



OLD DOMINION UNIVERSITY

University Policy

Policy #3012

SAFETY AND SECURITY POLICY

Responsible Oversight Executive: Chief Operating Officer
Date of Current Revision or Creation: May 16, 2013

A. PURPOSE

The purpose of this policy is to define the specific responsibilities of the Old Dominion University Police Department (ODUPD) and other University offices with responsibilities for the safety and security of the University community and the committee structure responsible for oversight in compliance with the [Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, Sections 23-9.2:9-11 of the Code of Virginia](#) and the [Higher Education Act of 1965 as amended](#).

B. AUTHORITY

[Virginia Code Section 23-9.2:3, as amended](#), grants authority to the Board of Visitors to establish rules and regulations for the institution. Section 6.01(a)(6) of the [Board of Visitors Bylaws](#) grants authority to the President to implement the policies and procedures of the Board relating to University operations. Section 7.01 of the Board of Visitors Bylaws grants specific authority to the University Auditor.

[Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act \(Clery Act\)](#)

[Higher Education Act of 1965, as amended](#)

[Drug Free Workplace Act of 1988](#)

[Virginia Code Section 23-9.2:9-11, as amended](#)

[Commonwealth's Department of Human Resource Management Policy 1.80, Workplace Violence](#)

[Old Dominion University Board of Visitors Policy 1014 – Threat Assessment](#)

[University Policy 6501 – Workplace Violence Prevention Policy](#)

C. DEFINITIONS

Campus - The term “campus” means (1) any building or property owned or controlled by an institution of higher education within the same reasonably contiguous geographic area of the institution and used by the institution in direct support of, or in a manner related to, the institution’s educational purposes, including student housing facilities; and (2) property within the same reasonably contiguous geographic area of the institution that is owned by the institution but controlled by another person, is used by students, and supports institutional purposes (such as a food or other retail vendor).

Campus Security Authority – The Clery Act regulations define a Campus Security Authority as: a member of 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 a campus police department or a campus security department (e.g., an individual who is responsible for monitoring the entrance into institutional property); 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; and 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. An official is defined as any person who has the authority and the duty to take action or respond to particular issues on behalf of the institution.

Risk Assessment - The process of identifying types of risks or hazards that could affect the institution, including (1) hazard identification, the determination of potential risks, hazard events, or liabilities; (2) hazard characterization, the evaluation of which personnel, property, income or assets are most vulnerable to injury or damage from these hazards by severity and frequency; (3) exposure assessment, estimation of potential losses; and (4) risk characterization, the prioritization of various risk exposures.

Risk Management - The policies, procedures, and practices associated with the identification, analysis, and assessment of risk exposures and appropriate strategies to eliminate, control, minimize or avoid unacceptable risks. Control strategies may include risk assumption, risk avoidance, risk retention, risk transfer, or any other strategy or combination of strategies to manage future events.

Senior Administrator - A person on the President’s Cabinet or a designee.

Threat Assessment - A fact-based investigative, analytical approach that evaluates whether an individual’s behavior poses a risk to his/her safety or the safety of others. The risk assessment in any given situation should focus on the actions, communications, and specific circumstances of an individual that might suggest that the individual is on a pathway to harm or intends to commit a violent act and/or is engaged in planning or preparing for that event.

D. SCOPE

This policy applies to all employees, students, volunteers, employees of affiliated organizations, and visitors to the institution. Employees include all staff, administrators, faculty, full- or part-time, and classified or non-classified persons who are paid by the University. Students include all persons attending classes whether enrolled or not enrolled. Affiliated organizations are separate entities that exist for the benefit of the University and include the Foundations, the Community Development Corporation, and the Alumni Association. Visitors include vendors and their

employees, parents of students, volunteers, guests, uninvited guests and all other persons located on property owned, leased, or otherwise controlled by the University.

E. POLICY STATEMENT

Old Dominion University is committed to the safety and welfare of the members of the University community. In furtherance of that goal, the University has established reasonable practices that: (1) support a safe and secure environment in the buildings and grounds owned, leased and/or controlled by the University; (2) promote safety through policies and programs; (3) provide an appropriate level of security at University activities; and (4) safeguard the University's property and physical assets.

