

Review of Current UNC Safety Policies for the UNC Campus Safety Commission

Prepared by the UNC-Chapel Hill Office of Ethics and Policy

July 10, 2019

Executive Summary

- This report surveys current UNC-Chapel Hill policies related to “campus safety” in support of the newly appointed Campus Safety Committee.
- This report addresses physical, mental, and emotional safety. The report does not address purely electronic threats such as hacking.
- This report is organized into two main categories - policies that are designed to *prevent* incidents and policies designed to *respond* to incidents. The policies are further organized by what they most directly impact: people, finances, and infrastructure. Finally, policies affecting people are further organized by who is affected: students, faculty and staff, or everyone.
- Key policy gaps remain in several safety-related areas, including 3-D printed weapons and weapon parts, foreign influence in research, food insecurity, and, most notably, lack of transparency into UNC Police (UNC PD) Policies and Procedures.
- Recommendations for the UNC-Chapel Hill Campus Safety Committee to consider include:
 1. Explicitly State Underlying Assumptions About Campus Safety;
 2. Make UNC PD Policies and Procedures Publicly Accessible;
 3. Have UNC PD Engage in More “Community Policing;” and
 4. Commit to Making the UNC Campus Safety Commission Recommendations Public.

Introduction

On May 1, 2019, Interim Chancellor Guskiewicz charged the UNC-Chapel Hill Campus Safety Commission with the following mission¹:

- Assess the campus climate and culture around campus safety;
- Provide vision and guidance to the University in the delivery of campus safety services;
- Engage in communication and develop a mutual understanding of roles and expectations between the community and UNC Policy; and
- Serve as a conduit for relaying information and concerns about campus policing policies, practices and related actions to the University administration and UNC PD.

This report serves as background research and analysis of current Policies and Procedures related to “campus safety” that are currently in place at UNC-Chapel Hill (“the University”). The goal of this research is to help inform the debate of the Campus Safety Commission as it works towards achieving its mission.

Defining “Safety”

This report uses the Merriam-Webster definition for the word “safety,” which it defines as “the condition of being safe from undergoing or causing hurt, injury, or loss.”²

Scope

This report only deals with threats to physical (including mental and emotional) safety. This report recognizes that electronic threats, such as cyberbullying, hacking of the University network, emerging technologies such as 5th Generation wireless networks (“5G”), and the electronic theft of Intellectual Property, are serious and continue to grow.³ However, for the purposes of this report, any discussion of electronic or Internet-related resources is in the context of physical safety.

¹ Interim Chancellor Guskiewicz, *Charge to the Campus Safety Commission*, n.d.

² Merriam-Webster, “safety,” n.d., <https://www.merriam-webster.com/dictionary/safety>.

³ For example, see Federal Bureau of Investigation, *Higher Education and National Security: The Targeting of Sensitive, Proprietary and Classified Information on Campuses of Higher Education*, April 2011, <https://www.fbi.gov/file-repository/higher-education-national-security.pdf> and Dustin Volz, “Chinese Hackers Target Universities in Pursuit of Maritime Military Secrets,” *The Wall Street Journal*, March 5, 2019, <https://www.wsj.com/articles/chinese-hackers-target-universities-in-pursuit-of-maritime-military-secrets-11551781800>.

Current UNC-Chapel Hill Policies

This report separates existing University “safety” policies into two categories: policies *preventing* incidents and policies *responding* to incidents. The policies are further organized by what they most directly impact: people, finances, and infrastructure. Finally, policies affecting people are further organized by who is affected: students, faculty and staff, or everyone. For example, the “Alert Carolina Protocols” affect everyone on campus so Alert Carolina is listed under “Everyone.”

I. Prevention of Safety Incidents

A. People

a. Students

1. Campus Housing

The Carolina Housing website⁴ lists numerous Policies and Procedures for student safety in campus housing, including:

- a. Alert Carolina
- b. Availability of Staff Members
- c. Bomb Threats
- d. Building Evacuation
- e. Campus Transportation
- f. Campus Warning Siren
- g. Door Security
- h. Emergency Blue Light Call Boxes
- i. Emergency Text Messaging
- j. Fire Safety
- k. Interpersonal Violence
- l. Medical Emergencies and Injuries
- m. Missing Persons
- n. Nighttime Walking Across Campus
- o. Police and Public Safety
- p. Room Safety Measures
- q. Theft
- r. Weather Emergencies

2. Immunization Requirement

As stated in the University Catalog, “effective July 1, 1986, North Carolina state law requires that no person shall attend a college or university in North Carolina unless a certificate of immunization indicating that the person has received the

⁴ Carolina Housing, “Keeping You Safe,” <https://housing.unc.edu/residence-life/keeping-you-safe>.

immunizations required by the law is presented to the college or university on or before the first day of matriculation.”⁵

b. Faculty and Staff⁶

1. Violence in the Workplace

The “Violence in the Workplace Policy,”⁷ prohibits workplace violence, possession of, use, or threat to use an authorized weapon, misuse of authority in such a way that constitutes violence, or off-duty violent conduct that threatens the University or its “employees, students, clients, visitors, or vendors.”

