



**Dorsey School of Business – Training Direct
(Danbury, CT)
2020 Campus Security Report**

**Includes the Drug-Free Campus/Workplace Policy
October 2020**



Dorsey Schools – Training Direct (Danbury, CT) Campus Security Report Includes the Drug-Free Campus/Workplace Policy

Published December 2020

Includes Campus Crime Statistics for
2017, 2018 & 2019 Calendar Years

INTRODUCTION

The Annual Security Report is published in compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act), the Campus Security Enhancement Act and the Violence Against Women Act (VAWA). This Report includes statistics for the previous three years concerning reported crimes that occurred on campus and on public property within, or immediately adjacent to and accessible from college property. The Report also includes institutional policies on campus security policies concerning alcohol and drug use, crime prevention, the reporting of crimes and other matters.

Federal Public Law 102-26 (Jeanne Clery Act) and its extension in Public Law 110-315 of the Higher Education Opportunity Act of 2008 requires that colleges and schools disclose security policies and procedures and campus crime statistics to prospective and enrolled students. Therefore, each year, notification is sent to all enrolled students, faculty, and staff. In addition, it is provided to prospective students prior to starting school and new employees as part of their onboarding process. This Report establishes policies and procedures for all campuses and divisions of Dorsey Schools, and provides crime statistic related to individual Dorsey Schools campus locations. Additional information about the Jeanne Clery Act can be found at the U.S. Department of Education website: <http://ed.gov/admins/lead/safety/campus.html>

Dorsey Schools is committed to maintaining a safe and secure environment for students and staff. This Report is created each year by the VP of Student Financial Services, in collaboration with the Compliance department after surveying each campus for reports of Clery-covered crimes, and making a good faith effort to obtain crime statistics from local law enforcement agencies at each campus. The Campus Operations and Human Resource departments are responsible for ensuring this Report is properly distributed to all current students and employees as well as all prospective students and prospective employees, respectively. This Report provides guidelines and advice that can contribute to this aim and encourage trust and effective communication in our educational community.

Table of Contents

INTRODUCTION.....	2
TABLE OF CONTENTS	3
CAMPUS SAFETY & SECURITY	4
TIMELY WARNING/EMERGENCY RESPONSE AND EVACUATION PLAN.....	4
SEXUAL HARRASMENT AND SEXUAL VIOLENCE POLICY	11
SECURITY & ACCESS TO FACILITIES.....	13
CRIME AWARENESS AND PREVENTION.....	13
CRIME PREVENTION	13
CRIME INCIDENT REPORT	14
REPORTING CRIMES	14
LOCATION OF CRIMES	15
CRIME STATISTICS	15
DEFINITIONS.....	15
DISCIPLINARY REFERRALS	18
UNFOUNDED CRIMES	19
DISCIPLINARY PROCEEDINGS.....	19
DRUG-FREE CAMPUS AND WORKPLACE	
DRUG AND ALCOHOL ABUSE PREVENTION POLICY including SMOKE-FREE AND TOBACCO-FREE POLICY	19
DORSEY SCHOOLS SUBSTANCE ABUSE POLICY AND SANCTIONS.....	19
DESCRIPTION OF HEALTH RISKS ASSOCIATED WITH ALCOHOL ABUSE AND DRUG USE.....	21
FEDERAL SANCTIONS.....	21
STATE LEGAL SANCTIONS	24
LOCAL COUNSELING, TREATMENT, AND REHABILITATION PROGRAMS	24
SMOKE-FREE AND TOBACCO-FREE POLICY	24
REVIEW AND DISTRIBUTION.....	25
CAMPUS CONTACT INFORMATION.....	25
CAMPUS SAFETY AND SECURITY SURVEY	26

CAMPUS SAFETY & SECURITY

The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act), originally known as the Campus Security Act, requires all institutions that participate in Federal Student Financial Aid Programs keep and disclose information about crime on and near their respective campuses.

Dorsey Schools strives to provide a safe, orderly and secure environment conducive to learning. For that reason, Dorsey Schools will respond to any actual or perceived emergency with whatever the necessary course of action the situation mandates. Anyone with information warranting an emergency response must report the circumstances to the Managing Director by coming into the school main office. In order to ensure a safe environment within Dorsey Schools, all police incidents and security or safety problems, including vehicle accidents, injuries, criminal offenses, and suspicious activity should be reported to the Managing Director.

Campuses are not permitted to take retaliatory action against anyone with respect to the implementation of any provision of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act. Notice of the availability and website location of the Annual Campus Security information will be disseminated in the following manner:

- Enrolled student & current employees will receive annual notification of availability of the report, by October 1st
- Prospective students and employees upon request
- Newly enrolled students as part of new student orientation
- New hires as part of their onboarding process

TIMELY WARNING/EMERGENCY RESPONSE and EVACUATION PLAN DESCRIPTION OF STANDARD OPERATING PROCEDURE

Dorsey Schools is dedicated to preparing individuals for promising career opportunities, and as indicated in our mission statement. The unpredictable nature of weather, civil unrest and persons with criminal intent requires the Institution to have a readiness plan. Michigan law under **1974 PA 154 R 408.10623 Employee emergency plans. Rule 623** necessitates that Dorsey Schools maintains an emergency action plan. This is consistent with **20 USC 1001, et. seq.** regulating schools under the Department of Education and **34 CFR 668** regarding Student Assistance General Provisions.

Emergency Response Policy

All Dorsey Schools owned and operated campuses are required to maintain an *Emergency Response and Evacuation Plan* (EREP), which includes plans and instructions to be followed, by campus administration, faculty, staff, students and guests in the event of emergencies and evacuations. The campus managing director is designated as the campus safety authority (CSA), who is responsible for reporting and ensuring the evacuation of the campus in the case of an emergency.

A significant emergency or dangerous situation is any situation occurring on the campus involving an immediate threat to the health or safety of students, visitors or employees. The managing director of each campus makes a determination of the level of threat and the response needed.

Dorsey Schools will respond to any actual or perceived emergency with whatever necessary course of action the situation mandates. Any person with information warranting an emergency response must report the circumstances to school officials. Incidents should be communicated immediately to the individual's instructor or supervisor, campus managing director or senior management. In order to ensure a safe environment within Dorsey Schools, all police incidents and security or safety problems, on campus or immediately adjacent public property, including vehicle accidents, injuries, criminal offenses, and suspicious activity should be reported to the managing director. The individual, for expedience, may directly call 911 to initiate a public safety response. The campus will maintain a crime and incident log for the current 60 days, updated within two days of a reported event. This log is available on inquiry to the managing director of each campus. An OSHA manual is in each lab and can be used as a resource when needed.

