

**NATIONAL-LOUIS UNIVERSITY
OPERATIONAL SERVICES POLICY AND PROCEDURE**

POLICY TITLE:	Public Safety Policy & Procedures Handbook
EFFECTIVE DATE:	September 1, 2010
SCOPE:	Faculty, Full-time Staff, Part-time Staff, Student Employees, Visitors, Guests, Lessees
REPLACES POLICY DATED:	9/1/2002

PURPOSE

Under the provisions of Title II of the Act, known as the "Campus Crime Awareness and Security Act of 1990", colleges and universities are required to publish and distribute information on campus security policies and procedures and campus crime statistics.

POLICY

National-Louis University seeks to position and maintain its facilities in convenient, safe locations. This is a prime consideration as new space is either leased or purchased. In addition, policies and safety procedures are established to ensure that the possibility of criminal offense is diminished, and public safety is enhanced.

The University Security Council is charged with the regular review of and adjustment to all policies and practices related to public safety and security, including student and employee publications of related material.

- The University Catalog and Student Handbook contain information and policies for students of the University.
- Employees of the University may contact the Human Resources Department for specific information on policies related to Public Law 101-542, called the Campus Crime Awareness and Security Act of 1990.

University Policies Related to Security & Public Safety:

- **Access policies** for the Residence Hall are contained in the Residence Hall Handbook, and for the campus buildings in the Operational Services Policy Guidebook.
- **Parking, physical facilities/property, and personal or physical safety** Information and policies pertaining to are found in the section "Student Information and Regulations" of the Student Handbook. Additional information is contained in the Residence Hall Handbook, and the Operational Services Policy Guidebook.
- Statements of policy concerning the **possession, use or sale of alcoholic beverages and illegal drugs** are found in the section "Student Information and Regulations" of the Student Handbook.

- **Policy on Inspection, Search and Seizure** reinforces the commitment of the institution in attending to the above policies is found in the Student Handbook.
- Disciplinary actions which NLU may impose for violations of University policies are found in Student Hearing and Appeal Policy. Policies pertaining to **disruptive behavior** are found in the Policy on Disruptive Classroom Behavior, which is in the Student Handbook.
- Disciplinary actions related to employees of the University are described in the Employee Handbook issued by Human Resources.
- Questions on the above statements should be directed to the Executive Director of Student Affairs or Vice-President of Human Resources.

University Programs Related to Safety and Security:

Programs such as alcohol/drug awareness, presentations on safety precaution, campus safety policies and crisis intervention procedures for non-counseling situations which inform students and employees about campus security procedures are offered frequently. Please consult with the Office of Student Affairs for further information on these programs.

NLU Identification Card:

Students, faculty, and staff are required to carry the NLU Global-ID card when present on one of the campuses or academic centers or at a class function sponsored by the University. Students are required to surrender the Global-ID card upon the request of any University Official. The card is not transferable and is the property of the University. Faculty and staff are required to surrender the Global-ID card upon leaving the University or at the request of senior management/officers.

Policy for Reporting the Annual Disclosure of Crime Statistics

The University's Public Safety Office prepares this report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act. The full text of this report can be located on our web site at www/nl.edu.

This report is prepared in cooperation with the Housing and Residential Services, the Judicial Affairs Officer, the Division of Finance & Administration, and the Division of Student Affairs. Each entity provides updated information on their educational efforts and programs to comply with the Act.

Crime statistics gathered by local law enforcement agencies surrounding our campus and alternate sites may be obtained through the State Police office where the site is located and are not included in the annual report by the University.

Campus crime, arrest and referral statistics include those reported to the NLU officials. Department of Counseling and Psychological Services staff inform their clients of the procedures to report crime to the Public Safety Office or Executive Director of Student Affairs on a voluntary or confidential basis, should they feel it is in the best interest of the client. A procedure is in place to anonymously capture crime statistics disclosed confidentially during such a session.

Each year, an e-mail notification is sent to all enrolled students that provides the web site to access this report. Faculty and staff receive similar notification. Copies of the report may also be obtained at the Student Affairs and Facilities Management offices at any NLU campus. All prospective employees may obtain a copy from Human Resources by calling 847-947-5215.