All employees, students, and other members of the community share responsibility for the safety and security of the institution and must conduct University activities and operations in compliance with applicable Federal and State regulations and University policies. Furthermore, University facilities must be used in a safe and appropriate manner so as not to endanger the University community or the general public.

Individual employees, students, and other members of the community also are strongly encouraged to accurately and promptly report crimes, emergencies, potential threats, or risks to the ODUPD for investigation, action, analysis and statistical recording.

F. PROCEDURES

As part of an institution-wide commitment to a safe and secure University community, the University has established offices specifically charged with security and safety responsibilities and created a committee structure to provide general oversight and leadership for the University's security, safety, and violence prevention efforts.

1. Committee Structure

a. University Safety and Security Policy Committee

The University Safety and Security Policy Committee is a standing committee appointed by the Chief Operating Officer to serve as a coordinating and policy body, with responsibility to establish the framework for an overarching University safety, emergency management, and security program for all facilities (on- and off-campus, owned and leased). The committee, whose Chair will be appointed by the Chief Operating Officer, shall consist of a representative of University General Counsel, a representative from Public Safety, and additional members as appointed. The Committee will also ensure that a framework is implemented through the appropriate offices; evaluate the overall safety and security infrastructure; and provide oversight to the work of University operational committees responsible for environmental health and safety, violence prevention, emergency management, and other safety and security related efforts.

Specific Committee responsibilities include:

- Reviewing, evaluating, and determining requirements concerning safety and security assessments, plans, programs, and education, including changes that may affect the quality of the University's living, learning and working environment;
- Overseeing reviews of the University's assessment of vulnerabilities, hazards and risks related to the safety and security of individuals and the physical campus;
- Ensuring that sufficient University resources and funding are available to perform necessary emergency management, safety, and security functions and that these resources are consistent with anticipated regulatory changes;
- Overseeing the education and prevention of violence at the University in accordance with [Section 23-9.2:10 of the Code of Virginia](#) including providing direction to the Workplace Violence Prevention Committee and the Threat Education, Assessment & Management Team on the development and implementation of violence prevention policies, procedures, education and guidance regarding recognition and reporting of individuals whose behavior may pose a threat, assessment of such individuals and means of action to resolve potential threats;
- Overseeing the application of the Safety and Security Policy and other policies that have implications for emergency management, safety, and security, including but not limited to facilities use, resource allocation, sponsorship of entertainment and events, threatening or intimidating conduct, facilities access control, environmental health and safety, and violence prevention;
- Reviewing and establishing guidelines and standards for departmental emergency response and continuity of operations plans;
- Evaluating the effectiveness of the University's safety and security plans and programs; and
- Advising the Chief Operating Officer on safety and security issues.

b. Threat Education, Assessment & Management Team

The Threat Education, Assessment and Management Team, established by the Board of Visitors in accordance with [Section 23-9.2:10 of the Code of Virginia](#), serves the entire University community, including visitors and guests. The Team is responsible for educating the University community to identify and report threats and other behaviors of concern; evaluating the risk of violence posed by an individual or group reported to the Team; evaluating the risk of self-harm; developing the most appropriate response congruent with the investigation and risk assessment, including referrals to appropriate University officials, mental health professionals and/or law enforcement agencies; assisting the potential target(s) of violence in developing and implementing appropriate preventative safety measures; consulting with University community members who have concerns about the safety or well-being of students, faculty and staff members of Old Dominion University; creating, revising, or recommending policies and procedures that will advance campus safety and/or threat assessment team functions; and providing recommended action for those who exhibit behaviors of concern.

c. Workplace Violence Prevention Committee

The Workplace Violence Prevention Committee is an operational committee established by [University Policy #6501, Workplace Violence Prevention Policy](#), and is one of the components of the violence prevention committee structure approved by the Board of Visitors in accordance with the provisions of [Section 23-9.2:10 of the Code of Virginia](#). The Committee is appointed by the Vice President for Human Resources. It is charged with education and prevention of violence at the University and is responsible for developing and implementing violence prevention and education procedures, programs, and guidance. The Committee has oversight responsibilities for University compliance with all workplace violence prevention laws and regulations.

d. Emergency Operations Management Team

The Emergency Operations Management Team shall be convened when any significant hazard exists that has the potential of endangering the safety of members of the University community or poses a threat to University property. The Team shall consist of the ODU Chief of Police and a representative of the following offices: Academic Affairs, Administration and Finance, Student Engagement and Enrollment Services, University Relations; and other members as appointed by the Chief Operating Officer. The Team shall be responsible for initiating the Emergency Operations Plan and making recommendations to the Chief Operating Officer.

e. Health Safety Committee

The Health Safety Committee is a standing committee convened at the call of the Chief Operating Officer to address health and safety issues that have implications toward the entire University community (e.g., Pandemic Flu).