Emergency Notification: If there is an immediate threat occurring on campus to the health or safety of students or employees, an institution must follow its emergency notification procedures. An immediate *emergency notification* shall be issued to alert the campus population that a significant emergency or dangerous situation poses an immediate threat to the health or safety of visitors, students or staff on campus. The institution will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency. Emergency notification shall describe the threat and direct individuals to evacuate, shelter in place or

take other specific action. This shall be authorized by the managing director or their designee.

Specific actions for an **Emergency Notification** include:

- Confirm that there is a significant emergency or dangerous situation.
- Determine the appropriate segment or segments of the campus community to receive a notification.
- Determine the content of the notification
 - Campus or workplace violence or external threat - lockdown
 - Building hazard (fire, chemical spill, structure collapse) –evacuate
 - Extreme Weather (storm, tornado, earthquake)– shelter-in- place
- Initiate the notification system for appropriate populations

The Institution’s emergency notification procedures eliminate the need to issue a duplicate timely warning based on the same circumstances; however, the Institution must provide adequate follow-up information to the community as needed.

Timely Warning: In compliance with 40002(a)(20) of the Violence Against Women Act of 1994 (42 U.S.C. 13925(a)(20)), the Institution will report crimes to the campus community that are reported to campus security authorities as identified under the institution’s statement of current campus policies or that of local police agencies, when considered by the institution to represent a threat to students and employees to aid in the prevention of similar crimes. The report will be made in a timely manner that withholds as confidential the names and other identifying information of victims. A *timely warning* is issued to relevant members of the campus community when there is a continued threat that, in the judgment of management, should be brought to the attention of the campus population to aid in the prevention of similar crimes or health issues. The warning may include information such as the date, time, and nature of the threat. A *timely warning* may only be withheld if the alert would compromise efforts to contain the emergency. The institution will, without delay, and taking into account the safety of the community, determine the content of the warning and initiate the timely warning notification system, unless initiating such a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the situation. Timely warning shall describe the threat and direct individuals take specific action to aid in the prevention of similar crimes or health issues. This shall be authorized by the managing director or their designee.

Specific actions for a **Timely Warning** include:

- Confirm that there is a continuation of a significant dangerous situation.
- Determine the appropriate segment or segments of the campus community to receive a timely warning that a situation continues to pose a risk.
- Determine the content of the timely warning including the specific action suggested to aid in prevention.
- Initiate the timely warning system of notification.
 - Email alert
 - Posted notice
 - Blackboard system

Emergency Action and Procedures BUILDING EVACUATION

This action is taken after the decision is made in the event that it is unsafe to remain in the building. Evacuation may be needed when there is smoke or fire, a natural or man-made disaster, a structure collapse or a chemical, biological, nuclear or radiation release that occurs on or in proximity of the school and directly effects the campus population.

Procedure

1. Managing director or designee immediately announces the evacuation and initiates the procedure developed for that location
2. Directs public safety notification via 9-1-1 or activates building fire alarm.
3. Directs visitors, students and staff to immediately vacate to the pre-designated “rally-point” for that location. ALL building occupants should reach safety within three minutes of the alarm. Teachers are to bring student rosters and take attendance at the assembly area to account for all students.

Do not take time to gather your belongings. Do not delay! Even a few seconds of exposure to certain elements can be deadly. Calmly follow directions of staff in evacuating the scene – but do not leave the campus until staff has accounted for you!

Emergency Exits

Since there is always the possibility of the need to evacuate the buildings, a system of illuminated EXIT signs has been installed for the protection of staff, students and visitors. Occupants should evacuate through the nearest (less than 150 ft.) marked exit. The locations of these fire exits are posted within each classroom. Building occupants should take a moment to familiarize them

self with the closest emergency exit. In the event that an evacuation is necessary, students and staff will be notified through an announcement and/or the fire alarm.

1. Building occupants should choose to escape the danger rather than combat the problem. For example, you should **never try to use a fire extinguisher over reaching safety**. Look to your own safety, but assist others if your own life is not placed in jeopardy to do so.
2. All fires, which are extinguished by school personnel, regardless of size, require fire department response for investigation and confirmation that the fire is out.
3. The managing director or designee, if not placed in jeopardy, shall physically inspect all classroom/lab and staff areas as people exit to ensure all known occupants have evacuated.
4. Teachers will take attendance to account for all students. Managers will account for all staff and visitors. Missing building occupants are to be reported to the managing director and public safety providers. **NOTE: No individual should leave the campus until all building occupants have been accounted for.**
5. Once assembled, teachers, students and staff are to stay in place until further instructions are given. Never send students home before the end of the regular school day unless instructed by the managing director.
6. Once public safety has determined the threat no longer exists the managing director or designee immediately announces the “all clear” and initiates the post-incident procedure developed for that location
7. When time permits, the managing director shall notify the campus support center of the situation.
8. The managing director shall consult the campus support center to determine if school activities will resume or be dismissed for the day.
9. All staff, students and visitors shall cooperate with public safety and school officials in providing witness accounts and other necessary information in the investigation of the event.
10. The managing director shall record all pertinent information on the Dorsey incident report form and submit this to the campus support center within two days of the event.
11. If the event was the result of an act of arson the managing director shall record all pertinent information on the Clery Act report form and submit this to the campus support center office within two days of the event.

SHELTER IN PLACE

This action is taken when it is determined that a greater level of protection is provided to students, staff and visitors by remaining within the building. Examples include tornado or severe weather activity, a dangerous wild animal in the area, or similar situation in an area surrounding the campus where being outdoors poses a greater hazard.

Emergency Alert Systems

Some units of county and city government in Michigan operate an Emergency Operations Center, which can send emergency alerts via cell phone or email. Managing Directors of each campus are encouraged to reach out to their local government bodies and subscribe to these alerts if they are available. All safety designees are encouraged to subscribe to applications on their phone for emergency alerts, such as FEMA, Code Red, and Everbridge.

The Outdoor Warning Siren System is meant to alert those people outdoors of an immediate threat entering their community. In most instances, the system is used for severe weather conditions. Always seek immediate indoor shelter when the system sounds. If electricity has not been disrupted, you should refer to local television or radio stations regarding the nature of the alert and instructions for safety.