Policy Statement - Campus Law Enforcement

National-Louis University Safety officers, Officers of the Corporation, Deans, and certain other Department heads related to student or personnel services have the authority to ask persons for identification and to determine whether individuals have lawful business at the University, and are permitted to request return of the University Photo-ID card and/or ask a person to leave the campus if they cannot demonstrate related business with the University or cannot cease the disturbance they are causing.

Safety officers and other parties named above do not possess arrest power. All criminal incidents are referred to the local police jurisdictions, which have authorization to enter the campuses and take appropriate action as required.

The Public Safety Office at the University maintains a professional working relationship all local police and fire jurisdictions surrounding the individual campus locations.

All crime victims and witnesses are strongly encouraged to immediately report the crime to campus Safety and Security Office and the appropriate police agency. Prompt reporting will assure timely warning notices on-campus and timely disclosure of crime statistics.

Public Safety personnel are employed at the Chicago Campus during regular operating hours. They are unarmed contracted staff who have completed the basic Illinois course for security personnel as a minimum for employment at the University.

Public safety at the other sites is handled by the Facilities Management staff.

Relationships with Local Law Enforcement:

National-Louis University will regularly meet with the local police and fire department authorities for the jurisdictions in which campuses are maintained to arrange for:

- Fire Drills, with feedback reports
- Evacuation Drills, with feedback reports
- Lockdown Drills, with feedback reports
- Other Emergency Procedures review and updating
- Fire, Medical, and Police involvement with campus incident

Memorandums of Understanding:

The MOU's suggested by the HEA are being developed for all campus sites to document the arrangements in place between the University and local jurisdictional support organizations.

Reporting of Crimes or Perceived Policy Violations:

Anyone within the University community who knows of, sees, or becomes aware of a violation of University policy taking place is required to report that activity to either the Office of Student Affairs or the Operations office of the campus immediately.

An incident report form and crisis intervention procedure is provided to assist you with the handling and reporting of incidents at all locations. **Criminal offenses should be reported to the local police immediately**, as well as to a member of the facilities/security force or Vice-President for Operations.

The contact information to reach University public safety and Facilities Management staff is included at the end of this publication. The Public Safety Officers, or Facility Managers, will initiate appropriate activities and report to

Notice of Availability of Annual Security Report

A full copy of National-Louis University's Annual Security Report is produced for the Student Affairs and Facilities Management office at each campus, and for the President, Provost, VP-Finance/Administration, and Legal Counsel's office.

A summarized version is printed for handout to any interested party, and copies are available at various table-top locations throughout the campuses.

This report includes statistics for the previous three years concerning reported crimes that occurred on-campus; and on public property within, or immediately adjacent to and accessible from, the campus. The report also includes institutional policies concerning campus security, such as policies concerning sexual assault, and other matters. You can also obtain a copy of this report by:

- Visit any Student Affairs Office, all parties
- Visit the Human Resources Dept at Wheeling, or call 847-947-5215(prospective employees)
- Accessing the following web site www.nl.edu

Hate Crime Reporting: National-Louis University has adopted, in accordance with the Higher Education Act, the following policy and procedures related to law enforcement at sites owned or operated by the University.

The statistical gathering tools have been reformatted to include the additional crimes required by the HEA effective with the 2010 reporting period. Personnel responsible for determining the information that classifies a crime as a Hate Crime have been provided materials and are familiar with the requirements of the changes for reporting purposes.

A system has been implemented to protect the privacy of individuals involved in hate crimes while allowing accurate reporting and documentation of such incidents. Investigations into incidents between faculty, students, and staff are handled by the following University authorities, in consultation with local jurisdictional authorities as necessary:

Student to Student Incidents	Executive Director of Student Affairs, Provost
Student to Faculty/Staff Incidents	Legal Counsel, Executive Director of Student Affairs VP-Human Resources
Personnel to Personnel Incidents	Legal Counsel, VP-Human Resources

In consultation with outside authorities, the above designated parties will determine if an incident merits inclusion in annual reporting as a Hate Crime and provide the statistical information required in the annual reports to the VP-Operations, excluding personal data which should be maintained in confidence.

Emergency Response and Evacuation Procedures

The University has put into place an Emergency Operating Procedures Manual in accordance with legal requirements, utilizing portions of the N.I.M.S. structure.

The Manual includes emergency procedures for approximately 20 emergency scenarios, a modernized communications plan with instant alerting systems, and a command/control plan.

