



OLD DOMINION UNIVERSITY

University Policy

Policy #3012

SAFETY AND SECURITY POLICY

Responsible Oversight Executive: Vice President for Administration and Finance
Date of Current Revision or Creation: August 1, 2019

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, Code of Virginia Section 23.1-804, as amended](#), and the [Higher Education Act of 1965, as amended](#).

B. AUTHORITY

[Code of Virginia Section 23.1-1301, as amended](#), grants authority to the Board of Visitors to make rules and policies concerning 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.

[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](#)

[Code of Virginia Section 23.1-804, as amended](#)

[Virginia Department of Human Resource Management Policy 2.35 – Civility in the Workplace](#)

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

[University Policy 1021 – Emergency Management Policy](#)

[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.

Enterprise Risk Management (ERM) – A strategic business decision process that supports the achievement of an organization’s objectives by addressing the full spectrum of its risks and managing the combined impact of those risks as an interrelated risk portfolio.

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. It includes the incorporation of Enterprise Risk Management strategies to better ensure the University’s strategic goals and objectives are met.

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 who are paid through the University, 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 admitted to the University who have not completed a program of study for which they were enrolled; student status continues whether or not the University's programs are in session. Affiliated organizations are separate entities that exist for the benefit of the University through an operating agreement 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; (4) safeguard the University's property and physical assets; and (5) demonstrate commitment to compliance by assigning security and safety responsibilities to committees and departments.

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 Vice President for Administration and Finance 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 Vice President for Administration and Finance, 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, physical security technologies, emergency management, and other safety and security related efforts.

Specific Committee responsibilities include:

- i. 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;
 - ii. Overseeing reviews of the University's assessment of vulnerabilities, hazards and risks related to the safety and security of individuals and the physical campus;
 - iii. 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;
 - iv. Overseeing the education and prevention of violence at the University in accordance with [Code of Virginia Section 23.1-805, as amended](#), 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;
 - v. 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;
 - vi. Reviewing and establishing guidelines and standards for departmental emergency response and continuity of operations plans;
 - vii. Evaluating the effectiveness of the University's safety and security plans and programs; and
 - viii. Advising the Vice President for Administration and Finance 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 [Code of Virginia Section 23.1-805, as amended](#), 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 [Code of Virginia Section 23.1-805, as amended](#). 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. Executive Policy Group and Incident Management Team

The Executive Policy Group (EPG) provides strategic-level direction and guidance during a University incident, emergency, or event, and relies on the on-scene Incident Commander, Incident Management Team and/or functional units to implement the ODU Crisis and Emergency Operations Plan. The EPG consists of the Vice President for Student Engagement and Enrollment Services, Vice President for Administration and Finance, Provost and Vice President for Academic Affairs, Vice President for Human Resources, Assistant Vice President for Public Safety/Chief of Police, and ad hoc members as needed.

The Incident Management Team (IMT) provides operational-level coordination and support for University incidents, emergencies, and events. Guided by input from the Executive Policy Group, the IMT consists of representatives from the Emergency Support Functions (mission critical/key operations areas within the University) set forth in the ODU Crisis and Emergency Management Plan.

e. Health Safety Committee

The Health Safety Committee is a standing committee convened at the call of the Vice President for Administration and Finance 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.

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 has primary responsibility to respond to and investigate 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 Federal, State and local police departments. The University, through the ODUPD, 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. Offices of Emergency Management and Fire Prevention

The Office of Emergency Management (OEM) is responsible for coordinating all emergency preparedness and continuity planning, training, exercise, and outreach initiatives at the University. Guided by [University Policy 1021, Emergency Management Policy](#), and the Emergency Management Advisory Committee, OEM continually implements the emergency management cycle of prevention, mitigation, preparedness, response, and recovery through the facilitation of incident, emergency, and special event planning and management activities in coordination with ODUPD and other appropriate stakeholders. OEM also regularly collaborates with Hampton Roads-area municipal emergency management offices, as well as the Virginia Department of Emergency Management, the Federal Emergency Management Agency, and other local, State, Federal, non-governmental, and private sector partners.