The Outdoor Warning Siren System may be activated by the county EOC for the following severe weather conditions:

- Tornado Warning issued by the National Weather Service(NWS)
- Tornado / Funnel Cloud Sighting verified by a reputable source
- Severe Thunderstorm accompanied by winds of 70 mph or more issued by the NWS
- Other incidents that require immediate alerting to the public, such as hazardous material spill or terrorist attack.
- The outdoor warning system is tested the first Saturday of each month at 1:00 pm by sounding the sirens.

Procedure

1. The local office of emergency management may activate the disaster/tornado sirens for the affected area. A severe weather watch may be issued by the NWS. These may also be broadcast by local news outlets.
2. Managing director or designee considers the available notification/alert information and determines the need to take action.
3. Managing director or designee immediately communicates the “shelter-in-place” advisory and initiates the procedure developed for that location.

4. In event of a tornado, direct campus occupants to a position of safety. **MOVE QUICKLY! Do not waste time to gather your belongings!**
 - a. Seek a small interior room or hallway on the lowest floor possible
 - b. Stay away from doors, windows, and outside walls
 - c. Stay in the center of the room, and avoid corners because they attract debris
 - d. Rooms constructed with reinforced concrete, brick or block with no windows and a heavy concrete floor or roof system overhead
 - e. *Avoid* auditoriums, cafeterias and common office areas that have flat, wide-span roofs.
5. In the event of a chemical or biological release in proximity to the campus, staff secures individual classrooms and assists completing procedures as needed:
 - Close all exterior doors and windows. If necessary, seal gaps under doors and windows with wet towels or duct tape.
 - Shut classroom doors and windows. If available, seal exterior windows and air vents with aluminum foil or plastic wrap
 - Turn off thermostats and air systems
 - Turn off sources of ignition, such as pilot lights and other electronics.

Any affected areas will not be reopened until the local department or appropriate agency provides clearance and managing director gives authorization to do so.

6. When time permits, the managing director shall notify the campus support center of the situation.
7. Building occupants shall remain in the building until it is determined by the proper authority that it is safe to leave.
NOTE: No individual should leave the campus until all building occupants have been accounted for and it has been determined it is safe to leave the building.
8. Once the outside agency calls an “All Clear,” the managing director shall consult the campus support center to determine if school activities will resume or be dismissed for the day. Never send students home before the end of the regular school day unless instructed by the managing director. No student should be released until safety is assured.
9. The managing director shall record all pertinent information on the Dorsey incident report form and submit this to the campus support center within two days of the event.
10. The Federal Emergency Management Agency offers business readiness information at www.ready.gov/business, which includes resources for sheltering preparations and disaster supplies. Campus managers should consider keeping minimal supplies on hand for these events.

LOCK DOWN

This action is taken when threat of campus violence or gunfire is identified, or as directed by law enforcement when it is necessary to prevent perpetrator(s) from entering occupied areas. During Lock Down, students remain as quiet as possible while hiding in a place of secured shelter, such as a locked classroom or other designated location, out of line of sight from windows at all times.

Procedure

1. Managing director or designee immediately announces the lockdown and initiates the lockdown procedure developed for that location.
2. Directs public safety notification via 9-1-1.
3. Directs the entry doors to the campus are locked (if not endangering the individual).
4. In the event an attacker gains entry, remember **RUN-HIDE-FIGHT**. If escape is possible, individuals should always try to **run** from the attacker. Look to your own safety and only assist others if your own life is not placed in jeopardy to do so. If a panicked co-worker or student is “frozen” in place, you may have to leave them behind. Find a place of opportunity to **hide** such as under a working station or in a closet. If cornered, be prepared to **fight** for your life!
5. Directs the doors to each classroom/lab are locked or barricaded.
6. Directs students and staff to remain quiet and out of sight from windows. Do not evacuate the building if an active shooter is suspected in the building - even if the fire alarm rings. Remain secure until further instructed.
7. Teachers instruct students to lie on floor, lock or barricade doors and close any shades or blinds (if safe to do so). Stay hidden until found by police or the “all clear” has been given.

Do not take time to gather your belongings. Do not delay! Even a few seconds of exposure can be deadly. Do not evacuate the building if a shooter is involved- even if the fire alarm rings. Remain secure until further instructed by the managing director or law enforcement.

When law enforcement arrives – do not “pop-up” from your hiding place. Calmly follow directions of the public safety personnel in evacuating the scene – but do not leave the campus until staff has accounted for all building occupants.

8. Teachers will take attendance to account for all students. Managers will account for all staff.
9. When time permits, the managing director shall notify the campus support center of the situation.
10. All staff, students and visitors shall cooperate with public safety and school officials in providing witness accounts and other necessary information in the investigation of the event.
11. Once public safety has determined the threat no longer exists the managing director or designee immediately announces the “all clear” and initiates the post-lockdown procedure developed for that location
12. The managing director shall consult the campus support center to determine if school activities will resume or be dismissed for the day.
13. The managing director shall record all pertinent information on the Clery Act report form and submit this to the campus support center within two days of the event.

Specific Emergency Actions

No action plan can be all-inclusive. Since there is always the possibility of an unforeseen emergency, the campus should have plans in place to deal with other situations not listed above. For example, what to do when a staff member or student suddenly becomes ill or injured, discovery of a suspicious package or specific bomb threat, or the need to summon local public safety agencies. Emergency contact numbers should be posted with the campus address clearly visible so that callers can properly direct public safety to the location.

MEDICAL EMERGENCY

This action is taken in the event of sudden illness or injury presenting in a member of the staff, students or visitors.

Procedure

1. Alert the managing director of the situation.
2. Managing director or designee directs public safety notification via 9-1-1.
3. If staff trained in first aid is readily available, they may render aid until public safety arrives. This staff should not provide medical opinion or advice.
4. Managing director or designee shall meet, or direct others to meet, public safety personnel and direct them to the victim.
5. The managing director shall record all pertinent information on the Dorsey incident report form and submit this to the campus support center within two days of the event.

BOMB THREAT

This action is taken in response to a specific bomb threat initiated towards the campus upon receipt of a threatening phone call.

Procedure

1. The person receiving the call attempts to keep the caller on the telephone as long as possible and alerts someone else to contact managing director and/or Police Department at **911**. The person receiving the call is to stay calm and speak calmly. They must listen closely to the voice of the caller to determine the caller’s age, sex, accent, speech impediment etc. In addition, they must listen for background noise such as a payphone, schoolyard, busy traffic, railroad cars, PA systems etc.

