



culinaryarts.edu
1212 South Broad Street
215.468.8800

Campus Security Policy Statement

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, more commonly known as the Clery Act, is contained (along with other security-related disclosure requirements) in section 485 of the Higher Education Act, codified at 20 U.S.C. § 1092. It requires all postsecondary education schools to keep records and report annually on the nature, date, time, and place of crimes occurring on campus, including hate crimes. It also prescribes a number of security-related protocols for emergency response procedures, timely notifications for on-campus crimes, etc.

A copy of JNA Institute’s Annual Campus Safety and Security Report (also known as the Annual Security Report, or ASR) is available from the School. This report is distributed in compliance with the Clery Act. **The ASR and Drug and Alcohol and Abuse Prevention programs information is available online at www.CulinaryArts.edu/Clery.**

JNA Institute’s commitment to safety and security includes:

- Providing a secure and crime free environment for students and employees;
- Performing regular evaluation of security programs;
- Monitoring and following up on each crime reported at property owned or controlled by JNA Institute.

We believe student and employee behavior, which promotes security awareness, is important in all aspects of our lives and we encourage all students, faculty and staff to accept responsibility for their own security as well as the security of other members of the JNA Institute (the “School”) community.

As you read the following document, please address all questions or concerns to the School’s Campus Security Authority (CSA):

- Nicole DiGironimo, 215-468-8800, director@jna.edu

JURISDICTION AND OTHER DEFINITIONS FROM THE CLERY ACT

The Clery Act requires the School to disclose crime statistics that occur on three types of property: campus, non-campus buildings or property, and public property areas.

- **“Campus”** is defined as buildings or property owned or controlled by the School within the same reasonably contiguous geographic area and used by the School in a manner related to the School’s educational purpose. It also includes property in that contiguous area owned by the School but controlled by another person, if that property is used by students and supports School purposes (e.g. a food or retail vendor). Branch campuses and geographically disconnected administrative divisions or schools would be considered separate campuses for the purposes of reporting.
- A **“non-campus building or property”** is one that is owned or controlled by a school recognized student organization, or one that is owned or controlled by the School and used by students or by the School for education-related purposes and that is not within the same reasonably contiguous geographic area of the campus. Crimes occurring on “non-campus property” must be reported. However, incidents occurring on public property adjacent to “non-campus buildings or property” do not have to be included. JNA Institute of Culinary

Arts does not have such property in this category for which we must report.

- **“Public property”** is property that is located within the same reasonably contiguous geographic areas of the campus, like a sidewalk, street or public parking lot, that is adjacent to a facility owned or controlled by the School for purposes related to the School’s educational purposes. Crimes occurring on “public property” must also be reported in the crime statistics.
- The term **“crime of violence”** means— (a) an offense that has as an element of the use, attempted use, or threatened use of physical force against the person or property of another, or (b) any other offense that is a felony and that, by its nature, involves a substantial risk that physical force against the person or property of another may be used in the course of committing the offense.
- **“Credible threat”** means a verbal or nonverbal threat, or a combination of the two, including threats delivered by electronic communication or implied by a pattern of conduct, which places the person who is the target of the threat in reasonable fear for his or her safety, or the safety of his or her family members or individuals closely associated with the person, and which is made with the apparent ability to carry out the threat to cause such harm. It is not necessary to prove that the person making the threat had the intent to actually carry out the threat. The present incarceration of the person making the threat is not a bar to prosecution under this section.
- **“Cyber stalk” or “Cyberbully”** means to engage in a course of conduct to communicate, or to cause to be communicated, words, images, or language by or through the use of electronic mail or electronic communication, directed at a specific person, causing substantial emotional distress to that person and serving no legitimate purpose. A person who willfully, maliciously, and repeatedly follows, harasses, or cyber stalks another person commits the offense of stalking, a misdemeanor of the first degree, punishable as provided in PA Criminal Code. A person who willfully, maliciously, and repeatedly follows, harasses, or cyber stalks another person and makes a credible threat to that person commits the offense of aggravated stalking, a felony of the third degree, punishable as provided in PA Criminal Code.
- **Bystander Intervention.** A bystander is someone other than the victim who is present when an act of dating violence, domestic violence, stalking, or sexual assault is occurring or when a situation is occurring in which a reasonable person feels as though some protective action is required to prevent sexual assault, dating violence, domestic violence, or stalking. Bystanders, if active, can prevent harm or intervene before a situation gets worse.

REPORTING CRIMINAL ACTIONS

Students and employees are cautioned never to attempt to apprehend or pursue a suspected criminal. **In an emergency, dial 911.**

Students and employees who wish to report criminal actions, should immediately contact the CSA or other responsible School personnel.

