



Policy Title: **Campus Threat Assessment**

Policy Number: PS 8

Purpose of Policy: To create a policy statement that outlines Bellevue University's Threat Assessment Team to assess and respond to safety threats on campus.

Applies to: Students, faculty, staff, 3rd party vendors, and campus guests

Policy Statement:

The Threat Assessment Team and all associated policies have been established to assess potentially violent behavior or violent threats by students, faculty, staff or nonaffiliated people on campus.

Bellevue University is committed to maintaining a campus and workplace environment that is safe and secure for all students, staff, faculty, and visitors. Bellevue University believes that the best ways to learn of and prevent a possible threat is through extensive communication between all members of the campus community.

Bellevue University's goal is to get a troubled individual the resources and support he or she needs to be successful, and in some cases, to make an informed assessment of his or her behavior. As part of this goal, Bellevue University has established a Threat Assessment Team which is empowered to assess risk and, in cooperation with other University teams or offices as appropriate, formulate an appropriate response in situations where an individual's behavior and/or statements generate concern that he or she may present a threat to the health or safety of others. The Threat Assessment Team seeks to mitigate potential risks before they result in harm.

If there is a significant credible threat to the campus or a portion of the campus, legal and protective measures may be taken and information can be shared with the campus regarding the threat and possible crime prevention steps.

The Federal Educational Rights and Privacy Act (FERPA), which covers student educational records, does not extend to observable behavior a student may display in class or elsewhere and should not be an impediment to coordination among instructors, administrators and police.

FORMATION OF THE THREAT ASSESSMENT TEAM:

The Threat Assessment Team consists of the following members:

- Chief Security Officer (Team Chair)
- Dean of Students
- Disabilities Counselor or Director

- Human Resources Director (as needed, in cases of employee involvement)
- University Legal Counsel
- Title IX Coordinator (at initial triage only, to determine if concern is Title IX)
- Dean of one of the Colleges (if needed, on a rotating basis)
- Representative for mental health services (consultation only, if needed)
- Others identified by the Threat Assessment Team, as appropriate

All members of the team will go through appropriate training in threat assessment protocols and will attend training and professional development as needed. Members of the Threat Assessment Team will keep all records kept in the course of threat assessment procedures confidential and secure.

PURPOSE/ACTIVITIES OF THE TREAT ASSESSMENT TEAM:

As appropriate to the circumstances of a particular situation, the Threat Assessment and Management team may engage in activities that may include, but are not limited to, the following:

- receiving reports and gathering and analyzing information regarding acts of violence, behavior of concern or statements and/or potential threats posed by individual(s);
- developing, implementing, and monitoring intervention strategies and management plans, with or without the involvement of other University teams or offices as appropriate, that are designed to respond appropriately to statements, behavior and/or circumstances that generate concern that an individual may pose a risk of harm to him-/her-self or a member of the campus community, including but not limited to, incidents of violence, threatening behavior or statements, unwanted pursuit, stalking, and harassment, both residentially and as online behavior;
- coordinating with appropriate authorities, including law enforcement, medical personnel, and other outside agencies, as appropriate;
- implementing reporting protocols and developing strategies to encourage reports from the campus community;
- assisting in conducting periodic campus-wide awareness education for students, staff, and faculty regarding threat assessment, threat management, pertinent information-sharing issues, and the Threat Assessment Team's responsibilities. Such training and education will be coordinated with other departments such as the Department of Campus Safety, Human Resources, Office of Academic Affairs, Dean of the Colleges, and
- keeping apprised of best practices and participating in periodic trainings in threat assessment and management

REPORTING POTENTIAL THREATS:

All students, faculty and staff should be committed to ensuring the safety and security of the campus and workplace environment. As such, anyone who believes that an individual has committed or may commit an act of violence, is engaging in behavior or making statements that generate concern about the potential for violence, or otherwise may pose a threat to the health or safety of any member of the campus community should report such behaviors.

Bellevue University has numerous reporting mechanisms in place on campus for identifying and reporting threatening behavior and concerns.

Immediate Danger

- Call 911 and, if time and safety permits, 557-5000 (Campus Security)

Acts or immediate threats of violence must be reported immediately. This reporting applies to all staff, faculty and students. Examples of imminent threats or danger include:

- Brandishing guns, firearms or other weapons
- Suicide threats or recent attempts at suicide
- Physical threats or aggression toward another person
- Severe rage and verbal threats to kill or harm someone
- Possession of drugs or alcohol or under the influence of drugs or alcohol.

Threats or concerns that are troubling but do not require an immediate response:

- Contact Threat Assessment Team by completing an Incident Report. That report will be routed to the appropriate personnel who will make a decision regarding the need to convene the Threat Assessment Team.