The following information should be elicited from the caller, if possible:

- **Where is the specific location of the explosive device**
 - **When is it set to explode**
 - **What could make it explode**
 - **What type of explosive or device**
 - **What is the reason for the threat**
 - **The person’s identity / call back number**
 - **What can be done to change their mind about setting off the device**
2. If an unattended or suspicious package is discovered, the managing director shall be notified immediately.
 3. **NO CELL PHONE USE IS ALLOWED** – this can activate an explosive device!
 4. Managing director or designee considers the available information and determines the seriousness of the threat and the need to take action.
 5. Managing director or designee shall call**911**.
 6. If indicated, the managing director or designee immediately announces the bomb threat and moves staff, students and visitors to a place of safety following the building evacuation procedure listed above.
 7. **NO ONE SHOULD ATTEMPT TO MOVE OR EXAMINE A SUSPECTED EXPLOSIVE DEVICE.**

8. Once the outside agency calls an “All Clear,” the managing director shall consult the campus support center Office to determine if school activities will resume or be dismissed for the day.

Educating New Students and Employees

Michigan’s DEPARTMENT OF LICENSING AND REGULATORY AFFAIRS, GENERAL INDUSTRY SAFETY STANDARDS, by sections 16 and 21 of **Act No. 154 of the Public Acts of 1974**, as amended, PART 1. GENERAL PROVISIONS, **R 408.10011**. Employer responsibilities. Rule 11. Set forth, “An employer shall comply with all of the following: (a) Provide training to each newly assigned employee regarding the operating procedures, hazards, and safeguards of the job.” **34 CFR 668.46**, CODE OF FEDERAL REGULATIONS, Title 34 – Education. Vol 3 Chapter VI - OFFICE OF POSTSECONDARY EDUCATION, DEPARTMENT OF EDUCATION, **Subpart D—Institutional and Financial Assistance Information for Students. §668.46 Institutional security policies and crime statistics. (b)(5) and (6)** States the following:

(b) *Annual security report.* An institution must prepare an annual security report that contains, at a minimum, the following information:

- (5) A description of the type and frequency of **programs designed to inform students and employees about campus security procedures and practices** and to encourage students and employees to be responsible for their own security and the security of others.
- (6) A description of **programs designed to inform students and employees about the prevention of crimes.**

Procedure

1. During orientation, individuals shall be directed to the location of the campus safety policy.
2. The managing director or designee shall instruct the individual to any *campus specific* policy or requirement regarding the reporting or response to crime or other campus emergency.
3. The managing director or designee shall disseminate any updates or changes to this policy to all current students and staff within 5 days of the change.

Emergency Response and Evacuation Plan – Practice Drills

34 CFR 668.46, CODE OF FEDERAL REGULATIONS, Title 34 – Education. Vol 3 Chapter VI - OFFICE OF POSTSECONDARY EDUCATION, DEPARTMENT OF EDUCATION, **Subpart D—Institutional and Financial Assistance Information for Students. §668.46 Institutional security policies and crime statistics. (g)(6)(i - iii)**. States the following:

(g) *Emergency response and evacuation procedures.* An institution must include a statement of policy regarding its emergency response and evacuation procedures in the annual security report. This statement must include—

- (6) The institution's procedures to test the emergency response and evacuation procedures on at least an annual basis, including—
 - (i) Tests that may be announced or unannounced;
 - (ii) Publicizing its emergency response and evacuation procedures in conjunction with at least one test per calendar year; and
 - (iii) Documenting, for each test, a description of the exercise, the date, time, and whether it was announced or unannounced.

Procedure

1. The *Emergency Response and Evacuation Procedure* (EREP) shall be tested as a planned/announced or unplanned/alarm exercise at least twice annually. The test exercises may be any combination of building evacuation (fire, toxic exposure, and armed assailant), lockdown (dangerous perpetrator) or shelter-in-place (tornado) exercise.
2. The managing director or designee immediately announces the “alarm” and initiates the procedure developed for that situation.
3. The exercise is documented on the proper form to include a description of the exercise, the date, time, the time taken to successfully evacuate or achieve safety and whether it was announced or unannounced. Exercise reports are maintained in the campus safety log.

LOCAL EMERGENCY AND AGENCY PHONE NUMBERS			
POLICE / FIRE DEPARTMENT EMERGENCY NUMBER IN ALL AREAS – CALL 911			
Location	Police	Fire	Animal Control
EMERGENCY	9-1-1	9-1-1	9-1-1
Dearborn	(313) 943-2241	(313) 943-2242	(313) 791-3497

Dorsey Schools 2020 Campus Security Report and Drug-Free Campus/Workplace Policy

Madison Heights	(248) 585-2100	(248) 588-3605	(248) 837-2784
Pontiac	(248) 858-4950	(248) 758-3000	(248) 858-0550
Roseville	(916) 774-5000	(586) 778-1360	(916) 774-5090
Saginaw	(989) 759-1236	(989) 399-1311	(989) 797-4500
Wayne	(734) 721-1414	(734) 722-1111	(734) 721-1643
Woodhaven	(734) 676-7337	(734) 675-4918	(734) 675-4008
Michigan State Police	(866)-500-0017		
Oakland County Sheriff	(248) 437-5600	Poison Control Center:	(800) 222-1222
Macomb Co Sheriff	(586) 469-5151		
Wayne County Sheriff	(734) 721-2222		
Saginaw Co Sheriff	(989) 790-5456	Amer Red Cross-SE Mich:	(313) 833-4440
FBI – Detroit Field Office	(313) 965-2323	Amer Red Cross-Saginaw:	(989) 754-8181

Fire Drill and Fire Extinguisher Policy

OVERVIEW:

It is the intent of Dorsey Schools to promote compliant organizational behavior by providing guidelines, which communicate these expectations to appropriate employees. This Fire Drill and Fire Extinguisher policy applies to all campuses of Dorsey Schools and Dorsey School of Beauty.

POLICY:

Managing Directors shall supervise mandatory school evacuation at least twice per year; one fire drill is to be planned, and one fire drill is to be unannounced. Managing Directors must become familiar with and follow procedures as outlined in the Campus Safety Plan (attached). This plan is saved in the Policy & Procedures drive on the Dorsey's network. At the conclusion of each fire drill, the "Fire/Evacuation Drill Observers Report" must be completed, with the original being maintained at the campus and a copy being forwarded to the campus support center Office.