2. Alcohol and Controlled Substances Testing

The “Policy on Alcohol and Controlled Substances Testing,”⁸ which requires that all University employees who operate “commercial motor vehicle while on duty” are subject to drug and alcohol testing. The Policy states that “testing occurs in pre-employment, random, reasonable suspicion, post-accident, return-to-duty, and follow-up contexts. Drivers are only subject to alcohol testing while they are performing, about to perform, or immediately after performing safety-sensitive functions. Drivers are subject to controlled substances testing at all times while they are on duty.”

3. Responsible Employee Training

The University’s “Policy on Prohibited Discrimination, Harassment and Related Misconduct”⁹ (PPDHRM) requires that any staff identified as a Responsible Employee must “immediately report” all “incidents of discrimination, harassment, sexual violence, interpersonal violence and stalking” that “come to their attention” to the UNC Equal Opportunity and Compliance Office.¹⁰

⁵ University Catalog, “Immunization Requirement,” <https://catalog.unc.edu/policies-procedures/university-policies/>. See also N.C. General Statute 130A-155.1, https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_130A/GS_130A-155.1.pdf.

⁶ Including Research Assistants (RAs), Teaching Assistants (TAs), Postdoctoral researchers (Postdocs), and SHRA student employees.

⁷ “Violence in the Workplace Policy,” <https://unc.policystat.com/policy/5219849/latest/>.

⁸ “University of North Carolina at Chapel Hill Policy on Alcohol and Controlled Substances Testing,” <https://unc.policystat.com/policy/4665037/latest/>.

⁹ “Policy on Prohibited Discrimination, Harassment and Related Misconduct Including Sexual and Gender-Based Harassment, Sexual Violence, Interpersonal Violence and Stalking,” <https://unc.policystat.com/policy/4514917/latest/>.

¹⁰ See Safe at UNC, “Responsible Employees,” <https://safe.unc.edu/learn-more/responsible-employees/>.

c. Everyone

1. Protection of Minors

The University Protection of Minors Office has a Policy, Standard, and Procedure detailing the requirements that any member of the “University Community” (faculty, staff, students, visitors, volunteers, contractors, vendors, etc.) protect minors (defined as a person under 18 years of age) and report any suspected abuse or neglect of a minor.¹¹

2. Weapons on Campus

The University Catalog’s “Fireworks, Firearms, and Other Weapons” Policy states that it is illegal under North Carolina law “to possess or carry, openly or concealed, any gun, rifle, pistol, or other firearm of any kind, or any dynamite cartridge, bomb, grenade, mine, or powerful explosive on any University campus, in any University-owned or operated facility, or at a curricular or extracurricular activity sponsored by the University. Such conduct also may constitute a violation of the Honor Code.”¹²

3. Closed Circuit Television (CCTV) Policy

The University has a CCTV policy designed to “standardize the type and regulate the use of closed circuit television (CCTV) cameras owned and/or leased by [UNC-Chapel Hill] to monitor property for the purposes of safety and security.”¹³ The University currently does not have a campus-wide CCTV camera network. Installation, maintenance, and use of CCTV cameras falls to individual schools and units.

4. Equal Opportunity and Compliance (EOC)

UNC’s EOC Office has a series of Policies and Procedures designed to ensure non-discrimination; religious accommodation; protection from harassment; and the provision of reasonable accommodations for disabled employees, applicants, and visitors.¹⁴ The most prominent EOC Policy is the PPDRHM.¹⁵ In addition to

¹¹ “Protection of Minors Policy,” <https://unc.policystat.com/policy/4987607/latest/>. “Standard on Protection of Minors,” <https://unc.policystat.com/policy/4988486/latest/>. “Procedure for Protection of Minors,” <https://unc.policystat.com/policy/4988676/latest/>.

¹² University Catalog, “Fireworks, Firearms, and Other Weapons,” <https://catalog.unc.edu/policies-procedures/university-policies/>. See also N.C. General Statute 14-269.2, https://www.ncleg.net/EnactedLegislation/Statutes/PDF/BySection/Chapter_14/GS_14-269.2.pdf.

¹³ “Closed Circuit Television (CCTV) Policy,” <https://unc.policystat.com/policy/4473819/latest/>.

¹⁴ UNC Equal Opportunity and Compliance, “Our Policies,” <https://eoc.unc.edu/our-policies/>. See also the “Safe at UNC” website, <https://safe.unc.edu/>.

¹⁵ Policy on Prohibited Discrimination, Harassment and Related Misconduct Including Sexual and Gender-Based Harassment, Sexual Violence, Interpersonal Violence and Stalking, <https://unc.policystat.com/policy/4514917/latest/>.

establishing the Responsible Employee requirements outlined above, the University's PPDHRM prohibits discrimination, harassment, sexual violence, sexual exploitation, stalking, interpersonal violence, as well as complicity in assisting in any such act. This Policy applies to all students and employees. The non-discrimination sections "also apply to contractors and other third parties under circumstances within the University's control." The University has proposed additional edits to the PPDHRM and is waiting to hear back from the US Department of Education on whether those edits are approved.¹⁶

5. Environment, Health and Safety (EHS)

UNC EHS has Policy manuals dealing with

- a. Biological Safety;
- b. Environment, Health and Safety;
- c. Industrial Maintenance and Construction/Support Services Safety;
- d. Laboratory Safety; and
- e. Radiation Safety.¹⁷

The Environment, Health and Safety Manual¹⁸ in particular deals with a wide range of safety-related concerns. Examples include workplace inspections; personal security and crime prevention awareness; developing emergency evacuation plans; sanitation; animals on campus; reporting incidents, personal injuries, and near misses; first aid; asbestos control; and fire safety.

