



Empire Education Corporation

Campus Security Plan

Emergency Action Plan Objective:

This plan outlines the actions and policies deemed necessary to provide a safe environment for the students, visitors, faculty and staff of the Empire Education Corporation, D.B.A. Mildred Elley Albany campus located at 855 Central Avenue , Metro Campus located at 25 Broadway in New York City, Pittsfield Campus Located at 505 East Street in Pittsfield Massachusetts and the Austin's School of Spa Technology campus located at 855 Central Avenue in Albany, New York.

Corporate Philosophy

It is the policy of Empire Education Corporation, Mildred Elley College and the Austin School of Spa Technology, "the school" to provide for the safety and security of all members of its campus community. The School believes that pursuit of academic excellence can only flourish in a safe environment where everyone on campus is treated with respect and courtesy. To this end, the school is committed to maintaining a safe learning environment free from disruptive behavior or dangerous conditions. In as much as it is possible this action plan seeks to be proactive when dealing with emergency conditions on campus. The key elements set forth in this plan will ensure that adequate procedures are in place to respond effectively to emergency conditions.

The following areas will be addressed in this plan:

- Facility location and description
- Faculty, staff, student and visitor identification
- Visitor protocol while visiting the campus
- Parking policies, Safety and Regulations
- Fire safety, prevention, and emergency evacuation procedures
- Disaster preparedness and procedures
- Criminal activities reporting
- Emergency notification procedures
- Assignment of emergency duties
- Documenting and reporting procedures for accidents/incidents
- Notification of pending disasters or potential life threatening incidents
- Hate crime, sexual harassment identification and reporting

School Locations

Empire Education's main campus is located at 855 Central Avenue in Albany New York. This three story office style building houses the corporate offices of the school, the Mildred Elley College itself and the Austin School of Spa Technology. Located in a commercial office park in a retail shopping district, the campus is approximately one mile from the center of downtown Albany. Empire Education maintains branch campuses in Pittsfield Massachusetts and New York City. The Pittsfield Massachusetts Campus is located at 505 East Street in a small commercial style shopping plaza in the heart of downtown Pittsfield. The Metro Campus is located in a 20 story commercial office building located at 25 Broadway in the financial district in New York City. Empire Education does not provide student housing or sponsor any off-campus activities at any of its campuses, so no other property is included in this emergency management plan. All locations share similar safety and security requirements. Campus specific procedures or requirements will be identified and addressed in this campus security plan.

Campus Access / Parking

All of the campuses are typically accessed by public transportation or private passenger vehicle. Ample off street public parking is available for the Albany and Pittsfield campuses. The New York campus has no parking and public transportation is the favored means of accessing the campus. The Albany and Pittsfield parking lots are contiguous to the school buildings and most spaces are within 200 feet of the entrances to the schools. A total of 400 combined spaces (100 Pittsfield, 300 Albany) are available for student/faculty/staff parking. The Capital District Transportation Authority operates the public city bus system in Albany and makes stops at regular intervals throughout the day and evening hours. The bus stop is located on the Central Avenue side of the office park property located approximately 300 feet from the main entrance of the school. The Berkshire Transit authority provides public transportation to the Pittsfield Campus and picks up and drops off riders within a short walking distance from the campus. The New York City campus is accessed by all forms of public transportation including: Bus, train and taxi. Various pay parking is available within a short walking distance from campus.

The private parking lots that are available to the schools in Albany and Pittsfield are owned and maintained by the landlord or the landlords agents. All parking is provided on a first come first served basis. The only parking that is reserved is the required handicapped parking spaces adjacent to the south side or Central Avenue side of the building on the Albany campus and in front of the main entrance at 505 East Street on the Pittsfield campus. All parking is provided on a first come first serve basis and all students, faculty and staff are required to display an identification sticker on the inside rear window or place other prominent position on the vehicle's glass. Vehicles not displaying a parking permit sticker will be subject to a written warning instructing them to register their vehicle with the student services department. Students who refuse to register their vehicles will be subject to towing. Parking permits are provided free of charge and are distributed during orientation for new students. The stickers are available at any time throughout the semester by registering at the student services office. Any cars parked in fire access lanes or in front of loading areas or any other marked "no parking areas" or who are illegally parked in a handicapped space will be subject to immediate removal by the landlord. Parking lots at the Albany campus are subject to video surveillance cameras 24 hours per day 7 days per week.