2. Departments and Offices with Safety and Security Responsibilities

Old Dominion University's commitment to the safety and welfare of the University community is demonstrated by an organizational and programmatic structure that defines the authorities and responsibilities of University departments to carry out programs and operations that promote the safety and security of individuals and property. Departments reporting to the Chief Operating Officer, the Vice President for Administration and Finance, and the Vice President for Student Engagement and Enrollment Services provide related support functions and direct services.

a. Old Dominion University Police Department (ODUPD)

The ODUPD is a law enforcement agency certified by the Virginia Department of Criminal Justice Services and empowered by the Code of Virginia to enforce State and local laws, make arrests, conduct criminal investigations, and perform other law enforcement activities. ODUPD has concurrent jurisdiction as well as equal authority with the Norfolk Police Department in designated areas. The ODUPD responds to and investigates alleged criminal offenses on property owned or leased by the University and has entered into various mutual aid agreements to obtain assistance from and provide assistance to local police departments. The University, through the police department, monitors and records student off-campus criminal activity by communicating and assisting local law enforcement, as needed. The ODUPD also has

responsibility to prepare the annual security and fire safety report required by the Clery Act.

b. Office of University Relations

The Office of University Relations has primary responsibility for coordinating and disseminating University communications. Emergency communications from ODUPD are coordinated with the Office of University Relations when time permits, and additional information regarding emergencies is prepared in cooperation with and disseminated by the Office of University Relations after the event. The Office of University Relations utilizes the University Alerts emergency communication system, University email, the University web site, automated information telephone lines, local media outlets and other communications vehicles to inform the University community.

Annually, the Office of University Relations, in conjunction with the Office of Human Resources, will provide communications to the University community regarding University procedures for authorized closings and receiving emergency alerts.

c. Housing and Residence Life

Housing and Residence Life allocates resources necessary to ensure the safety and security of campus student housing facilities. Housing and Residence Life staff members receive training to promote a security consciousness and routinely check for propped security doors, suspicious acts or persons, and monitor the residence halls for unauthorized guests. These individuals also perform health and safety checks on residents, coordinate emergency evacuation and warning procedures, and facilitate the performance of fire, tornado, and other drills.

Missing Student Procedure (Included in the [Annual Security and Fire Safety Report](#)): Immediately upon becoming aware that a residential student is missing, Housing and Residence Life staff will activate the missing resident student procedure, which shall include immediate notification to the ODUPD. ODUPD will initiate an investigation in compliance with police department policies, procedures, and the law.

d. Women's Center

The Women's Center provides crisis intervention and advocacy services to students and employees who have been affected by sexual assault, relationship violence, stalking, cyberstalking, and sexual harassment. The Women's Center is also responsible for providing outreach and education to the University community on issues involving violence against women and reviewing University policies related to these issues. The Women's Center provides anonymous information to the ODUPD on sexual violence crimes that occur on or off campus in order to remain in compliance with the Clery Act. With the victim's consent, the Women's Center may also need to share information with the Old Dominion University Sexual Assault Resource Team (S.A.R.T.) in order to provide sexual assault support services to students and employees. In rare instances, information may need to be shared with selected campus administrators, without the victim's permission, when there is a safety threat to the University community.

e. Office of Risk Management

The Office of Risk Management handles all insurance matters, including claims and liability risk evaluations for University activities. The Office provides evaluation and training in risk management on behalf of the University and its corporations, has specific responsibility for current property and casualty insurance policies and coverage for University property and automobiles, and has the additional responsibility to administer the property, general liability, automobile, boiler and machinery, medical malpractice, and related insurance programs of the University and associated claims. The Office of Risk Management also oversees the University Fire Safety Office, which provides fire and life safety services and education to the University community and fire safety statistics for the [Annual Security and Fire Safety Report](#).

