A federal law known as the Clery Act requires universities to annually compile and publish crime statistics for their campuses and certain other areas. This law requires that the university collect information about certain crimes from employees who are designated as “Campus Security Authorities” (CSAs). Although the name Campus Security Authority sounds like it refers to a security guard or police officer, under the Act any employee (including faculty) in a position of authority or with responsibilities relating to students is a Campus Security Authority.

You have been designated by your Dean, VP or other unit head as a Campus Security Authority (CSA). This message is notifying you of your CSA status and your reporting obligations under the university’s Crime Reporting Policy. It provides some explanation as to why and how you were designated as a CSA. This message also includes information about guidance available, and describes the relationship between your reporting obligations as a CSA and your Title IX reporting obligations.

As a CSA, you are required to report information about certain criminal conduct or attempted criminal conduct occurring – or alleged to have occurred – in certain locations. We call these locations our “Clery Act geography.” You are required to report to William & Mary Police so that (1) threats to the campus community may be investigated, if appropriate, and (2) W&M may disclose accurate information about the safety of our campus to current or prospective members of the W&M community.

The Clery Act crimes you must report are:
1. murder and manslaughter
2. robbery and burglary
3. aggravated assault
4. motor vehicle theft
5. arson
6. so-called “hate crimes” – (i) any other crime involving bodily injury, or (ii) larceny-theft, simple assault, intimidation, and destruction/damage/vandalism of property, when motivated by the perpetrator’s bias (a preformed negative opinion toward a group of persons based on their race, gender, religion, ethnic/national origin, disability, sexual orientation or gender identity)
7. sex offenses, not including sexual harassment or indecent exposure
8. domestic violence
9. dating violence
10. stalking.

These crimes are fully defined in Appendix A to the Crime Reporting Policy.

We designate CSAs following federal guidance. You were designated as a CSA because of the nature of your position, particularly your responsibility for student and campus activities and the level and type of interaction with students. Most full time, continuing faculty are CSAs. This is because of the status of faculty and the relationship between students and faculty.

The CSA designation is tied to your position – not your activities at any given time. This means that if you are on leave for a semester, for example, you are still a CSA.

What CSA reporting is – and is not. Reporting a Clery Act crime as a CSA is not about “turning someone in” or about making a report that a victim doesn’t want to be made. The main reason Clery Act crimes must be reported is so that W&M can accurately disclose crime statistics to students, employees, parents, and applicants. When W&M discloses
Clery incidents through its Annual Security Report, there is no personally identifiable information included – just numbers of reported crimes and geographic information. Except for sexual violence incidents, discussed below, you can report without identifying the victim if the victim doesn’t want the matter reported or has concerns about confidentiality or anonymity.

Sexual assaults must be reported by CSAs, but you can discharge this reporting obligation by disclosing the assault to the Title IX Coordinator using the Third Party Report Form. Under our Discrimination, Harassment, and Retaliation Policy, you are considered a “responsible employee” (a legal term of art). Responsible employees must report to me, as Title IX Coordinator, sexual assaults of W&M students. Responsible employees also must share with me information they become aware of regarding incidents of sexual violence occurring on our Clery Act geography. I share this information as needed with W&M Police, so you do not need to make a separate report to W&M Police. More information about reporting as a responsible employee is available under the “Faculty and Staff – Information and Reporting” tab of our sexual violence website, http://www.wm.edu/sites/sexualviolence/employee/index.php.

Additional guidance is available. Guidance about the Clery Act and CSA obligations is provided in FAQs, which include information about what triggers the reporting obligation. The FAQs also describe how you make a Clery Act report. In addition, the types of crimes and incidents that must be reported – Clery Act incidents – are defined fully in Appendix A to the Crime Reporting Policy. The Clery Act compliance resource website provides an overview of these and other related topics.

Thank you for your assistance in fulfilling these important federal requirements, and helping keep our campus safe.

If you have questions or concerns about this message, the Clery Act, or your role as a CSA, the Office of Compliance & Equity may be reached at 221-3146. The various resources hyperlinked (highlighted text) in this email may also be useful.

Kiersten Boyce
Chief Compliance Officer
http://www.wm.edu/offices/compliance/index.php