Identification

A key component to campus security is the identification of all persons entering or utilizing the three separate campus facilities throughout the week. All of the Campuses s have a combined

enrollment of approximately 1,200 students who are accessing the three facilities during the day, evening and weekend hours. For this reason it is very important that all students, faculty and staff be easily identifiable. All students, faculty and staff accessing the building are required to display a photo identification badge which must be prominently worn on a lanyard or a lapel clip so that it is plainly visible to any security personnel, faculty and staff or any other school official.

All visitors entering the facility are required to sign in and register at the front desk reception at the Albany and Pittsfield campuses and Visitors at the New York City Campus must either display a valid student identification at the security desk and use the electronic swiper card system located at both entrances of the school on the 16th floor. All visitors must have an official reason for visiting any of the school campuses and no visitor is permitted to move about the building unescorted. Upon leaving the facility visitors must sign out at the reception desk and turn in the visitors pass.

Fire Prevention and Workplace Hazards

It is the responsibility of all faculty and staff to alert the safety manager or floor marshals of any and all conditions that could potentially pose a fire hazard or any other unsafe condition in or around the building. No smoking is permitted in the building and any potentially flammable materials are required to be confined and stored in an appropriate locked area. Good housekeeping practices will be the responsibility of all faculty, staff and students. Waste materials are to be discarded in their proper places and all aisles, doorways, hallways and exit doors are to be kept clear at all times.

Timely Warnings

A condition or incident that could compromise the safety and well-being of any member of the Empire Education campus community will result in an appropriate timely warning being issued. Depending on the nature of the condition or incident, the warning will be initiated through a variety of methods.

Fire Alarm or Emergencies Requiring Building Evacuation

All campus buildings are equipped with fire detection and alarm systems consistent with the fire code requirements enforced in that city state or municipality. These systems are directly connected to the local fire departments responsible for that particular area. Though it is not expected or encouraged, fire extinguishers are provided throughout the building and are prominently marked so individuals may, at their discretion, use them when appropriate. Emergency phones are also provided on the second and third floor landing or “area of rescue” at the Albany campus location adjacent to the elevator doors. These phones are a direct line out of the building and are to be used on an emergency basis only.

All three campus fire alarm systems are fully automatic and meet all building and fire code requirements. Emergency fire alarm controls are positioned throughout the building at all doors that exit the floor or exit the building. Individuals detecting fire can manually pull any of these alarms initiating the alarm and fire department response. In the event that the alarm system is activated all occupants are required to vacate the building in an orderly and expedient manner. When activated, the alarm will be a recognizable siren accompanied by powerful strobe lights. This call to evacuate the building is virtually impossible to ignore.

In the event that a fire alarm is sounded all occupants are required to evacuate the building immediately. Key staff have been designated at each campus location to act as emergency marshals.

These marshals will be responsible for ensuring that all occupants of the floor and/or their section of the building vacate the premises in an orderly and expedient manner.

Marshals will be responsible for ensuring that all classrooms, offices and lavatories are vacated and that all occupants have vacated the building. Once it is verified that the building is vacated, all evacuees will be instructed to stand a minimum of 100 feet from the building, allowing fire or other emergency personnel access to the property. Yearly fire drills will be scheduled to ensure that all occupants of the building are familiar with evacuation procedures.

Reporting Criminal Activities / Emergencies

Any individual student, faculty or staff member witnessing a crime or criminal activity, or any potentially dangerous condition on campus, should immediately report the incident to the Campus Security Director, designated security and safety marshal or any other school official that is located on the floor they occupy. In the case of imminent danger, it is appropriate for any and all witnesses to contact 911 if it is in their best judgment that the situation warrants the call. In the event that a witness does contact 911 to report an emergency condition, that person must also contact a college or school official or safety marshal to allow the school to initiate any additional proper emergency actions. When contacting 911 it is essential that the caller be calm enough to provide accurate information so that the correct response can be initiated.