Fire Extinguishers

Fire extinguishers shall be maintained as part of the physical plant according to municipal fire codes. Attention should be paid to the expiration date of each fire extinguisher and a visual check for any damage must be conducted monthly to ensure optimal performance should the need for use occur. Specifically, the following items on each extinguisher shall be checked:

1. Check the gauge to ensure the proper range (indicated by the green shaded are); there by evidencing no leakage or expansion of the propellant has occurred.
2. Check the locking pin and plastic tamper indicator to ensure they are in place and have not been removed.
3. Check the annual inspection tag to ensure it has not been removed.
4. Check the hose to ensure that there are no cracks and no foreign objects have been inserted into the nozzle or opening.
5. Check the cylinder body to ensure that no visual damage, rust, or corrosion has occurred. Check the weight and balance of the cylinder (by hefting) to ensure that the extinguishing agent has not compacted at the bottom.

The following items concerning the mounting of the extinguisher shall be checked:

1. Check that the extinguisher is in its proper location.
2. Check to ensure operating instructions are facing outward.
3. Check to ensure the extinguisher is free from obstructions and allowed access to the extinguisher within 36 inches.
4. Any extinguisher found in an unsafe condition shall be immediately replaced until maintenance action can be performed on the extinguisher. A temporary replacement extinguisher of the same class and type as required shall be installed to provide adequate protection.

INTERPRETATION OF THIS POLICY

Questions about this policy must be directed to your direct supervisor and/or the campus support center Director of Compliance. This policy shall be interpreted and administered by a Vice President of Operations and/or the President of Dorsey Schools, who shall have the authority to interpret, implement, modify or restate this policy and further define terms used in this policy.

SEXUAL HARASSMENT AND SEXUAL VIOLENCE POLICY

INTRODUCTION

It is the policy of Dorsey School of Business, Inc. to provide a working and learning environment free from sexual harassment and sexual violence. In accordance with state and federal law, sexual harassment or sexual violence by members of the school community against members of the school community is strictly not allowed. Sexual harassment or sexual violence by others against members of the school community should be reported immediately for suitable action.

SCOPE

This policy encompasses the operation of the Schools' educational programs and activities occurring on campus, at externship sites, during culinary and other school-related events, and on public property immediately adjacent to Dorsey Schools including parking lots, sidewalks and streets. This also encompasses the work environment of all Dorsey personnel. Dorsey Schools is committed to ensuring that this zero-tolerance policy is effectively observed in all of the Schools' endeavors.

Title IX of the 1972 Higher Education Act (20 U.S.C. 1092) applies to schools, colleges and universities that receive any amount of federal funding. Title IX allows the U.S. Department of Education to investigate complaints, order remedies, and withhold funding from educational institutions in violation of sexual harassment under the Act. Enforcement of Title IX is administered by the Department of Education's Office of Civil Rights. The Violence Against Women Reauthorization Act of 2013 amended the Clery Act (34 CFR §688.46) to further hold schools responsible for providing awareness and prevention campaigns and reporting crimes related to sexual assault, domestic violence, dating violence, and stalking. Enforcement of the Clery Act is administered by the Department of Justice through local and state law enforcement agencies.

Definitions

Sexual harassment- Any unwanted and unwelcome behavior of a sexual nature that interferes with one's education or right to participate in school activities. Some examples include: "discussing sexual activities; telling off-color jokes; unnecessary touching; commenting on physical attributes; displaying sexually suggestive pictures; using demeaning or inappropriate terms, such as "Babe"; using indecent gestures; sabotaging the victim's work; engaging in hostile physical conduct; granting job favors to those who participate in consensual sexual activity; using crude and offensive language." ⁱ

Sexual Violence- Any form of sexual conduct, which goes beyond harassment. For example, the act of pulling off someone's clothing or engaging in sexual contact on another person would be considered sexual assault/violence.

Sex Offense- Any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent. ⁱⁱ

Fondling—The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity. ⁱⁱ

Rape- The penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim. ⁱⁱ

Incest—Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law. ⁱⁱ

Statutory Rape—Sexual intercourse with a person who is under the statutory age of consent. ⁱⁱ

Aggravated Assault- An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon, or by means likely to produce death or great bodily harm. (It is not necessary that injury result from an aggravated assault when a gun, knife, or other weapon is used which could, and probably would, result in serious personal injury if the crime were successfully completed.) ⁱⁱ

Domestic Violence - A felony or misdemeanor crime of violence committed by a current or former spouse or intimate partner of the victim; by a person with whom the victim shares a child in common; by a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner; by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred. ⁱⁱⁱ

Dating Violence- Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim that includes, but is not limited to, sexual or physical abuse or the threat of such abuse. ⁱⁱⁱ

Date Rape- Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim that meets the definition of rape, fondling, incest, or statutory rape as used in the FBI's UCR program. ⁱⁱⁱ

Stalking- Engaging in any course of two or more acts directed at a specific person, including, but not limited to, acts in which the stalker directly indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property that would cause a reasonable person to fear for the person's safety or the safety of others; or suffer substantial emotional distress. ⁱⁱⁱ

Risk Reduction

Dorsey Schools is committed to providing primary prevention and awareness information for all students and employees, that provides initiatives, and strategies that are intended to stop dating violence, domestic violence, sexual assault, and stalking before they occur. Information on these campaigns is provided during orientation, and/or the hiring process, and posted throughout the campus.

Risk reduction options are designed to decrease perpetration and bystander inaction, and to increase empowerment for potential victims in order to promote safety and to help individuals and communities address conditions that facilitate violence. Personal safety and situational awareness of suspicious activity and unwarranted advances are the daily responsibility of every individual. Campus security is ultimately the responsibility of every Dorsey employee and student. Any person with information of sexual harassment incidents, criminal offenses, and suspicious activity must report the circumstances to school officials. These occurrences should be communicated immediately to the individual's instructor or supervisor, campus Managing Director or Senior Management.

Protection from Retaliation

Dorsey Schools is committed to ensuring the continued safety of persons making reports of sexual harassment or sexual violence. Investigations will be conducted in a manner to promote the victim's safety. Dorsey Schools will take reasonable steps to protect against retaliation from making a complaint. Dorsey Schools will preserve as confidential any accommodations or protective measures provided to the victim, to the extent that maintaining such confidentiality would not impair the ability of the institution to provide the accommodations or protective measures.

