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In the event of any Clery Act crime occurring within the Clery geography of our UOPX locations which may pose a serious or ongoing threat to the UOPX community, the Clery Compliance Officer, with assistance from Corporate Security, the Security Operations Center (SOC), and designated Campus Safety Coordinators,

See Appendix A for the list of Clery Act crimes and Appendix B for Clery geography. Timely Warnings are specific to Clery Act crimes; therefore, non-Clery Campus Alert.

campus community of an incident and to provide information that may enable community members to better protect themselves from similar incidents.

Criteria for Issuing a Timely Warning

The UOPX <u>Clery Compliance Officer</u>, with assistance from designated <u>Campus Safety Coordinators</u>, will issue a Timely Warning whenever the following criteria are met:

- 1) A Clery Act crime is reported to a Campus Security Authority (CSA) or local law enforcement,
- 2) The crime occurred in a Clery reportable location,
- 3) The perpetrator has not been apprehended, and
- 4) There is a serious or ongoing threat to the campus community because of this crime.

It is important to note that the Clery Compliance Officer is not required to issue a Timely Warning for *every* crime reported but must, at a minimum, follow Clery Act guidelines. When making their decision, they may consult with local law enforcement. The decision to issue a Timely Warning shall be made on a case-by-case basis in conjunction with all the facts surrounding the crime(s), including the nature of the crime and the continuing danger to the campus community while considering the following questions:

Was the suspect identified?

Was the suspect apprehended?

Did the incident involve physical violence?

Has the suspect threatened to commit physical violence?

Did the incident involve multiple victims?

Does it appear to be an isolated incident involving a specifically targeted victim?

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personnel are available 24/7/365. The SOC also works with appropriate local police agencies to ensure these agencies inform UOPX when they learn of a reported incident which may necessitate a Timely Warning. In the event of an emergency, always call 9-1-1 first.

The Clery Compliance Officer, with assistance from Corporate Security, the SOC, and designated Campus Safety Coordinators,

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including protocols for emergency notifications in those situations that represent a significant emergency or dangerous situation affecting the health and/or safety of the campus community where UOPX will issue an emergency notification without delay, unless issuing a notification would compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency. Our response to an emergency is designed to ensure there is an expeditious and effective reaction in the event of a significant emergency or dangerous situation occurring at a UOPX location involving an immediate threat to the health or safety of members of the campus community. Dangerous situations may not be directly on a campus, but rather that the situation presents a danger to a campus. Such situations include, but are not limited to, fire/smoke/explosion, severe weather, hazardous material, earthquake/power outage, active shooter, disease outbreaks, bomb threats, etc. UOPX has communicated with local police requesting their cooperation in informing us about situations reported to them that may warrant an emergency response to our campus community.

Emergency Response Procedures

In the event a significant emergency or dangerous situation occurs, the Security Operations Center (SOC) in conjunction with UOPX Corporate Security (when possible) will 1) confirm the existence of a significant emergency or dangerous situation, 2) determine the appropriate segment(s) of the campus community to notify, 3) determine the content of the emergency notification, and 4) initiate the emergency notification system.

Confirming the Existence of a Significant Emergency or Dangerous Situation

The SOC or Corporate Security may become aware of a critical incident or other emergency situation that potentially affects the health and/or safety of the campus community. Generally, the SOC and Corporate Security become aware of these situations when they are reported by other campus personnel, or upon discovery during patrol or other assignments. Some emergencies may be reported through outside sources, for example infectious diseases through the Centers for Disease Control and Prevention (CDC).

By calling (866) 992-3301 or through emergency/panic alarms installed at some locations, the SOC may be notified of significant emergencies by any member of the campus community including students, faculty, staff, or visitors. These notices are issued when the SOC confirms with UOPX Corporate Security, the local campus director, the designated Campus Safety Coordinator, local authorities, or verified media source that there is a significant emergency or a dangerous situation involving an immediate threat to the health or safety of members of the UOPX community. The process used to confirm the existence of a significant emergency or dangerous situation involves multiple layers of information gathering and multiple people and departments. While confirmation does not necessarily mean all pertinent details are known or available, confirmation does include when internal individuals (i.e., local campus director and/or Campus Safety Coordinator), internal departments (i.e., Corporate Security and SOC), and external sources (i.e., local authorities and/or verified media sources) have verified a legitimate emergency or dangerous situation exists. The processes for confirming such situations are coordinated by Corporate Security, the SOC, and, if necessary, the Crisis Management





- Phone trees
- Other media releases

If UOPX activates its emergency notification system in response to a situation that poses an immediate threat to members of the campus community, several offices at UOPX are responsible for notifying the larger community, if warranted, such as the Public Relations Department and the Social Media Team, about the situation and steps UOPX has taken to address the emergency. Primarily, the Public Relations Department is responsible for crisis communications and for maintaining communications with national, regional, and local news outlets.