EHS also has "Standard Operating Procedures" for handling a variety of hazardous chemicals.¹⁹

6. Transportation and Parking

The UNC Transportation and Parking Department creates and administers the "Ordinance Regulating Traffic and Parking on the Campus of the University of North Carolina at Chapel Hill" ("the Ordinance").²⁰ The Ordinance states that "provisions set forth in this Ordinance are designed to ensure the safety and protection of all users of the system." Examples of such provisions include Procedures for requesting handicapped parking permits, establishing campus

¹⁶ Senior Associate Vice Chancellor for Workforce Strategy, Equity and Engagement Becci Menghini can provide more details on the proposed edits and estimated timeline for US Government approval.

¹⁷ UNC Environment, Health and Safety, "Safety Manuals,"

[https://unc.policystat.com/policy_search/reference/?terms=51340&terms=52420&terms=51477&terms=51344&terms=51349&search_query=.](https://unc.policystat.com/policy_search/reference/?terms=51340&terms=52420&terms=51477&terms=51344&terms=51349&search_query=)

¹⁸ UNC Environment, Health and Safety, "Environment, Health and Safety Manual,"

[https://unc.policystat.com/policy_search/reference/?terms=52420&search_query=.](https://unc.policystat.com/policy_search/reference/?terms=52420&search_query=)

¹⁹ UNC Environment, Health and Safety, "Standard Operating Procedures,"

[https://unc.policystat.com/policy_search/reference/?terms=60857&search_query=.](https://unc.policystat.com/policy_search/reference/?terms=60857&search_query=) See also "Instructions for Preparing a Hazard Management Program," [https://unc.policystat.com/policy/5051283/latest/.](https://unc.policystat.com/policy/5051283/latest/)

²⁰ The Ordinance Regulating Traffic and Parking on the Campus of the University of North Carolina at Chapel Hill," [https://unc.policystat.com/policy/4760460/latest/.](https://unc.policystat.com/policy/4760460/latest/)

speed limits, regulating use of sidewalks, and yielding right-of-way to pedestrians at marked crosswalks.

7. Use of Indoor and Outdoor Spaces on Campus

UNC has Policies, Standards, and Procedures governing the safe use of indoor and outdoor spaces at the University through the “Facilities Use” Policy and Standard²¹ and the “Access and Use of Buildings Policy.”²² The “Access and Use of Buildings Policy” also addresses weapons on campus by stating that “No firearms, weapons or other materials posing a safety hazard as determined by UNC Public Safety are permitted in buildings.”

8. Free Expression

The University recently approved a “Freedom of Speech and Expression” Policy²³ and Standard²⁴. The University is also bound by the UNC System Policy 1300.8, “Free Speech and Free Expression Within the University of North Carolina,”²⁵ which was enacted to comply with North Carolina General Statute Chapter 116, Article 36, “Campus Free Speech.”²⁶ UNC System Policy 1300.8 states, in part, that “As the nation’s first public university, the University of North Carolina affirms its long-standing commitment to free speech and free expression for its students, faculty members, staff employees, and visitors under the First Amendment of the U.S. Constitution and Article 1, Section 14 of the North Carolina Constitution. The University and its constituent institutions protect and promote these freedoms, consistent with First Amendment jurisprudence.”

9. Alcohol

The University’s “Alcohol Policy” regulates the purchasing, serving, and other use of alcohol on “at the University and by Campus Members” (including faculty, staff, students, visitors, etc.). The “Alcohol Policy” is “designed to support the larger mission of the University and to promote the values of honor and integrity, personal responsibility, dynamic learning, and community engagement ... and promotes the safety and well-being of all members of the University community.” However, this document is the longest policy document at UNC, combining a mix

²¹ “University of North Carolina at Chapel Hill Facilities Use Policy,” <https://unc.policystat.com/policy/5537599/latest/>. “University of North Carolina at Chapel Hill Facilities Use Standard,” <https://unc.policystat.com/policy/5537606/latest/>.

²² “Access and Use of Buildings,” <https://unc.policystat.com/policy/4473804/latest/>.

²³ “Policy on Freedom of Speech and Expression,” <https://unc.policystat.com/policy/6350471/latest/>.

²⁴ “Freedom of Speech and Expression University Standard,” <https://unc.policystat.com/policy/6350637/latest/>.

²⁵ UNC System Office, “Policy 1300.8 - Free Speech and Free Expression Within the University of North Carolina,” <https://www.northcarolina.edu/apps/policy/index.php?section=1300.8>. See also UNC System Office, “Campus Free Speech and Free Expression,” <https://www.northcarolina.edu/campus-free-speech>.

²⁶ N.C. General Statute Chapter 116, Article 36 “Campus Free Speech,” https://www.ncleg.net/EnactedLegislation/Statutes/PDF/ByArticle/Chapter_116/Article_36.pdf.

of Policy, Standards, and Procedures into one document; this makes quickly finding relevant information in the document challenging.