The manual includes procedures to:

- Immediately notify the campus community of significant emergency or dangerous situations;
- Determine the content of any notification of emergencies and initiate the notification system except in situations where responsible authorities determine such notification will compromise efforts to contain the situation and assist victims;
- Describe the process used to confirm a significant emergency, determine who to notify, determine the content of notification, and initiate the notification system;
- Titles of persons responsible for carrying out the emergency response plan;
- Procedures for disseminating emergency information to the larger community;
- Procedures to test the emergency response and evacuation procedures at least annually in accordance with the HEA requirements.

Specific Scenarios for which EOPs have been developed include Fire, Lockdowns, Severe Weather, Emergency Closings, Hazardous Materials Spills, and Pandemics among others.

The Communications plan includes Timely Notice and Missing Student Notification procedures in accordance with new requirements of the HEA of 2008.

Security and Access Policy

During business hours, the University (excluding certain housing facilities) will be open to students, parents, employees, contractors, guests, and invitees. During non business hours access to all facilities is by key or access media device, if issued. Access media for entry to a facility after normal business hours is granted to faculty, department heads, officers, and select staff members where job duties require such presence. In the case of periods of extended closing, the University will admit only those with photo-ID cards and access keys or media to all facilities.

The off-campus residence facility halls are secured 24 hours a day. Over extended breaks, the doors of all halls will be secured around the clock, and will be equipped with a lock separate from the regular key issued to resident students. Some facilities may have individual hours, which may vary at different times of the year. Emergencies may necessitate changes or alterations to any posted schedules.

Areas that are revealed through incident reports as problematic undergo security surveys to determine if security changes are required. Administrators from the Operations, Student Affairs, Provost's Office, Residence Life, and other concerned areas review these results. These surveys examine security issues such as landscaping, locks, alarms, lighting, and communications. Additionally, during the academic year, the Directors of Facilities Management, Residence Life, and Campus Safety meet regularly to discuss issues of pressing concern.

General Procedures for Reporting a Crime or Emergency

Community members, students, faculty, staff, and guests are encouraged to report all crimes and public safety related incidents to the University Public Safety Office in a timely manner, to ensure inclusion in the annual crime statistics and to aid in providing timely warning notices to the community, when appropriate.

To report a crime or an emergency on any campus, call the Facilities Management office at 999 which will connect you to that office at the campus you are attending, which will assist you after the crisis period has passed in completing a University Incident Report. Students may also contact the Student Affairs office if the situation should remain confidential, or the Human Resources Office if reporting an incident involving University personnel.

To report a non-emergency security or public safety related matter, call the Facilities Management office at 999 which will connect you to that office at the campus you are attending.

All incident reports are forwarded to the Executive Director of Student Affairs for review and potential action by the Office of Student Judicial Services in the case of students, or the Public Safety Office for all other activities. Investigators will be assigned to clarify a report when it is deemed appropriate. Additional information obtained via the investigation will also be forwarded to the original office to which the incident was reported.

If assistance is required from the local Police or Fire Department, please dial 911 to make an immediate request for assistance, followed by calling the Facilities office at the campus.

Missing Student Notification Policy and Procedures:

The purpose of this procedure is to establish protocols for the University in response to reports of missing students as required by the HEOA of 2008.

This procedure applies to all students who reside in the off-campus rental facility (Extended Stay, Skokie), primarily the PACE program students.

The definition of a 'missing' student is that the person's absence is contrary to his/her usual pattern of behavior and unusual circumstances may have caused the absence. Such circumstances can include but are not limited to a report that the student may be a victim of foul play, has expressed suicidal thoughts, is drug dependent, is in a life-threatening situation, or has been with persons' who may endanger the student.

All information gathered in this procedure will be accessible only to authorized campus officials, and disclosed only to law enforcement personnel in furtherance of an investigation.

Procedures for Student to Provide Notification Authorization:

- **Students 18 or above and emancipated minors:** In these cases, the student is given the opportunity each semester to designate an individual to be contacted by the University no more than 24 hours after the student is determined to be missing, and the designation will remain in effect until revoked or changed by the student.
- **Students under the age of 18 or not emancipated:** In these cases, the University is required to notify the custodial parent or guardian no more than 24 hours after the student is determined to be missing.

