



Empire Education Corporation



MEMO

TO: Pittsfield Campus Community
FROM: Allison Schmitt – Campus Director
SUBJECT: Pittsfield Campus Emergency Action Plan 2021-2022
DATE: August 16, 2021

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 Pittsfield Campus Located at 100 West Street in Pittsfield Massachusetts.

Corporate Philosophy

It is the policy of Empire Education Corporation, Mildred Elley College, “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 Location

The Pittsfield Massachusetts Campus is located at 100 West Street in a small, two story commercial building located in the heart of downtown Pittsfield. The School 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.

Campus Access / Parking

The Pittsfield campus is located next to a several-story paid municipal parking garage and street parking is available within comfortable walking distance from the campus. 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. Handicapped parking is available in front of the main entrance of the campus. All parking is provided on a first come first serve basis. Faculty and staff may park free of charge a short walk across West Street at a private lot, and they are required to display an identification sticker on the inside rear window or place other prominent position on the vehicle's glass.

Identification

A key component to campus security is the identification of all persons entering or utilizing the three separate campus facilities throughout the week. 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. 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

The campus is 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.

The fire alarm system is fully automatic and meets 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 campus site coordinator, 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 an announcement will be made and 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. All phones and e-mail addresses registered in the School data base will receive text messaging and/or email 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.
2. Call the lead safety officer, front desk security or appropriate floor marshal immediately.
3. 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.
4. 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.
5. The person initiating the response will pull the fire alarm and notify emergency agencies, if possible, by calling 911.
6. 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!
7. Floor marshals will be responsible for evacuating everyone in their respective zones and will check all rooms before leaving the floor.

REPORTING EMERGENCIES:

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

- Allison Schmitt, Campus Director, at 413-442-0333, ext. 2224

- Danielle Giardina-Marchbanks, Director of Career Services/ Manager of Operations, at 413-442-0333, ext. 2257

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

The School 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.