10. International Travel

The University has Policies and Procedures in place to help protect all UNC “affiliates” who travel outside the United States. The “Policy Concerning Global Study, Travel, and Research”²⁷ detailed the requirements and Procedures that any UNC affiliates (described in the Policy as “students, faculty, staff, and others”) must follow when traveling outside the United States, including registering all foreign travel in advance in the University’s Global Travel Registry. Additional preventative security measures are in place for countries that the US Department of State or the Centers for Disease Control have issued travel warnings for, up to and including complete travel bans.

11. Drones

The University’s “Unmanned Aircraft Systems” (UAS) Policy²⁸ regulates the use of UAS by anyone on University campus and by University officials anywhere in the world for University operations. The Policy states, in part, that “Users of UAS on campus must exercise extreme caution, due to the University’s proximity to Horace Williams Airport and regular flights by UNC Air Care helicopters.”

12. No Smoking

The University “No Smoking” Policy states that smoking is prohibited in all University buildings, State-owned vehicles, and “outdoor areas controlled by the University up to 100 feet from University facilities.”²⁹ However, enforcement of this Policy has been inconsistent since implementation.

13. Animal Care and Use

The UNC Institutional Animal Care and Use Committee (IACUC) has a Policy and a series of Standards and Procedures for “ensuring compliance with federal animal welfare regulations, inspecting animal facilities and investigator laboratories, investigating animal concerns, and overseeing training and educational programs.”³⁰

²⁷ Please see the “Policy Concerning Global Study, Travel and Research” on the UNC Global website: <https://global.unc.edu/travel-info/>.

²⁸ Unmanned Aircraft Systems Policy, <https://unc.policystat.com/policy/4473844/latest/>.

²⁹ No Smoking Policy, <https://unc.policystat.com/policy/5884957/latest/>.

³⁰ UNC, “Institutional Animal Care and Use Committee,” <https://research.unc.edu/iacuc/>.

B. Financial

1. UNC Finance

UNC Finance has a wide variety of Policies, Procedures, and Forms meant to regulate the expenditure of funds and protect the University's financial resources from fraud, theft, and abuse. The UNC Finance Manual³¹ has chapters addressing the following topics:

- a. Financial Systems;
- b. Cash, Deposits, and Petty Cash;
- c. Investments/Endowments;
- d. Billings, Advances, Receivables, and Collection;
- e. Capital Assets (Land, Equipment, Buildings);
- f. Liabilities/Payables;
- g. Debt;
- h. Budget;
- i. Payroll and Benefits;
- j. Expenses; and
- k. Travel

2. Internal Audit

UNC Internal Audit also has Policies and Procedures designed to mitigate financial risk for the University and "evaluate whether resources are used in keeping with State requirements and the University's mission, goals, and objectives."³²

3. Campus Safety and Risk Management

University Campus Safety and Risk Management has numerous Policies, Forms, and other resources regarding insurance for persons, automobiles, campus departments, and University property.³³

³¹ UNC Finance Manual, https://unc.policystat.com/policy_search/reference/?terms=49255&terms=49252&terms=49253&terms=49254&terms=49256&terms=49257&terms=49258&terms=49259&terms=49273&terms=49274&terms=49275&terms=49277&terms=49281&search_query=.

³² UNC-Chapel Hill, Internal Audit Department, <https://internalaudit.unc.edu/>.

³³ UNC Campus Safety and Risk Management, https://unc.policystat.com/policy_search/category/?search_query=&terms=54408.

C. Infrastructure

1. Campus Safety and Risk Management

UNC Campus Safety and Risk Management has a Policy and Procedure on “Continuity Planning/Tar Heel Mission Ready Planning,”³⁴ which establishes a plan to be carried out in the event of an “unexpected or catastrophic event ... These plans provide an organized support system to the entire University population, allow critical services to continue functioning during the event, and hasten the resumption of normal operations following the event.”

II. Response to Safety Incidents

A. People

a. Students

1. Emergency Evaluation and Action Committee

The University’s Emergency Evaluation and Action Committee is a committee with members from Student Affairs, Carolina Housing, UNC PD, and other key stakeholders. The committee has a Policy and Procedures³⁵ to quickly assess and respond to perceived threats from students on campus.

2. Missing Person Protocol

UNC has a “Missing Person Protocol” for University staff to respond “in the event University officials receive a report that a person residing in on-campus housing is missing.”³⁶ This protocol involves collaboration by Carolina Housing, the Office of the Dean of Students, and the UNC PD. The University can also collaborate with other, external, law enforcement agencies as appropriate.

³⁴ University of North Carolina at Chapel Hill Policy on Continuity Planning/Tar Heel Mission Ready Planning, <https://unc.policystat.com/policy/5938362/latest/>. University of North Carolina at Chapel Hill Procedure on Preparing Mission Ready Continuity Plans, <https://unc.policystat.com/policy/5947604/latest/>. See also the UNC Campus Safety and Risk Management’s “Tar Heel Mission Ready” website at: <https://campussafety.unc.edu/risk-management/tar-heel-mission-ready/>.

³⁵ Emergency Evaluation and Action Committee Policy and Procedures, <https://unc.policystat.com/policy/4639588/latest/>.

