildings and property, and the public property within or immediately adjacent to and accessible from the campus.

- **On-Campus** - (1) Any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institution's educational purposes, including residence halls; and (2) Any building or property that is within or reasonably contiguous to the area identified in paragraph (1), that is owned by the institution but controlled by another person, is frequently used by students, and supports institutional purposes (such as a food or other retail vendor).
- **Non-Campus Building or Property** - (1) Any building or property owned or controlled by a student organization that is officially recognized by the institution; or (2) Any building or property owned or controlled by an 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.
- **Public Property** - All public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus or immediately adjacent to and accessible from the campus. The crime statistics do not include crimes that occur in privately owned homes or businesses within or adjacent to the campus boundaries.

Report: Crimes are considered "reported" when brought to the attention of a CSA by a victim, witness, other third party or even the offender. It does not matter whether or not the individuals involved in the crime, or reporting the crime, are associated with the institution. If a CSA receives a report, he or she must include it as a crime report using the procedures specified in this policy.

Questions:

Questions should be directed to the St. Bonaventure University Clery Compliance Officer, Gary Segrue, *Associate Dean for Campus Safety* at 716.375.2526 or @gsegrue@sbu.edu.