Federal Law prohibits an HEA institution, or an officer, employee, or agent of the school, from any action to retaliate, intimidate, threaten, coerce, or otherwise discriminate against any individual for exercising their rights or responsibilities under any provision of this policy.

The following represents Dorsey Schools policy in this regard:

- Dorsey Schools has a strict no tolerance policy of sexual harassment and/or sexual violence.
- Dorsey Schools will provide prompt and equitable resolution of any student, employee or third party victim of sexual harassment and/or sexual violence.
- Resolution of sexual harassment and/or sexual violence complaints will include at a minimum, assurance of a thorough investigation, reasonable protection against retaliation and further attack. Dorsey Schools will provide written information, as requested, about existing counseling, health, mental health victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available for victims, in the community.
- Discipline of *confirmed* sexual harassment and/or sexual violence will follow the Dorsey Schools established process for disciplinary procedure hearings, and may include police notification or the filing of sexual violence charges as the situation dictates.
- The Vice President of Education and Career Services has been designated to coordinate Dorsey School's efforts to comply with and carry out its responsibilities under Title IX.

Process for Filing a Complaint of Sexual Harassment and/or Sexual Violence:

- Informal, confidential and formal complaints should be communicated immediately to the individual's instructor or supervisor, campus Managing Director, or directly to Dorsey School hotline (866-526-1053) to remain anonymous.
- Complaints must provide detailed factual information regarding the alleged event and include, at minimum, the campus/location, name of those involved, date(s) of occurrence, a written description of the complaint, and the resolution sought.
- Formal written complaints should be communicated to: Dorsey School of Business, Inc.

Vice President of Education and Career Services 31799 John R Rd.

Madison Heights, Michigan 48071 248-585-1195 (confidential fax no.) dorseyhumanresources@dorsey.edu

i http://www.dotcr.ost.dot.gov/Documents/complaint/Preventing_Sexual_Harassment.htm

ii definitions used for reporting the crimes listed in 34 CFR §668.46, in accordance with the Federal Bureau of Investigation's Uniform Crime Reporting (UCR) Program

iii definitions used for reporting the crimes listed in 34 CFR §668.46, in accordance with the Violence Against Women Reauthorization Act of 2013:

SECURITY & ACCESS TO FACILITIES

- Each campus limits access to all campus facilities to authorized personnel, students, and visitors. Unauthorized persons will be considered “trespassers”.
- Adequate lighting is provided at all campus locations, especially in outside areas.
- Persons assigned as the designated Campus Safety Officers at each campus, represent the campus and are instructed to enforce campus security policies.
- Assigned campus safety personnel are defined as campus officials. Students and employees should report criminal offenses, or suspected offenses to campus safety officials or campus officials.
- The assigned Campus Safety Officers do not have power of arrests, unless such personnel possess valid certification as a law enforcement officer, peace officer, or are authorized to act in such a capacity by way of official authority granted by a court of state regulatory agency.
- These safety officials have the authority to evict unauthorized persons from the campus premises and will notify local authorities of all actual or suspected criminal activities, including trespassing.
- The campus maintains its relationship with local police through normal communications and collection of annual statistical information. In addition, the campus works with local law enforcements as necessary to report or investigate crimes.

CRIME AWARENESS & PREVENTION

- All new campus employees and students are instructed on crime awareness during orientation, including the description of campus security measures and procedures for reporting any criminal activity or emergency.
- Students are required to follow campus security guidelines for their own personal and property safety, and are encouraged to report any suspicious activity.
- Prospective/current students and employees are provided with a notification on acquiring the complete policies and procedures package from the campus from the residential campus location. This information on crime awareness is readily available upon request, and will be updated and redistributed to all existing students and staff on an annual basis.
- Students performing externship or clinical practice off-campus are expected to practice safety and security procedures as if the site were an extension of the campus.

CRIME PREVENTION

Often people contribute to crimes of opportunity by needlessly placing themselves or their property at risk. Prevention efforts can be effective in reducing the opportunities for criminal activity. The following list is a compilation of tips devoted to crime prevention:

- Do not prop open campus doors.
- Do not leave personal property unattended.
- Report suspicious individuals to security.
- Keep your room locked at all times, as appropriate
- At night, always walk in groups of at least two.
- Stay on main walkways.
- Remove valuables from your car and lock it.
- Engrave your valuables.
- Attend school-sponsored programs led by law enforcement officials.
- Always carry your picture ID.
- Be aware of your surroundings and what is going on around you.

If you assume responsibility for your own safety first and encourage others to do the same, the opportunities for crime are drastically reduced.

The complete Campus Safety Plan is located on at http://www.dorsey.edu/cmsAdmin/uploads/DS1502-Campus-Safety-Plan-5-2012_001.pdf. A paper copy is available upon request to the Managing Director or employee supervisor at any Dorsey Schools location.

CRIME INCIDENT REPORT

At the campus a confidential Crime Incident Report form is used to record, by the date the crime was reported, any crime that occurred on campus. Any changes to designated Campus Safety Officer must be forwarded to the VP of Student Finance, so that each campus' report contains the most accurate information.

The completed form should include:

- Date of form completed
- Incident report date
- Date/time of the crime
- Nature/type of the crime/complaint
- General location of crime
- Disposition of complaint, if known

A campus may withhold information required above, from inclusion in a timely warning, if there is clear and convincing evidence that the release of the information would:

- Jeopardize an ongoing criminal investigation or the safety of an individual;
- Cause a suspect to flee or evade detection; or
- Result in the destruction of evidence

The campus must report any incident related to assigned Campus Safety officials. The Incident Report form must be completed by the individual and the Campus Safety Officer within one day of the report to campus authority, unless that disclosure is prohibited by law or would jeopardize the confidentiality of the victim. All completed Incident Forms must be forwarded to the Corporate Director of Compliance at athomas@dorsey.edu.

The campus must make the crime incident report for the most recent 60-day period open to public inspection during normal business hours. The campus must make any portion of the report older than 60 days available within two business days of a request for inspection.

REPORTING CRIMES

We encourage anyone who witnessed or has been a victim of a crime to immediately report the incident by dialing 911; we have also provided the name and contact information specific for campus personnel and the police office specific to this campus location.