³⁶ Missing Person Protocol, <https://unc.policystat.com/policy/4639589/latest/>.

b. Faculty and Staff

1. Violence in the Workplace

The University has an Employee Threat Assessment and Response Team designed to assess and respond to potential or immediate acts of workplace violence, in accordance with the “Workplace Violence Policy” discussed above. Additionally, anyone who has been the subject of workplace violence at the University should fill out a “Workplace Violence Reporting Form” and submit the form to Employee and Management Relations within 30 days of the incident.³⁷

2. Employee Assistance Program (EAP)

UNC has an Employee Assistance Program (EAP) “designed to help University employees and their families deal with both personal and work-related concerns.”³⁸ The EAP website does not have a formal EAP policy statement but does limit eligibility to current employees and their dependents, as well as former employees for up to six (6) months after separation from the University. The EAP website also has Procedures for how to contact EAP counselors 24 hours a day.

c. Everyone

1. Reporting Students in Distress

The UNC Office of the Dean of Students website directs concerned individuals to “call 911 or Campus Police 919.962.8100” if the student is “a potential harm to self or others” and to contact the Office of the Dean of Students if the concerned individual assesses the student in question is not a potential harm to self or others.³⁹

The UNC Counseling and Psychological Services (CAPS) website also directs concerned individuals to “call 911, go to a local hospital emergency room, or call campus police at 919-962-8100.”⁴⁰

2. Reporting Missing Persons

The Office of the Dean of Students website directs anyone wishing to report a missing person to “please contact 911 or the UNC-CH Department of Public Safety at (919) 962-8100.”⁴¹

³⁷ Violence in the Workplace Policy, <https://unc.policystat.com/policy/5219849/latest/>.

³⁸ UNC Human Resources, “Employee Assistance Program (EAP),” <https://hr.unc.edu/benefits/work-life/eap/>.

³⁹ UNC Office of the Dean of Students, “Urgent Concerns,” <https://odos.unc.edu/urgent-concerns>.

⁴⁰ UNC Counseling and Psychological Services, “Urgent Concerns,” <https://caps.unc.edu/services/urgent-concerns>.

⁴¹ UNC Office of the Dean of Students, “Missing Persons,” <https://odos.unc.edu/urgent-concerns/crisis-response/missing-persons>.

3. Alert Carolina

The “Alert Carolina” Emergency Notification System is the tool by which UNC “communicates in multiple ways with students, faculty and staff, as well as visitors, local residents, parents and the news media in the event of an emergency or dangerous situation.”⁴² The University publishes “Alert Carolina Protocols” to govern details for the system, including training, different types of notifications, establishing Responsible University Authorities, and system authorizations.⁴³

4. Adverse Weather and Emergency Events

UNC-Chapel Hill has an “Adverse Weather & Emergency Closing” Policy.⁴⁴ The Policy establishes the criteria by the University will reduce campus operations, suspend campus operations, or completely close the campus. The Policy applies to all faculty, staff, and students.

UNC-Chapel Hill also looks to the UNC System Office’s “Adverse Weather and Emergency Event Policy”⁴⁵ “during severe weather and when considering key factors in deciding whether to reduce or suspend operations due to safety concerns.” The UNC System Policy “establishes broad guidelines for how operations may be affected during emergencies and establishes work expectations for employees.” The UNC System Policy only covers employees “who are subject to the State Human Resources Act; it excludes University employees who are exempt from this Act unless otherwise directed by the President of the University.”

5. Whistleblower/Protection from Retaliation

The University’s “Whistleblower Policy” invites any member of the Carolina Community (students, faculty, staff, contractors, vendors, volunteers, visitors, etc.) to “report possible Wrongful Conduct to an appropriate authority so that prompt, corrective action can be taken by the University.”⁴⁶ The Policy also explicitly protects whistleblowers against retaliation (defined as “any action taken against an individual because of the individual’s participation in Protected Activity that would discourage a reasonable person from engaging in Protected Activity”).

⁴² Alert Carolina, “About,” <https://alertcarolina.unc.edu/about/>.

⁴³ The latest version of the Protocols can be accessed from the Alert Carolina “About” landing page. The direct link for the current Protocols is: <https://alertcarolina.unc.edu/wp-content/uploads/2019/05/system-protocols.pdf>.

⁴⁴ Adverse Weather & Emergency Closing, <https://hr.unc.edu/benefits/leave-holidays/weather-emergency/>.

⁴⁵ UNC System Office, “Adverse Weather and Emergency Event Policy,” <https://myapps.northcarolina.edu/hr/download/283/adverse-weather-283/5146/adverse-weather-and-emergency-event-policy-2.pdf>. See also the UNC System Office Adverse Weather information page: <https://myapps.northcarolina.edu/hr/employee-relations/adverse-weather/>.

⁴⁶ The University of North Carolina at Chapel Hill Whistleblower Policy, <https://unc.policystat.com/policy/6356621/latest/>.

6. Reporting an Incident

The University has several reporting hotlines for individuals wishing to report concerns. Some, but not all, of the resources explicitly allow for confidential and/or anonymous reporting.