f. Office of Research

The Director of Research Compliance, reporting to the Vice President for Research, oversees compliance with applicable laws, regulations, and guidelines associated with research and education.

g. Student Health Services

Student Health Services is responsible for monitoring and responding to outbreaks of communicable disease or any significant threats to health that could impact the University community. The Office is also the point of contact for communication with local public health authorities regarding reportable infectious diseases and/or health threats. Student Health Services staff, in conjunction with the Health Services Committee as needed, work closely with the Office of University Relations staff to provide current information on health related-emergencies and recommend appropriate responses.

h. Counseling Services

Counseling Services provides mental health services to the University community. In addition to the immediate availability of counseling services during University business hours, a 24-Hour Emergency On-Call System responds to mental health crises that may occur after hours or when the University is closed. Psychiatric evaluation, medication evaluation and consultations for mental health concerns are also provided.

i. Office of Environmental Health and Safety

The Office of Environmental Health and Safety develops policies, programs and training to support University compliance with Federal and State laws, regulations and standards related to workplace and laboratory safety. The Office supports University efforts to identify, evaluate and control hazards, including environmental monitoring services, waste disposal, industrial hygiene monitoring, and the evaluation and management of potential health and safety hazards. The Office evaluates safety risks and provides training to employees and students to reduce the risk of accident, injury or illness, fires, hazardous materials incidents, and laboratory accidents.

j. University Auditor

The University Auditor is responsible for periodic reviews of various aspects of physical security, health and safety as part of an annual risk-based audit plan in order to ensure that the audited department is in compliance with University policies and Federal and State regulations. Any reportable audit findings and recommendations are addressed directly to the audited department and University President and are communicated to the Audit Committee of the Board of Visitors.

k. University Counsel

The Office of University Counsel provides legal advice concerning safety and security issues to members of the University community.

l. Departmental Responsibilities

Directors/Department Heads and individuals in supervisory roles are responsible for ensuring that personnel within their departments are aware of safety and security policies and the procedures for reporting safety problems, accidents, emergencies, crimes, and threats. They are also responsible for ensuring that emergency preparedness and Continuity of Operations Plans are developed in accordance with University guidelines and communicated to all personnel in order to ensure familiarity with and coordination between departmental personnel and emergency responders. In compliance with the University's Emergency Response and Continuity of Operations Plans, departments are responsible for developing internal procedures to communicate with members of their departments.

3. Federal Directives

a. The [Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act \(Clery Act\)](#)

The Clery Act defines the specific responsibilities for colleges and universities to make the University community aware of crimes that have occurred and necessitate caution on the part of students and employees and for providing annual reports on campus crime statistics. As required by the Act, "immediate notifications" will be provided to the community in the event that a situation arises, either on campus or off, that, in the judgment of the Director of Public Safety/Chief of Police, constitutes an ongoing or continuing threat. Section 2(b) of this policy describes the methods used to provide emergency notifications.

The Director of Public Safety/Chief of Police will be responsible for gathering and publishing the [Annual Security and Fire Safety Report](#) and maintaining the Crime Log as required by the Clery Act. This report contains statistics on criminal incidents occurring within the Clery defined geographic area, hate crimes as defined by the Clery Act, as well as the number of arrests and judicial referrals for alcohol, drug, and weapons violations. Annual statistics are also published related to fires in residential facilities. The Director of Public Safety/Chief of Police must also make generally available to all current and prospective students and employees an annual report of University security policies and crime and fire statistics (covering the reporting period January 1 to December 31) for the last three reporting periods, and notice of the report's availability will be provided electronically.

- b. The Higher Education Act of 1965, as amended

University emergency management procedures comply with the provisions of the [Higher Education Act of 1965, as amended](#), including statements of campus policies for emergency response and publication of evacuation procedures, emergency communications and timely notifications in the event of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on campus, and testing of emergency evacuation procedures on an annual basis. Emergency response and evacuation procedures are located in the Emergency Operations Plan.

- c. Campus Fire Safety Right-to-Know Act (as included in [The Higher Education Opportunity Act](#))

Annual fire safety reporting to the University community, prospective students and the Secretary of Education is required. The annual fire safety report will include both data from a log of fire-related events over the last two years as well as other campus fire safety information. Statistics will be collected by the University Fire Safety Office and reported to the Secretary of Education and to ODUPD for their use as needed.