If someone wishes to make an anonymous report, they can do so via the Student Services area of the School’s LMS or at: www.CulinaryArts.edu/Clery

JNA Institute of Culinary Arts is a non-residential school and does not have a campus police force. Therefore, all crimes must be reported to local law enforcement authorities for assistance and/or investigation. Local law enforcement will allow a victim or witness to report crime on a voluntary and confidential basis.

In the event the victim is unable to make such a report, the CSA or third-party witness is encouraged to report the crime promptly. A written report should be filed as soon as possible with the CSA, who will follow up on the report personally or assign responsibility to another appropriate administrator to follow up and report on the outcome, as well as any preventative or other actions taken to ensure the safety and security of all students and employees.

WHEN TO REPORT CRIMES ON CAMPUS

Immediately report any crimes or suspicious activity at the School to the CSA or other School personnel near you.

If you have any doubts about whether to report something that has occurred, report it. Victims of, or witnesses to, crimes may disclose them on a voluntary, confidential basis to the director, which can then determine whether the event constitutes a crime that must be collected and statistically reported. Your cooperation in timely reporting assists the School in issuing equally timely warnings to the campus community. All crimes must be reported immediately.

If someone wishes to make an anonymous report, they can do so via the Student Services area of the School's LMS or at: www.CulinaryArts.edu/Clery

SCHOOL SAFETY TIPS

Crime is a serious problem with no easy solutions. Therefore, all members of the School community are encouraged to assist one another by taking responsibility for personal safety and assisting with the security needs of others. While School security measures may help regarding safety and security concerns, ultimately the primary responsibility for your personal safety rests with you.

SAFETY TIPS

- Stay alert of your surroundings, wherever you are.
- If you feel uncomfortable in a place, leave right away.
- Keep eyes and ears open, hands free.
- Choose busy streets and avoid going through deserted areas.
- At night, walk in well-lit areas whenever possible.
- Try not to walk or jog alone. Take a friend or walk in group.
- Avoid carrying large sums of cash.
- When in public spaces, keep valuable items including jewelry, mobile phones and wallets out of sight.
- Carry a pepper or mace spray as a precautionary measure.
- Avoid returning to campus after dark or walk in groups to and from buildings.
- Communicate suspicious behavior immediately to a staff or faculty.

Always use your eyes, ears, and telephone to keep School officials advised of what you see and hear. Call the School at (215) 468-8800 when you see:

- Strangers loitering in office areas, hallways, classrooms, or lounge areas, etc.;
- Unsecured doors or windows in the school building that are supposed to be locked;
- Persons publicly displaying a weapon;
- Suspicious persons carrying articles, equipment, luggage, or other packages out of the school building.

CAMPUS SECURITY AND ACCESS TO CAMPUS FACILITIES

JNA Institute of Culinary Arts is a non-residential School and does not have a campus police force. Therefore, all crimes are reported to local authorities as described in the first section regarding policies and procedures to report crimes. All crimes should be reported immediately to enhance the opportunity for a quick resolution.

The security of the educational and work environment is a high priority at JNA Institute of Culinary Arts. However, the building is a shared space and JNA does not control access to the buildings outside of the School's business hours. During normal business hours and hours in which the building is accessible, visitors (including vendors, etc.) are required to sign in at the lobby.

PREPARING THE ANNUAL DISCLOSURE

The CSA has the responsibility of gathering the data used to prepare the annual campus crime statistics report. Campus crime data is gathered the same day that it is reported. The data is obtained from reports made to local law enforcement. Crimes are counted in the disclosure based upon the crime having been reported, not whether there was a conviction. The resulting data is used to prepare the annual crime statistics report.

In very limited circumstances, the School may remove from its crime statistics (but not from its crime log) reports of crimes that have been determined to be "unfounded" by law enforcement officials. JNA Institute of Culinary Arts will report to the Department and disclose in the annual security report statistics of the number of crime reports that were "unfounded" and subsequently withheld from its crime statistics during each of the three most recent calendar years.

The ASR is published and distributed by October 1 of each year to current students and employees. A notice of the ASR's availability is also provided to prospective students and employees, with a notice that a paper copy is available upon request. **The ASR is available online at www.CulinaryArts.edu/Clery.**

REPORTABLE OFFENSES UNDER THE CLERY ACT

The Clery Act requires reporting on the following offenses:

- murder;
- manslaughter (negligent and non-negligent);
- sex offenses, forcible and non-forcible;
- robbery;
- aggravated assault;
- burglary;
- motor vehicle theft;
- arson;
- arrests, or persons referred for campus disciplinary action for liquor law violations;
- arrests, or persons referred for campus disciplinary action for drug-related violations;
- dating violence, domestic violence, sexual assault, and stalking (DVSAS)**
- arrests, or persons referred for campus disciplinary action for weapons possession, carrying, etc., and
- hate crimes, [which for Clery Act purposes include any crime listed in the preceding points, as well as: larceny-theft; simple assault; intimidation; and destruction, damage, or vandalism of property in which the victim is intentionally selected because of his or her actual or perceived race, gender, religion, sexual orientation, ethnicity, national origin, or disability.]