Campus Procedures for Reporting Dangerous Persons on Campus, Weapons or Shots Fired:

1. Contact the security leader or floor marshal on campus and identify yourself and the location of the dangerous person, weapon or shots fired.
2. The security teams will initiate action that will be appropriate and when feasible text messages and e-mail blasts will be initiated to alert the campus community through the student, faculty and staff data base response component of "Sonisweb".
3. If imminent danger exists on campus and the general warning has been initiated a lockdown alarm will sound. This alarm will be distinctive low tone that will call for the campus community to seek locked shelter. (i.e. classrooms, offices, clinics, library) all staff and faculty are instructed to gather all of the people in their general vicinity and move them to a locked room. All offices, classrooms and clinics are to lock the doors and turn the lights off and provide refuge from danger. While in lockdown people should be instructed to locate out of sight of doorways and windows (hallway wall, if possible). Cell phones are to be set to vibrate mode and all non-essential talking should cease.
4. The lockdown condition alarm will sound until circumstances are resolved. All phones and e-mail addresses registered in the school data base will receive text messaging and/or e-mail blasts to update conditions when available and appropriate.
5. All students, staff and faculty are to remain in locked rooms until released by the police department or designated campus safety/ security marshals. **UNDER NO CIRCUMSTANCES SHOULD ANYONE LEAVE** the relative safety of a locked room until conditions are resolved and occupants are advised to resume normal activity.
6. A campus emergency lockdown drill will be scheduled annually to ensure that all students, faculty and staff are familiar with this emergency procedure.

Procedures for Addressing a Bomb Threat if Received by Telephone:

1. Upon receiving the call, determine if the call was placed from within or outside the building. Call the lead safety officer, front desk security or appropriate floor marshal immediately.

2. Try to determine the time frame associated with the threat. Make a written notation as to when the caller stated the bomb will go off. This information will assist in determining how fast the building must be evacuated.
3. The safety officer or staff or faculty member contacted will be responsible for making the determination to initiate the alarm to evacuate the building. The alarm will be the same alarm used in a fire emergency evacuation. Designated floor marshals will clear the building.
4. The person initiating the response will pull the fire alarm and notify emergency agencies, if possible, by calling 911.
5. Students, faculty and staff will evacuate the building following the same procedures as a fire alarm evacuation. All persons must leave the building. There are no exceptions!
6. Floor marshals will be responsible for evacuating everyone in their respective zones and will check all rooms before leaving the floor.

REPORTING EMERGENCIES:

Albany Campus:

Day Division: To report incidents or emergencies or to find out about conditions on campus contact any one of the following Safety Marshals listed below:

For **first floor** incidents or emergencies, contact:

- George Chakmakas, Director of Admissions... 518-786-0855, ext. 1102 or
- Greg Pouliot, Senior Financial Aid representative... 518-786-0855, ext. 1130 or
- Amber Caruso, Austin School Director... 518-438-7879, ext. 1201.

For **second floor** incidents or emergencies, contact:

- Stephen Quick, Business Information tech, chair... 518-786-0855, ext. 1304 or
- Benjamin Barnard, Digital Media Arts Chair...518-786-0855, ext. 1350.
- Melissa Lurie, Dean Academic Affairs...518-786-0855 X 1350
- Chris Diamantopoulos Executive Assistant...518-786-0855 X 1352

For **third floor** incidents and emergencies, or **any other location on campus**, contact:

- Joe Moltzen, Security Leader, at 518-786-0855, ext. 1429.
- Michelle Constantine Chief Financial Officer...518-786-0855 X 1425

Evening Division: All evening faculty, staff and students should contact the security guard at the front desk in the event of any emergencies. ***The emergency phone number to call is 518-810-5311.***

Weekend Division: All weekend faculty, staff and students should contact the onsite security guard located at the front desk in the admissions department in the event of any emergencies. ***The emergency phone number to call is 518-810-5311.***

REPORTING EMERGENCIES:

Pittsfield Campus:

Day Division: To report incidents or emergencies or to find out about conditions on campus contact any one of the following Safety Marshals listed below:

For **first floor** (lower floor) incidents or emergencies, contact:

- Lori Houlihan, Dean Academic Affairs... 413-499-8618, ext. 224 or

- Sharon Cropsey, Associate Registrar... 413-499-8618, ext. 228
- Carrie Swain, Registrar 413-499-8618 , ext. 221.