UNC PD

- a. The UNC PD has several websites and other resources for individuals to report alleged criminal activity, including:
 - i. the “Silent Witness” webpage that allows users to anonymously report a crime online.⁴⁷
 - ii. The UNC Police “Report a Crime” page⁴⁸ has additional resources and phone numbers individuals can call to report alleged criminal activity. One number on the site specifically allows for anonymous reporting.
 - iii. The UNC Police “Commendation & Complaint Procedures” webpage allows anyone to praise or criticize a member of the UNC Police.⁴⁹ The page states that “identification (including email address) will be required. Any messages sent that are not verifiable will be regarded as unfounded notification. Anonymous reports may be made by direct mailing or calling UNC Police, however be aware that anonymity will weaken the legitimacy of the report being filed.”
 - iv. The UNC Police also have Procedures for users to download the “LiveSafe” smart phone application (“app”). The UNC Police website states that the LiveSafe app provides users “with a direct connection to UNC Police so that everyone can easily communicate all their safety needs.”⁵⁰
 - v. Finally, the UNC Police “CarolinaSafe” website landing page includes links to other UNC campus units, including EHS, Parking and Transportation, and EOC’s “Safe at UNC” website.⁵¹
- b. While each of these resources are safety-related, it is not clear to which, if any, UNC PD or University Policies these resources correspond.

⁴⁷ UNC Police, “Silent Witness,” <https://police.unc.edu/silent-witness/>.

⁴⁸ UNC Police, “Report a Crime,” <https://police.unc.edu/report-crime/>.

⁴⁹ UNC Police, “Commendation & Complaint Procedures,” <https://police.unc.edu/about/role/commendation-complaint/>.

⁵⁰ UNC Police, “LiveSafe,” <https://police.unc.edu/carolinasafe/livesafe/>.

⁵¹ UNC Police, “CarolinaSafe,” <https://police.unc.edu/carolinasafe/>.

UNC EOC

- a. The UNC EOC Office has a confidential “Report an Incident” page allowing concerned individuals to report alleged violations of EOC Policies.⁵² It is not clear if individuals can make these reports confidentially or anonymously.

Office of Student Affairs

- a. The UNC Office of Student Affairs has a “Report a Violation to the Office of Student Conduct” website.⁵³ In addition to letting individuals report alleged academic misconduct covered under the UNC Honor Code, the website allows individuals to report non-academic misconduct, including, but “not limited to: fighting, hazing, drug use, lying, and disorderly conduct,” as well as violations of the UNC “Alcohol Policy.” It is not clear if individuals can make these reports confidentially or anonymously.

Office of Ethics and Policy

- a. The UNC Office of Ethics and Policy runs the “Carolina Ethics Line,” which is hosted by a third-party vendor and allows either confidential or completely anonymous reporting of questions or allegations of alleged misconduct.⁵⁴
- b. The Office of Ethics and Policy also has a “Contact Us” form on their website, which allows anyone to contact the office with questions or allegations of misconduct but is not anonymous.⁵⁵

B. Financial

1. Reporting Misuse of University Property or Funds

In addition to the preventative Policies, Procedures, and Forms outlined in Section I., UNC Finance also has a Policy and Procedure for reporting “Misuse of University Property or Funds.”⁵⁶

The UNC System Office also has a “hotline” for anyone to report “suspicion or knowledge of fraud, waste, abuse or misuse of University resources; violation of laws, regulations or policy; ineffective operations; or other concerns related to

⁵² UNC Equal Opportunity and Compliance, “Report an Incident,” <https://eoc.unc.edu/report-an-incident/>.

⁵³ UNC Office of Student Affairs, “Report a Violation to the Office of Student Conduct,” <https://studentconduct.unc.edu/report-violation-office-student-conduct>.

⁵⁴ UNC Office of Ethics and Policy, “Report a Concern or Student Complaint,” <https://ethicsandintegrity.unc.edu/report-a-concern-or-student-complaint/>. The direct link to Carolina Ethics Line is <https://secure.ethicspoint.com/domain/media/en/gui/10808/index.html>.

⁵⁵ UNC Office of Ethics and Policy, “Contact Us,” <https://ethicsandintegrity.unc.edu/contact-us/>.

⁵⁶ Finance Policy 104 - University of North Carolina at Chapel Hill Policy on Misuse of University Property or Funds, <https://unc.policystat.com/policy/4469239/latest/>. Finance Procedure 104.1 - University of North Carolina at Chapel Hill Procedure on Reporting Misuse of University Property or Funds, <https://unc.policystat.com/policy/4478958/latest/>.

activities that may be detrimental to the UNC System Office, the University and its constituents or its reputation.”⁵⁷

The UNC Internal Audit Office also directs users to the North Carolina Office of the State Auditor’s hotline and website.⁵⁸ The State Auditor’s hotline and website are additional resources where anyone may report “alleged fraud, misappropriation, mismanagement or waste of state resources ... alleged violations of state or federal law, rule or regulation in administering state or federal programs, and substantial and specific danger to the public health and safety.”

C. Infrastructure

UNC’s EHS Office has contact information embedded in each of their policy documents. EHS also has a “Contact Us” page with guidance for who on campus to call in a variety of emergencies such as building fires, chemical spills, gas leaks, mold growth, and water leaks.⁵⁹

Areas for Attention in UNC-Chapel Hill Policy Environment Regarding Safety Incidents

1. 3-D Printing of Weapons

The UNC-Chapel Hill “Policy on Access and Use of Buildings” says that “weapons, firearms or other materials posing a safety hazard” are not permitted within buildings but does not address the manufacture of these weapons or parts of these weapons. N.C. General Statute 14-269.2 prohibits knowingly possessing or carrying any weapon on educational property, unless for educational or school-sanctioned ceremonial purposes.⁶⁰ The statute defines a weapon as “any gun, rifle, pistol, other firearm of any kind, dynamite cartridge, bomb, grenade, mine, powerful explosive, BB gun, stun gun, air rifle, air pistol, bowie knife, dirk, dagger, slingshot, leaded cane, switchblade knife, blackjack, metallic knuckles, razors and razor blades (except solely for personal shaving), firework, or any sharp-pointed or edged instrument except instructional supplies, unaltered nail files and clips and tools used solely for preparation of food, instruction, and maintenance.” The University Policy and state statute leave two gaps in determining how to consider the 3-D printing of weapons:

⁵⁷ UNC System Office, “Hotline - Report a Concern,” <https://www.northcarolina.edu/internal-audit/hotline-report-concern>.