Notification Procedures:

Anyone who has information that a residential student may be missing must notify the Director of the PACE program immediately by calling 224 -233-2671. Others that may be contacted include any RA at the housing facility, or the Executive Director of Student Affairs at 312-261-3461.

These individuals will notify Legal Counsel (312-261-3935) and the Public Safety Office (847-209-1634).

The PACE Director and Public Safety Director will notify the Skokie Police Department of the report and request assistance if deemed necessary. Any legal notifications required under Illinois law will be followed.

Fire Safety Procedures, Statistics, Reports and Documentation:

In accordance with HEA requirements, National-Louis University has developed specific reporting procedures and processes for Fire Safety Reporting.

A Fire Log has been created and will be maintained in an accessible format available for review from all campus locations through designated staff.

Statistics on fire activity and safety will be reported in the annual Campus Safety & Security report.

Reports on scheduled fire drills and other related safety activity will be maintained by the Operational Services group, and annually reported to University leadership.

The University's Security Council will regularly review Fire safety, as well as general safety and security procedures and report to University Leadership on readiness and preparedness.

University Incident Reporting Logs:

National-Louis University maintains, in accordance with the HEA, incident reporting logs which are maintained by the Vice-President for Operations office, as follows. All logs are maintained on a shared drive within the University's virtual server network and are available during normal business hours for review with any requesting party.

Crime Statistics Log: All reportable crimes included here

Fire Safety Log: All fire safety incidents included here

General Incidents Log: All other NLU Incident reports included here (medical emergencies, non-reportable behavioral reports, etc.)

Access to the logs is established as follows:

Vice-President for Operations and designated reports	Full Access for data entry
Vice-President Finance/Administration	Read Access
Vice-President for Human Resources	Read Access
Legal Counsel	Read Access
Provost	Read Access
Office of Student Affairs	Read Access

Campus Contacts for Requests to View Logs	Read Access
Chicago	Brisbane Rouzan, Akbar Khan, Mario Rodriguez
Elgin	Don Velarde, Nancy Palermo
Lisle	Michael Cowan, Nora Velarde
North Shore	Jefferson Burns, Carl Pelott, Barbara Kite
Beloit	Robert Vance
Milwaukee	Robert Vance, Jennifer Peterson

TIMELY WARNINGS POLICY & PROCEDURE:

In the event that a situation arises, either on or off campus, that, in the judgment of the (Incident Commander), constitutes an ongoing or continuing threat, a campus or system wide "timely

warning” will be issued. The warning will be issued through the e-mail system to students, faculty, and staff by the Communications department.

Depending on the particular circumstances of the crime, especially in all situations that could pose an immediate threat to the community and individuals, the Communications Department may also post a notice on the web site at <http://www.nl.edu>.

Anyone with information warranting a timely warning should report the circumstances to the Vice-President for Operations, by phone at 847-209-1634 or by email at broberts@nl.edu. Because the intent of the warning is to enable members of the campus community to protect themselves, the warning should include all information that would promote safety.

The issuing of a timely warning is decided on a case-by-case basis in light of all the facts surrounding a crime, including factors such as the nature of the crime, the continuing danger to the campus community and the possible risk of compromising law enforcement efforts. The Emergency Management Team (or an ‘executive sub-group) will meet with appropriate personnel, and possibly with local and state law enforcement authorities, to discuss what is reasonable in terms of a timely reporting of a crime.

Sample Timely Notice Format

In compliance with the "Timely Notice" provisions of the federal Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act of 1998 the National-Louis University Public Safety Office is giving notice of a *(describe event fully)*.

REPORTED OFFENSE: *(describe offense and details as known – location, etc.)*

SUSPECTS: *(describe suspects if information available)*

DETAILS AS DETERMINED: *(Sample Message: “It can be assumed that conditions continue to exist that may pose a threat to members and guests of the community. It is the duty of the institution to warn of possible "dangerous conditions" on or near its campus, and at affiliate organizations off campus; an "affirmative duty" exists to warn persons associated with this university of possible peril at the hands of some third party or parties. Consider whether your presence at/ near this location while alone could place you in danger.”)*

Please forward this notice to your colleagues and post it on appropriate bulletin boards in your area. If you have any information that might be helpful in this investigation, contact the VP-Operations at 847-209-1634 or broberts@nl.edu.