4. Facilities Design Standards and Building Access Control

Security and access control design standards have been developed for new and renovated buildings owned by the University. Designs are reviewed by the ODUPD for compliance with security requirements. The ODUPD will also evaluate Housing and Residence Life security measures to ensure that adequate security protocols are in place for student housing facilities. Entrances to student housing facilities shall be locked at all times. Exterior doors in all student housing facilities shall remain locked except in those buildings that house University offices. In addition, exterior entrances are allowed to be unlocked during official move-in hours each fall. Residents of the building and their escorted guests, as well as authorized persons, access the building by utilizing the card access system.

Academic and administrative facilities are open to the public during operating hours and are secured after operating hours and during extended breaks.

5. Emergency Management Plans

Emergency management plans and programs address mitigation and prevention, preparedness, response and recovery. The plans describe management structures, emphasize preparedness, and identify interdependencies of functional areas and external partners.

6. In accordance with Establishing Preparedness Initiatives in State Government, compliance with [Executive Order No. 41 \(2011\)](#) and [Section 23-9.2:9 of the Code of Virginia](#), the University shall develop, adopt, and keep current a written crisis and emergency management plan; every four years the University shall conduct a comprehensive review and revision of its plan. It is the responsibility of the Emergency Management Operations Team Leader (Director of Public Safety/Chief of Police) to oversee the annual review and update of these plans. Procedures to guide departments in developing emergency preparedness and Continuity of Operations Plans are established by the University to be

consistent with Federal and State requirements. Departments are responsible for maintaining these plans in accordance with University guidelines and timelines.

- Hazard Mitigation Plan: The plan includes an analysis of natural and man-made hazards and the development of policies, programs, and practices to assess and mitigate these risks.
- Emergency Operations Plan (EOP): The Emergency Operations Plan establishes a management framework and outlines procedures for managing major emergencies that may threaten the health and safety of the campus community or disrupt business operations on the campus.
- Continuity of Operations Plan: The Continuity of Operations Plan (COOP) establishes operational and restoration procedures for essential functions. The plan focuses on basic COOP elements: management framework, essential functions, critical systems, alternate facilities, orders of succession, delegations of authority and vital records. The COOP must be updated annually.

G. RESPONSIBLE OFFICERS

Director of Public Safety/Chief of Police
Associate University Counsel
Assistant Vice President for Marketing and Communications
Assistant Vice President for Engagement

H. RELATED INFORMATION

[The Handbook for Campus Safety and Security Reporting](#), U.S. Department of Education

[Board of Visitors Policy 1530 – Code of Student Conduct](#)

[University Policy 1020 - Inclement Weather and Emergencies](#)

[University Policy 3201 – Issuing of University Facilities Keys](#)

[University Policy 3202 – Issuing of Housing Operations Keys](#)

[University Policy 3221 - Hazardous Waste Collection and Disposal](#)

[University Policy 3222 - Asbestos Containment and Abatement Procedures](#)

[University Policy 3223 - Workplace Health and Safety Policy](#)

[University Policy 4600 – Sexual Misconduct Policy](#)

[University Policy 6603 - University Drug and Alcohol Policy](#)

[Housing and Residence Life Policies & Procedures Manual](#)

[Annual Security & Fire Safety Report](#)

POLICY HISTORY

Policy Formulation Committee (PFC) & Responsible Officer Approval to Proceed:

/s/ Rhonda Harris April 10, 2013
Responsible Officer Signature Date

/s/ Donald Stansberry April 15, 2013
Responsible Officer Signature Date

/s/ Jennifer M. Collins April 15, 2013
Responsible Officer Signature Date

/s/ James D. Wright May 3, 2013
Responsible Officer Signature Date

Policy Review Committee (PRC) Approval to Proceed:

/s/ Donna W. Meeks February 26, 2013
Policy Review Committee (PRC),
Chair Signature Date

Executive Policy Review Committee (EPRC) Approval to Proceed:

/s/ David F. Harnage May 7, 2013
Responsible Oversight Executive Signature Date

University Counsel Approval to Proceed:

/s/ R. Earl Nance May 7, 2013
University Counsel Date

Presidential Approval:

/s/ John R. Broderick May 16, 2013
President Date

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