The Office of Fire Prevention is responsible for facilitating fire and life safety inspections, training, education, and outreach for the University community; the Office also compiles fire safety data for the [Annual Security and Fire Safety Report](#).

c. Office of Strategic Communication and Marketing

The Office of Strategic Communication and Marketing (SCM) has shared responsibility for coordinating and disseminating University communications. Emergency communications from ODUPD are coordinated with SCM when time permits, and additional information regarding emergencies is prepared in cooperation with and disseminated by SCM after the event. SCM utilizes the ODU Alerts emergency notification system, University email, University website, University social media accounts, automated telephone alerts, emergency phone banks, computer alerts, texts, local media outlets, and other communications platforms to inform the University community.

d. Office of 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.

e. 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 University administrators, without the victim's permission, when there is a safety threat to the University community.

f. 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 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.

g. Office of Research

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

h. 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. The Student Health Services Director, in conjunction with the Medical Director and Clinical Supervisor as needed, works closely with the Office of Strategic Communication and Marketing staff to provide current information on health related-emergencies and recommends appropriate responses.

i. Counseling Services

Counseling Services provides mental health services to students . In addition to the immediate availability of crisis intervention 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.

j. 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.

k. University Audit Department

The University Audit Department 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 determine whether 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 the respective Vice President. The results are also communicated to the University President and the Audit Committee of the Board of Visitors.

l. Office of University Counsel

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

m. 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 [Jeanne Clery Act Disclosure of Campus Security Policy and Campus Crime Statistics Act](#) is a Federal statute requiring colleges and universities participating in Federal financial aid programs to maintain and disclose campus crime statistics and security information. 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, "timely warnings" will be provided to the community in the event that a situation arises within the Clery Act defined geographic area that, in the

judgment of the Assistant Vice President for Public Safety/Chief of Police or designee, constitutes an ongoing or serious threat. Emergency notifications will also be provided to the campus community (or a segment of the community), upon confirmation by ODUPD personnel, of a significant emergency or dangerous situation occurring on campus that involves immediate threat to the health or safety of students or employees. Section F2(c) of this policy describes the methods used to provide emergency notifications.

The Assistant Vice President for Public Safety/Chief of Police will be responsible for gathering and publishing the [Annual Security and Fire Safety Report](#) and maintaining the Daily Crime Log as required by the Clery Act. This report contains safety and security related policy statements, statistics (covering the last three reporting periods from January 1 to December 31) on criminal incidents occurring within the Clery defined geographic area, hate crimes as defined by the Clery Act, Violence Against Women Act crimes, as well as the number of arrests and judicial referrals for alcohol, drug, and weapons violations. Fire safety information and fire statistics related to residential facilities are also published. The Assistant Vice President for Public Safety/Chief of Police must also distribute electronically a notice of the report's availability to all current students and employees and make the report generally available to all prospective students and employees.

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 University 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 ODU Crisis and Emergency Management 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 Department 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's Office of Fire Prevention and reported to the ODUPD for inclusion in the Annual Security and Fire Safety Report and filing with the Department of Education.

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 ODU Public Safety/Security Technologies Services Unit for compliance with security requirements. The Security Technologies Services Unit 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 typically open to the public during operating hours and are secured after operating hours and during extended breaks.

5. Emergency Management Plans

Old Dominion University's emergency management plans and programs address prevention, mitigation, preparedness, response and recovery. The plans provide flexible organizational frameworks for incident/emergency/event management structures, emphasize preparedness, and identify interdependencies of functional areas and external partners.

G. RECORDS RETENTION

Applicable records must be retained and then destroyed in accordance with the [Commonwealth's Records Retention Schedules](#).

H. RESPONSIBLE OFFICERS

Dean of Students and Associate Vice President for Student Engagement & Enrollment Services
Assistant Vice President for Public Safety/Chief of Police
Associate University Counsel
Assistant Vice President for Strategic Communication and Marketing

I. 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 1005 – Discrimination Policy](#)
[University Policy 1020 – Closure of the University Due to Inclement Weather and Emergencies](#)
[University Policy 3200 – Use of Facilities and Grounds](#)
[University Policy 3223 – Environmental Health and Occupational Safety](#)
[University Policy 6603 - University Drug and Alcohol Policy](#)
[Terms and Conditions of the Housing and Dining Agreement](#)