For **second floor** incidents or emergencies, contact:

- TJ Elder, School Director 413-499-8618 , ext. 222 or
- Beth Keefner, Admissions Assistant 413-499-8618, ext. 225

Evening Division: All evening faculty, staff and students should contact the security guard at the front desk in the event of any emergencies. ***The emergency phone number to call is***

- Richard Stickney, Business Department Chair 413-499-8618 ext. 261
- Louise DeRagon, Medical Studies Chair 413-499-8618 ext. 259
- Lori Houlihan, Dean Academic Affairs 414-499-8618 ext. 224

Manhattan Campus:

Day Division: To report incidents or emergencies of to find out conditions on campus any one of the following Floor Marshalls.

Russ Bronstein, I.T. Support Technician 212-380-9004 X 1634

Pat Martin , Campus President 212-380-1634 X 1700

Paul Gordon, Vice President Admissions X 1610

Evening Division: Contact the Front desk reception on the campus Floor (16th) or contact Security on the ground floor 212-344-2035

Electronic Messaging

With the sophistication of cell phone technology and the nature of today's communication trends, cell phones and computers have become an important means of rapid communication. In the event that the school finds it necessary to initiate a campus-wide alert e-mail and /or text message "blasts" will be sent to all cell phones or e-mail addresses registered with the school. It is for this reason that all faculty, staff and students are strongly encouraged to provide an electronic means of contact ensuring the largest possible number of contacts to spread critical information. New students will be asked to provide this information during orientation before classes begin and new faculty and staff will be asked to provide information through the Human Resources department. Periodic questionnaires will be distributed to enrolled students to update information throughout the length of their program. The electronic messaging system will perform routine tests to determine the effectiveness of the messaging systems.

Local Television and Radio News

In the event that the school has important information to convey to the campus community regarding weather emergencies, school closings or other circumstance that effect the operation of the campus, information will be broadcast on all major local television and radio news channels. For a listing of these stations, individuals can access the Mildred Elley website or company intranet to obtain the information.

School Standards of Conduct

Empire education attempts to provide a safe, comfortable academic and social environment - and our academic community has a long and cherished tradition of expecting its members to conduct themselves in accordance with the highest standards of ethics and personal behavior. The school does not attempt to define all "student conduct." It relies on students to assume the responsibility and obligation of conducting themselves in a manner compatible with the purpose of the school as an educational institution and the community as a place of residence. In addition to school rules and regulations, all students are subject to the same local, state, and federal laws as non-students and are beneficiaries of the same safeguards and rights as non-students.

The school relies on its faculty and staff to set high standards of conduct as examples for the student body to follow. Committed to the fundamental belief that all people should be treated with dignity and respect, the school has **zero tolerance** for harassment in any context. All members of the college community have the basic right to work and learn in a comfortable environment, free from derogatory remarks, unwelcomed sexual advances, hate speech, racist or sexist comments or any other verbal or physical conduct deemed inappropriate by the school or its administration.

Any and all of this inappropriate behavior is condemned by the school and swift and immediate action will be taken to investigate any credible complaint. If it is determined through proper investigation that disciplinary action is warranted, the school reserves the right to remove the person or persons from campus through expulsion from school or termination of employment. Should additional legal action be sought by the victim, the school and its officials will assist in any way possible to see that justice is served.