⁵⁸ North Carolina Office of the State Auditor, “State Auditor Hotline,” <https://www.ncauditor.net/pub42/Hotline.aspx>.

⁵⁹ UNC Environment, Health and Safety, “Contact Us,” <https://ehs.unc.edu/about/contact/>.

⁶⁰ N.C. General Statute 14-269.2, “Weapons on campus or other educational property,” https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_14/GS_14-269.2.pdf.

- a. If weapons or parts of weapons can be manufactured on campus; and,
- b. If the printing of these weapons or weapon parts can be considered “educational” under any circumstances, such as part of a Makerspace project⁶¹ or for a class.

2. Foreign Influence in University Research

In May 2019, the UNC Vice Chancellor for Research Terry Magnuson issued a memo outlining steps the University plans to take to develop additional guidance around the topic of foreign influence in University Research. According to the memo, “the U.S. Government has raised concerns about foreign threats to the integrity of research at national academic and research institutions. The concerns revolve around three main areas:

- Diversion of intellectual property to foreign entities
- Disclosing confidential grant application information by NIH peer reviewers to third parties
- Failure of researchers to disclose research resources and support provided by other organizations, including foreign entities”⁶²

3. Food Insecurity

New research suggests the number of college students facing food insecurity and hunger has been grossly underestimated in previous studies. A recent article in *Inside Higher Ed* summarized the latest findings by stating that “more research is needed to accurately estimate the number of college students facing food insecurity and hunger, as awareness of the problem grows and lawmakers and colleges grapple with it.”⁶³ Harvard researcher Anthony Abraham Jack recently described similar evidence in his book *The Privileged Poor*, with students describing Spring Break as a literal *Hunger Games* since their university closes the campus dining hall during the break.⁶⁴

⁶¹ UNC, “Be a Maker,” <https://beam.unc.edu/>.

⁶² Terry Magnuson, “SUBJECT: Concerns regarding inappropriate foreign influence and university research,” May 2, 2019, <http://researchcompliance.web.unc.edu/foreign-influence/full-guidance/>.

⁶³ Ashley A. Smith, “Discrepancies in Estimates on Food Insecurity,” April 30, 2019, *Inside Higher Ed*, <https://www.insidehighered.com/news/2019/04/30/new-research-finds-discrepancies-estimates-food-insecurity-among-college-students>.

⁶⁴ Anthony Abraham Jack, *The Privileged Poor: How Elite Colleges Are Failing Disadvantaged Students* (Cambridge, MA: Harvard University Press, 2019). Food insecurity is discussed on pages 164-180. See also Chris Quintana, “Can This Man Change How Elite Colleges Treat Low-Income Students?” February 15, 2019, *The Chronicle of Higher Education*, <https://www.chronicle.com/article/can-this-man-change-how-elite/245714>.

At UNC specifically, a recent *Daily Tar Heel* (DTH) article highlighted the financial pressures many lower-income students are under, even those who qualify for the Carolina Covenant program, leading hundreds of current and former UNC students to sign up on “sugar daddy” websites like “SeekingArrangement” for supplemental income. Julie, a 2018 UNC graduate, was quoted in the article as saying “Having the money meant I could go out more, I could not worry so much about where my next meal is going to come from, I don’t have to worry about paying for my medicine, because I now have the money for it.”⁶⁵

UNC has an on-campus, student-run, food pantry, the Carolina Cupboard.⁶⁶ However, there do not appear to be any specific Policies on this topic or related items, such as clarifying in Policy if UNC dining halls are to remain open during Spring Break, for example, when lower-income students stay on campus rather than leave. The Carolina Dining Services website simply states that “Our locations’ hours are aligned with the University’s academic calendar.”⁶⁷

4. Lack of Transparency Regarding UNC PD Policies and Procedures

UNC PD Policies and Procedures are not published online for public access and review. For example, after one recent controversy, staff writers at the DTH noted that the DTH “was unable to find UNC’s policies and procedures on issuing trespass orders online.”⁶⁸ This lack of public access to UNC PD Policies and Procedures has led to a lack of basic understanding and awareness by other members of the Carolina Community of how the UNC PD is trained to deploy and manage often difficult and chaotic situations.

The law firm Parker Poe issued a report⁶⁹ documenting systematic mistakes by UNC PD the night the “Silent Sam” statue was torn down.⁷⁰ UNC’s response, contained at the end of the Parker Poe report, notes that:

- “We [UNC-Chapel Hill] will develop a policy that outlines our roles and the roles of other University leaders in the planning, briefing and review of operations plans developed by the police.”

⁶⁵ Kate Karstens, “514 UNC students are on SeekingArrangement. Who’s behind the number?” March 28, 2019, *The Daily Tarheel*, <https://www.dailytarheel.com/article/2019/03/sugar-baby-university-0329>.