** To read up to date information regarding the Violence Against Women Act (VAWA), please see: <https://nnedv.org/content/violence-against-women-act/>

TIMELY CAMPUS WARNINGS OR ALERTS

A timely warning to the campus community is distributed regarding any of the above listed crimes (see Reportable Offenses under the Clery Act), which are deemed to represent a threat to the students and employees, and which are reported to campus officials or to local police agencies. The campus crime alert is issued in a manner that is timely and

will aid in the prevention of similar crimes.

The manner of dissemination to alert the campus community may include one or more of the following methods: e-mail, voice mail, and text messages or smart phone notifications. In addition, the CSA or other campus officials will post relevant warnings, updates and advisories on its social media Web page. Campus officials may decide to issue an alert about a crime occurring off-campus but in a location frequented by students, even though such a crime would not be included in the annual report.

- **Crime Alerts** – Crime Alerts are published when a crime occurs on or near the school that potentially threatens the school community. The crime alerts are distributed in a variety of methods, depending upon the incident.

A STATEMENT OF PROGRAMS AND RESOURCES AVAILABLE TO STUDENTS AND EMPLOYEES RELATED TO CAMPUS SECURITY, PERSONAL SAFETY, AND CRIME PREVENTION

JNA Institute provides information on personal safety and crime prevention. Educational programming consists of primary prevention and awareness programs for all incoming students and new employees and ongoing awareness and prevention campaigns for students and employees.

Additionally, the school office has a directory of services that are available, within the community, to assist those who have suffered from a criminal act. These services are usually free and are provided by organizations or agencies within the community. The office also has available resource materials that address Domestic Violence, Dating Violence, Sexual Assault and Stalking.

CAMPUS SAFETY EDUCATION PROGRAMS AND RESOURCES

Policies and guidance from Federal, State, and other regulatory groups often change. Knowing this, the School intends to maintain a consistent and thorough campus safety program that meets or exceeds current regulations. This will include biannual education programs and access to relevant resources.

As of 2023, the education program for all students and employees must include:

- A discussion of sexual violence, dating violence, domestic violence, and stalking education prevention and response (previously, Article XX-G only required schools to establish a sexual violence awareness educational program)
- A discussion of consent, including an explanation that the victim is not at fault
- A discussion of drug and alcohol-facilitated sexual violence
- Information relating to risk education and personal protection
- Information on where and how to get assistance, including the importance of medical treatment and evidence collection, and how to report sexual violence to campus authorities and local law enforcement
- A discussion of the possibility of pregnancy and transmission of sexual diseases
- Introduction of members of the educational community from campus police or security and local law enforcement; campus health center, women's center, and rape crisis center; and campus counseling service or any service responsible for psychological counseling and student affairs
- A promise of discretion and dignity
- A promise of confidentiality for victims of sexual assault to the extent allowable by law
- Information regarding confidential resources and services available for victims of sexual violence, dating violence, domestic violence, and stalking

As part of the Schools compliance with this and future requirements for an education program that address the

Last Updated: January 2023

specified areas above, the School has several relevant brochures available on display in the building, which students and employees have access to. These brochures are from nationally recognized organizations and include awareness and preventive information.

A STATEMENT ADVISING OF AVAILABILITY OF INFORMATION ON REGISTERED SEX OFFENDERS

The Federal Campus Sex Crimes Prevention Act that became effective October 27, 2002 requires eligible Schools participating in the Title IV Federal Student Aid programs to issue a statement advising the campus community where the State law enforcement agency information concerning registered sex offenders/predators may be obtained.

Sex offenders are required to be registered according to the State law in the State in which they reside and are also required to notify appropriate State officials of each postsecondary school at which the offender is employed or is a student. Any such offender is also required to give notice to the appropriate State authorities of any changes in enrollment or employment status at the postsecondary school.

In the Commonwealth of Pennsylvania, information concerning registered sex offenders and predators may be obtained from:

PA State Police Megan's Law
1800 Elmerton Avenue
Harrisburg, PA 17110
1.866.771.3170
www.pameganslaw.state.pa.us

Information is also available in the United States Department of Justice national sex offender registry at <http://www.nsopw.gov/Core/Portal.aspx>