All threats of violence or intimidation should be reported to the Threat Assessment Team from all members of the campus community. Examples of threatening behavior or incidents that should be referred to the Threat Assessment Team include:

- Evidence of suicidal thoughts expressed through writing, papers, conversations or online postings
- Angry outbursts or intense and abnormal response to events
- Preoccupation with violent themes, death or destruction
- Stalking behaviors
- Evidence of hopelessness or despair
- Threats or inappropriate emails
- References to harming others or planning a violent event

POTENTIAL ACTIONS TAKEN BY THE THREAT ASSESSMENT TEAM:

The following are potential Threat Assessment Team activities intended to provide insight into some of the options that may, among other strategies, be utilized by the Threat Assessment Team when it is assessing and managing potential threats. However, The Threat Assessment Team will assess and manage each situation on a case by case basis, in accordance with its best judgment and other applicable University policies, and any of the potential activities listed below may or may not be engaged in, depending on the circumstances of a particular situation.

- The Campus Safety Office and/or other law enforcement agencies will usually coordinate all action in cases of a violent incident or imminent threat of violence on campus.
- Once information of concern is received by the Threat Assessment Team, the information will be evaluated and, if appropriate, representatives from the team will be convened (based on the persons involved and team member availability).
- The Threat Assessment Team, or the Team's Chair or designee, in coordination with Campus Safety Office and the Crisis Management Team, will first determine whether there is an imminent threat of harm or other emergency situation that requires immediate intervention. If so, the Threat Assessment Team, Chair or designee may notify law enforcement, seek the assistance of Public Safety, seek emergency medical assistance, or

take other appropriate measures to address the imminent threat or situation. If not, the Team or some portion of the Team will usually conduct an initial screening to determine whether a full inquiry is warranted.

- If the Threat Assessment Team determines that there does not appear to be an emergency or imminent threat of harm, but that a full inquiry is warranted, the Team will conduct a full inquiry to determine whether the person or situation of concern may pose a threat of violence or other harm. As part of its inquiry, the Team may obtain information from multiple sources including, but not limited to, faculty, student affairs staff, coaches, family members, or others who may have relevant knowledge or information. Campus community members are encouraged to cooperate fully with and provide information to the Team.
- The Threat Assessment Team will evaluate the information obtained in the course of the inquiry to determine whether the person or situation in question appears to pose a threat of violence or other harm.
- If the Threat Assessment Team determines that the person or situation poses a threat of violence or other harm, it usually will then develop, implement, monitor, and document a management plan designed to intervene and reduce the risk of harm that may be posed by the individual. The management plan may include, but is not limited to, the following (as circumstances and resources may dictate): family/parental notification; law enforcement intervention; disciplinary review and action; a behavioral contract, voluntary referral for mental health evaluation or treatment; mandated psychological assessment or other medical treatment; voluntary or involuntary withdrawal or suspension from the University; expulsion or dismissal of a person of concern; modification of the environment or other reasonable accommodations to mitigate risk; collaboration with the identified alleged target(s) to decrease vulnerability; engaging with the person of concern to de-escalate the situation; and ongoing monitoring.
- If the Threat Assessment Team determines that the person of concern does not pose a threat, the Team may take no action or may opt to monitor the person or situation for a period of time and re-evaluate the case, as necessary.
- Cases handled by the Threat Assessment Team will generally remain open until it appears that a management plan is no longer necessary.

CONFIDENTIALITY

All reports under this policy will be handled in a sensitive manner. Information will be shared with others only to the extent necessary to assess and manage the situation and in accordance with state and federal law.

Bellevue University is also part of a larger community and context. If there is an independent investigation or lawsuit relating to an act of violence or a potential threat, those involved or others may be required by law to provide documents, testimony, or other information.

RETALIATION

Retaliating directly or indirectly against a person who has in good faith made a report under this policy or who has supported or participated in an investigation is prohibited. Retaliation includes but is not limited to ostracizing the person, pressuring the person to drop the report or not participate in the investigation, or to provide false or misleading information, or engaging in conduct that may reasonably be perceived to affect adversely that person's educational or work

environment. Depending on the circumstances, retaliation may be unlawful, whether or not the report is ultimately found to have merit. An individual who engages in retaliation under this policy may be subject to discipline in accordance with the Bellevue University policy.

Procedures	Bellevue University Threat Assessment Procedures
Supporting Documentation:	Bellevue University Threat Assessment Procedures; Bellevue University Threat Assessment Flowchart ; Bellevue University Manual; NaBITA Threat Assessment Tool; Faculty and Staff Action Guide
Keywords:	threat, assessment, retaliation, confidentiality, evaluation, campus safety, violence, intimidation
Responsible Office:	Center for Health and Safety
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Approved by:	Mary Hawkins
Effective Date:	November 1, 2017
Review Cycle and Dates:	This policy is new and will be reviewed annually.

APPROVED:

/signed/
Dr. Mary Hawkins, Bellevue University President

10/16/2017
Date