Inappropriate Behavior: Definitions

Sexual Assault – Inflicting sexual contact or sexual intrusion upon or engaging in sexual penetration with any person without that person's consent. Such conduct is "without consent" when no clear consent is given; when inflicted through force, threat of force, or coercion; or when inflicted upon a person who is unconscious or otherwise without the physical or mental capacity to consent, e.g., when someone is under the influence of alcohol or drugs.

Sexual Harassment – Either from a supervisor, co-worker, faculty, staff or fellow student, when:

- Submission to such conduct is made either explicitly or implicitly a term of an individual's employment or academic status;
- Submission to or rejection of such conduct by an employee is used as the basis for employment decisions affecting such individual;
- Such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile, offensive work or academic environment;
- Such conduct stereotypes a gender into a degrading, less than desirable status within the work place, creating an intimidating, hostile or offensive environment;
- Any deliberate, unwanted or unwelcome behavior of a sexual nature or sexual stereotyping, whether verbal, non-verbal or physical.

The behavior must satisfy these three (3) legal requirements:

1. Unwanted,
2. Unsolicited (prior behavior and dress are not indications of solicitation), and

3. Deliberate. (It is important to understand that sexual harassment need not be repeated. A one-time-only offense may constitute harassment.)

Sexual Harassment may include, but is not limited to:

- Verbal harassment or abuse
- Subtle pressure for sexual activity
- Sexist remarks about a person's clothing, body or sexual activities
- Unnecessary touching, patting, or pinching
- Leering at a person's body
- Constant brushing against a person's body
- Demanding sexual favors accompanied by implied or overt threats concerning one's job, promotions, performance evaluation, grades, etc.
- Physical assault
- That which comes from a person of either sex against a person of the same or opposite sex, from peers, supervisors, or subordinates, or which is directed toward any of these.

What to Do If You Are Assaulted:

DO: Victims of a sexual assault are encouraged to seek medical help, report the crime, and tell someone such as a counselor, friend, authority figure, parent or a campus security authority.

DO NOT: Medical help is important for your safety after a sexual assault. Until you are examined by a medical professional do not douche, bathe, shower, or throw away or wash clothing or bedding.

Remember, it is critical to preserve medical and criminal evidence for a future judicial case. The decision is up to you to pursue criminal and/or school disciplinary charges. All information taken from a victim of a sexual assault is kept confidential.

Referrals

Any person may refer a person suspected of being a victim of sexual assault to any campus security marshal or any other school official for assistance in contacting the proper authorities and/or summoning medical assistance. For incidents involving sexual harassment victims are encouraged to notify school officials immediately and fill out an incident report. All incidences will be investigated by the appropriate professionals or community based organizations or agencies.

Law Enforcement

Legal options for victims of sexual assault are varied and may include filing a criminal complaint with the Police Department associated with his or her particular campus. The process of filing a sexual assault complaint is highly stressful and seeking legal remedies are complicated. School officials will provide as much assistance and guidance as possible to ensure that the victim is provided the best options to pursue positive remedies or secure the information necessary to pursue whatever action is determined by the victim to be necessary and appropriate.

Emergency Contact Service on Campus

In the event that the school is notified about a student's personal emergency (life threatening or other serious condition requiring immediate attention) unrelated to school operations that notification will be handled by the campus president or department chair for the individual in question.

It is important to note that we cannot guarantee contact with any student at any given time due to the highly mobile nature of the campus environment. However, a good faith effort will be made to contact students to deliver emergency messages.

The school will not become a messaging service for non-emergency situations. Depending on the type of emergency, a message will be delivered to the faculty member or work supervisor asking for the student to be dismissed and to:

1. Immediately contact the source of the message or
2. Immediately proceed to the campus president or Director or department chair for additional information.

Alcohol and Drug Policy

Alcohol is strictly prohibited on campus. Individuals who are in possession of alcoholic beverages on campus are subject to immediate dismissal from school.

Post-secondary students found in possession of illegal drugs on campus will be subject to immediate removal from the program. Empire Education has a **zero tolerance** policy for possession (including drug paraphernalia), use, distribution or sale of illegal drugs. Those students convicted of illegal drug possession of any kind will be immediately dismissed from the program.