⁶⁶ UNC Heel Life, “Carolina Cupboard,” <https://heellife.unc.edu/organization/carolinacupboard>. See also <http://carolinacupboard.web.unc.edu/>.

⁶⁷ UNC Carolina Dining Services, “Hours of Operation,” <https://dining.unc.edu/special-hours/>.

⁶⁸ Taylor Buck, “Trespass notices were dropped for seven anti-Silent Sam demonstrators,” January 30, 2019, *The Daily Tar Heel*, <https://www.dailytarheel.com/article/2019/01/trespass-orders-0130>.

⁶⁹ Parker Poe, “SILENT SAM Monument After Action Assessment Report,” October 22, 2018, http://mediad.publicbroadcasting.net/p/wunc/files/201902/unc_after_action_assessment_report_-_final.pdf.

⁷⁰ See Jane Stancill, “Silent Sam report finds deficiencies at UNC but ‘no evidence of a conspiracy’ to topple statue,” February 1, 2019, *The News & Observer*, <https://www.newsobserver.com/news/politics-government/article225409700.html>.

- We [UNC-Chapel Hill] agree with the recommendations that (i) a wide variety of intelligence sources need to be consulted and analyzed in advance of events, including collaborating with ISAAC, the Fusion Center, other state resources and other campuses; (ii) our officers receive regular training in intelligence-gathering; (iii) the Chief should regularly brief the Chancellor and leadership on intelligence information; and (iv) the police department should conduct after-action reports, to be shared with the Chancellor and senior administrators. We will develop policies that outline how these responsibilities and functions will be shared and implemented.”
- “We [UNC-Chapel Hill] will develop policies to outline how our ongoing training programs will better protect our officers and our campus.”

Recommendations

1. Explicitly State Underlying Assumptions About Campus Safety

As part of its response to Interim Chancellor Guskiewicz’s charge to “provide vision and guidance to the University in the delivery of campus safety services,” the Campus Safety Commission should explicitly state and review all key underlying assumptions regarding campus safety.

For example, what roles or actions is UNC legally obligated to carry out to provide campus safety? What roles or actions should UNC carry out to provide campus safety above and beyond the legal minimums? The cultural pendulum has swung away in past decades from the legal principle of *loco parentis* but seems to be swinging back to more of a middle ground.⁷¹ Does UNC want to follow that trend towards a middle ground? What does that look like in reality at UNC?

2. Make UNC PD Policies and Procedures Publicly Accessible

UNC should make the UNC PD’s Policies and Procedures publicly accessible. Some of the UNC PD’s Policies or Procedures may need to remain hidden from public view if UNC administrators, in coordination with University Counsel and the UNC PD, determine the Policies or Procedures are considered “sensitive or

⁷¹ Vimal Patel, “Why Colleges Are Keeping a Closer Eye on Their Students’ Lives,” February 18, 2019, *The Chronicle of Higher Education*, <https://www.chronicle.com/interactives/Trend19-InLoco-Main>.

tactical.” However, the default should shift from “need to know” to “need to share.”

The Town of Chapel Hill Police Department publishes their “Policy Manual” and “Standard Operating Procedures” online⁷² while also reserving “the right to withhold or redact any policies that are considered sensitive or tactical in nature” in accordance with N.C. General Statute 132-1.7 (“Sensitive Public Security Information”).⁷³

3. Have UNC PD Engage in More “Community Policing”

Community-oriented policing is a systematic approach to policing with the goal of instilling a sense of community to improve the quality of life.⁷⁴ The UNC PD should boost their physical presence on campus in non-confrontational, non-emergent situations with the express purpose of forming better relationships between UNC PD Officers and other members of the campus community. If members of the campus community encounter UNC PD Officers currently, it is often while the Officer is driving on or near campus in an official vehicle, or at the scene of a disturbance. UNC PD officers should be regular, community-building, problem-solving figures on campus.

The UNC PD’s 2018 *Annual Security and Fire Safety Report* has a section devoted to UNC PD’s “Security Awareness and Crime Prevention Programs,” such as “Coffee with a Cop,”⁷⁵ but it is not clear from these programs how often UNC PD officers are on campus outside of these defined, time-limited programs.

4. Commit to Making the UNC Campus Safety Commission Recommendations Public

The UNC Safety Commission should make all its recommendations publicly available with the purpose of educating the entire Carolina Community on existing Policies, Procedures, and resources related to campus safety, and to communicate publicly the Commission’s vision for the future of campus safety at UNC and how the Commission thinks the Carolina Community should go about making change.

⁷² Town of Chapel Hill Police, “Policy and Procedures Manual,” 2019, <https://www.townofchapelhill.org/town-hall/departments-services/police/office-of-professional-standards/policy-manual>.

⁷³ N.C. General Statute 132-1.7, “Sensitive public security information,” https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_132/GS_132-1.7.pdf.

⁷⁴ Willard M. Oliver, *Community Oriented Policing: A Systematic Approach to Policing, Second Edition* (Upper Saddle River, NJ: Prentice Hall Publishing, 2001).

⁷⁵ UNC Police, “Security Awareness and Crime Prevention Programs,” <https://police.unc.edu/about/security-fire-safety-report/sfsr-2018/security-awareness-and-crime-prevention-programs/>.