1. Students and employees should accurately and promptly report criminal acts to the Managing Director at the campus, the designated Campus Safety Officer, a member of the campus' management staff, and/or local police departments.
2. Reporting crimes is on a voluntary, confidential basis.
3. Campus management staff or the designated Campus Safety Officer must immediately notify the campus Managing Director of any instances reported.
4. The Managing Director is responsible to document any criminal acts, as well as reporting crimes to the local authorities as required by law.
5. The institution is required to make timely warnings, to members of the campus community regarding the occurrence of crimes, those that are reported to campus safety officials and those considered by the institution to represent a threat to students and employees. The campus community includes all campus buildings and grounds and all adjacent public property.
6. Timely warnings to the campus community will be issued via text and e-mail as well as posted on any notice boards within the campus.
7. If there is an ongoing investigation of a crime that occurred in, at, or on any of the locations listed above that would be jeopardized, cause the suspect to flee, risk the safety of an individual, or result in the destruction of evidence, the campus may delay the timely warning until any adverse effect is no longer likely to occur.
8. The statistics are collected centrally for each campus and reported to the Director of Compliance on a monthly basis. The Director of Compliance will report the information to the VP Student Finance, who is responsible for submitting annually to the U.S. Department of Education Campus Safety and Security.
9. The annual report should also include the institution's response after a crime is reported (ex. Disciplinary action)

LOCATION OF CRIMES

The Clery Act defines the geographic area for which the college must report crimes specified in the Act, and requires the institution to include a description of this geographic area in its annual security report. Schools must report crimes that occur (1) on campus, (2) on public property within or immediately adjacent to the campus, and (3) in or on non-campus buildings or property that the institution owns or controls. Public property includes the following; All public property including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus. Crime located in private homes or businesses are not included.

CRIME STATISTICS

The federal law requires that schools disclose statistics on specific crimes/offenses that occur on-campus, on non-campus property, or on public property adjacent to or accessible from the campus. For the purposes of the Clery Act, any building that is owned or controlled by the institution, or is located on property that is owned or controlled by the institution, and is within the reasonably contiguous geographic area that makes up the campus is considered an on-campus student facility even if the building itself is owned or controlled by a third party, as classified by the FBI Uniform Crime Report.

Campus specific safety and security survey is attached on the last page of this document, and may be obtained by students and/or employees (current and prospective) at the campus location.

DEFINITIONS for Crimes (as defined by the FBI Uniform Crime Report)

1. **HOMICIDE:** The willful (non-negligent) killing of one human being by another or the killing of another person through gross negligence. In general, (1) any death caused by injuries received in a fight, argument, quarrel, assault, or commission of a crime is considered Murder and Non-Negligent Manslaughter and (2) any death caused by the gross negligence of another is considered Criminal Homicide-Manslaughter by Negligence.
2. **FORCIBLE & NON-FORCIBLE SEX OFFENSES:** Any sexual act directed against another person, forcibly and/or against the person's will; not forcibly or against the person's will when the victim is incapable of giving consent.

Forcible Rape – Rape by Force is defined as the carnal knowledge of a female forcibly and against her will. “Against her will” includes instances in which the victim is incapable of giving consent because of her temporary or permanent mental or physical incapacity (or because of her youth).

Forcible Rape – Attempts to Commit Forcible Rape is defined as assaults or attempts to forcibly rape.

Non-Forcible Rape – Incidents of unlawful, non-forcible sexual intercourse classified as (1) Incest is non-forcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law and (2) Statutory Rape is non-forcible sexual intercourse with a person who is under the statutory age of consent according to state statutes.

Note: By definition, sexual attacks on males are excluded from the rape category and must be classified as assaults or other sex offenses depending on the nature of the crime and the extent of injury.

3. **SIMPLE ASSAULT (Hate Related Bias Crime):** An unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness. Included are offenses such as minor assault, hazing, assault and battery, and injury caused by culpable negligence. As with Aggravated Assault, there are no attempted Simple Assaults.

Simple, Not Aggravated includes all assaults which do not involve the use of a firearm, knife, cutting instrument, or other dangerous weapon and in which the victim did not sustain serious or aggravated injuries Agencies must classify as simple assault such offenses as assault and battery, injury caused by culpable negligence, intimidation, coercion, and all attempts to commit these offenses. In addition, Reporting Agencies must classify the offense as simple assault if the injuries are not serious (abrasions, minor lacerations, or contusions) and require no more than usual first-aid treatment. Under certain circumstances, offenses of disorderly conduct, domestic violence, or affray must be classified as simple assault.

4. AGGRAVATED ASSAULT: An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm. Examples include:

- Firearm includes all assaults in which a firearm of any type is used or is threatened to be used. (Examples: revolvers, automatic pistols, shotguns, rifles, etc.).
- Knife or Cutting Instrument includes assaults wherein weapons are used as cutting or stabbing objects or their use is threatened. (Examples: knives, razors, hatchets, scissors, etc.).
- Other Dangerous Weapon includes assaults resulting from the use or threatened use of any object as a weapon in which serious injury does or could result. (Examples: Mace, pepper spray, clubs, bricks, etc.). Attacks by explosives, acid, lye, poison, scalding, burnings, etc. are also included in this category.
- Hands, Fists, Feet, Etc. – Aggravated Injury includes only the attacks using personal weapons such as hands, arms, feet, fists, and teeth that result in serious or aggravated injury.

Reporting agencies must consider the seriousness of the injury as the primary factor in establishing whether the assault is aggravated or simple. They must classify the assault as aggravated if the person injury is serious, for example, there are broken bones, internal injuries, or stitches required. Often the weapon used or the extent of the injury sustained will be the deciding factor in distinguishing aggravated from simple assault. To classify an assault, consider the following:

1. The type of weapon employed or the use of an object as a weapon
2. The seriousness of the injury
3. The intent of the assailant to cause serious injury

5. ROBBERY: Taking or attempting to take anything of value from the care, custody or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear. Examples include:

- Firearm includes robberies in which any firearm is used as a weapon or employed as a means of force to threaten the victim or put the victim in fear.
- Knife or Cutting Instrument includes robberies in which a knife, broken bottle, razor, ice pick, or other cutting or stabbing instrument is employed as a weapon or as a means of force to threaten the victim or put the victim in fear.
- Other Dangerous Weapon includes robberies in which a club, acid, explosive, brass knuckles, Mace, pepper spray, or other dangerous weapon is employed or its use is threatened.
- Strong-arm – Hands, Fists, Feet, Etc. includes muggings and similar offenses in which only personal weapons such as hands, arms, feet, fists, and teeth are employed or their use is threatened to deprive the victim of possessions.