The authorized representatives at UOPX to initiate all or some portions of the emergency notification system in an emergency, urgent, or important situation include individuals in the following areas:

Corporate Security

Security Operations Center (SOC)

Crisis Management Team

Depending on the severity of the incident, the SOC has the authority to send an emergency notification. If the incident is a large-scale emergency, as determined by the SOC supervisor or a member of Corporate Security, that individual will be responsible for making decisions regarding the emergency notification.

If, in the professional judgment of the Corporate Security Team and/or Crisis Management Team, issuing a notification potentially compromises efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency, UOPX may elect to delay issuing an emergency notification. As soon as the condition that may compromise efforts is no longer present, UOPX will issue the emergency notification to the campus community or applicable segment of the campus community.

Determining Appropriate Segment(s) of Campus Community for Notification

Guard services contracted by UOPX or local first responders on the scene of a critical incident or dangerous situation will assist those preparing the emergency notification with determining what segment or segments of the campus community should receive t

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aware of the situation, and that they know the steps to take to safeguard their personal and community safety.

UOPX generally employs a three-step emergency notification process where the initial notification alerts the campus community, the second notification provides a status update (if applicable), and the final notification provides reassurance and/or release from the emergency. The emergency mass notification message content guidelines for emergency or urgent situations includes:

1)



Corporate Security and the Clery Compliance Officer is responsible for maintaining policies and procedures related to the Emergency Mass Notification (EMN) processes. These processes, policies, and procedures include the following elements:

Establishing and communicating processes to report potential issues to the SOC and the Crisis Management Team for its review and consideration

Creating and implementing campus community training regarding the emergency notification process including:

- o Determining how potential issues should be reported
- Maintenance of emergency contact information
- o Appropriate response procedures when the emergency notification system is used
- o Developing and maintaining overlapping and redundant backup systems to support

Providing written procedures used by the SOC and Crisis Management Team to administer the emergencyhenq0 g1 RG.98 Tf1 0 0 1 108.02 550.72 Tm0.137 0i mnBTMC / q3.92l 0.16Artif1 0 0 112 792 re

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There are circumstances for issuance of a notice that is broader than the minimum Clery Act requirements of a Timely Warning or Emergency Mass Notification (EMN), and UOPX will issue a Campus Alert when deemed appropriate. For example, the Security Operations Center (SOC), Corporate Security Department, Clery Compliance Officer, or Campus Safety Coordinator may choose to issue a Campus Alert via phone, email, text, or push notification (via the Phoenix Safe app) to notify the campus community of a situation. The content of a Campus Alert may vary depending on the type of incident reported, circumstance, and the location of the occurrence.

Examples of a Campus Alert include location closings or delayed openings, significant systems/network outages, recurring non-Clery Act crimes, or other important information that must be disseminated to the University or segments of its population quickly. The decision to close or modify the operating hours of a location is at the discretion of the campus director, senior management, or their designee. All closings or delayed opening decisions must be reported to the SOC as soon as possible. The SOC will then send a campus alert to the appropriate recipients according to the impacted location. The content of these notifications will follow templates developed by the SOC. Alerts regarding location closings or delayed openings will only be sent dmcaw of 7:00the





Appendix C: Timely Warning Matrix

Date/time of incident (per reporting party): on XX/XX/20XX at XX:XX	
Date/time incident reported to CSA: on XX/XX/20XX at XX:XX	
ls it a Clery Act crime? Yes □ No □	
If yes, proceed. If no, review for possible Emergency Notification or Campus Alert.	
Type of Clery Act crime:	
Location of crime:	
On Clery geography? Yes □ No □	
Factors to consider when determining a serious a continuing threat to the campus community:	
a. Is the suspect(s) identified? Yes \square No \square	
b. Are there multiple suspects? Yes \square No \square	
c. The suspect(s) is a: Student □	

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Appendix D: Glossary

Alert A signal or messaging technique used to warn of danger, attack, or other emergency situation. A condition or period of heightened watchfulness or preparation for action.

Campus Is defined in 34 C.F.R. § 668.46 as:

Any building or property owned or controlled by an institution within the same reasonably contiguous area and used by the institution in direct support of, or in a manner related to, the

Any building or property that is within or reasonably contiguous to the area identified above 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).

Campus Security Authority (CSA) Is defined in 34 C.F.R. § 668.46 as:

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 under paragraph (i) of this definition, such as an individual who is responsible for monitoring 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.

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