6. LARCENY/THEFT (Hate Related Bias Crime): The unlawful taking, carrying, leading, or riding away of property from the possession, or constructive possession (where one does not have physical custody or possession, but is in a position to exercise control over a thing), of another person.

Larceny and theft mean the same thing in the UCR Program. Motor vehicle theft is not included and is counted separately because of the great volume of such thefts. Agencies must report local offense classifications such as grand theft, petty larceny, felony larceny, or misdemeanor larceny as larceny-theft. Examples include:

- Pocket-picking – This includes wallets, purses, pockets, etc. If the victim is manhandled or if force beyond simple jostling is used to overcome the resistance of the victim, the offense becomes a strong-arm robbery and must be so classified.
- Purse-snatching – This includes purses, handbags, etc. If more force is used than actually necessary to snatch the purse from the owner, or if the victim resists the theft in any way, then the offense is classified as a strong-arm robbery.
- Shoplifting
- Theft from motor vehicles whether locked or unlocked (Except theft of motor vehicle parts and accessories) *If a theft from a motor vehicle occurs in conjunction with a motor vehicle theft, reporting agencies must classify the incident as a motor vehicle theft.
- Theft of motor vehicle parts and accessories (attached to vehicle)
- Theft of bicycles
- Theft from buildings
- Theft from Coin-Operated Machine or Device

- All other larceny-theft not specifically classified – All thefts which do not fit the definition of the specific categories of larceny listed above. This includes theft of furniture, tools, etc.

7. **BURGLARY:** The unlawful entry (breaking or entering) with intent to commit a felony or theft, breaking and entering with intent to commit a larceny, house-breaking, safecracking, and all attempts at these offenses as burglary. The definition of a structure includes, but is not limited to, any residence, business, campus or classroom, other buildings, public buildings, etc. An incident must meet three conditions to be classified as a Burglary:

- 1) There must be evidence of unlawful entry (trespass). Both Forcible Entry and Unlawful Entry – No Force are counted.
- 2) The Unlawful Entry must occur within a structure, which is defined as having four walls, a roof, and a door.
- 3) The Unlawful Entry into a structure must show evidence that the entry was made in order to commit a felony or theft. If the intent was not to commit a felony or theft, or if the intent cannot be determined, the proper classification is Larceny.

Examples include:

- Forcible Entry is any offense where force of any kind is used to unlawfully enter a structure for the purpose of committing a theft or felony. (Examples: Using tools, breaking windows, master keys, or picks to gain entry). Agencies must also include this category burglary by concealment inside a building followed by exiting the structure.
- Unlawful Entry – No Force is considered when the entry of a structure is achieved by use of an unlocked door or window. The element of trespass to the structure is essential in this category, which includes thefts from open garages, open warehouses, open or unlocked dwellings, and open or unlocked common basement areas in apartment houses where entry is achieved by other than the tenant who has lawful access.
- Attempted Forcible Entry includes those situations where a forcible entry burglary is attempted but not completed. Once the thief is inside a locked structure, the offense becomes a Burglary – Forcible Entry. Agencies must classify attempts to enter an unlocked structure as well as actual trespass to an unlocked structure as Burglary – Unlawful Entry – No Force. Only situations in which a thief has attempted to break into a locked structure are classified as Burglary – Attempted Forcible Entry.

Note: If a forcible or unlawful entry of a building is made to steal a motor vehicle, the reporting agency must count the offense and the value of the vehicle under burglary, not motor vehicle theft.

8. **VANDALISM (Hate Related Bias Crime):** To willfully or maliciously destroy, injure, disfigure, or deface any public or private property, real or personal, without the consent of the owner or person having custody or control by cutting, tearing, breaking, marking, painting, drawing, covering with filth, or any other such means as may be specified by local law. This offense covers a wide range of malicious behavior directed at property, such as cutting auto tires, drawing obscene pictures on public restroom walls, smashing windows, destroying campus records, tipping over gravestones, and defacing library books. Reporting agencies must include attempts to commit any of the above.

9. **MOTOR VEHICLE THEFT:** Motor Vehicle Theft includes the theft or attempted theft of a motor vehicle, which the UCR Program defines as a self-propelled vehicle that runs on land surface and non on rails; for example, sports utility vehicles, automobiles, trucks, buses, motorcycles, motor scooters, all-terrain vehicles, and snowmobiles are classified as motor vehicles. Joyriding should be included as Motor Vehicle Theft.

Note: If a motor vehicle is stolen in conjunction with another offense, each offense must be classified accordingly.

Examples:

- Trucks and Buses include the theft of those vehicles specifically designed (but not necessarily used) to commercially transport people and cargo. Pickup trucks and cargo vans, regardless of their use, are included in this category. The UCR Program considers a self-propelled motor home to be a truck.
- Other Vehicles includes all other motor vehicles that meet the UCR definition such as snowmobiles, motorcycles, motor scooters, trail bikes, mopeds, golf carts, all-terrain vehicles, and motorized wheelchairs. Obviously, all situations cannot be covered, so the classifier's decision must be based on UCR standards and the results of law enforcement investigation.

10. **INTIMIDATION (Hate Related Bias Crime):** To unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack. Intimidation involves an offender making some type of threat to the victim without actually using or displaying a weapon. Such threats can be made in person, over the telephone, or in writing.

11. ARSON: Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property or another, etc.

Include as arson only structural fires determined through investigation to have been willfully or maliciously set. Attempts to burn are included in this offense, but fires of suspicious or unknown origins are not.

Note: If arson is recorded, the campus is responsible for updating the Fire Safety Report to include arson or any other types of fire. Examples include:

- Structural includes single occupancy residential (houses, townhouses, etc.), other residential (apartments, tenements, hotels, etc.), storage (barns, garages, etc.), industrial/manufacturing, other commercial (stores, restaurants, offices, etc.), community/public (churches, jails, campuses, schools, etc.), all other structure (out buildings, monuments, buildings under construction, etc.). Structures are further divided into two subcategories: residential and nonresidential.
- Mobile includes motor vehicles (automobiles, trucks, buses, motorcycles, etc.) and other mobile property (trailers, recreational vehicles, airplanes, boats, etc.).
- Other subcategory encompasses arson of all property not classified as structural or mobile. Willful or malicious burnings of property such as crops, timber, fences, signs, and merchandise stored outside structures are included in this category.

Incidents in which persons are killed as a direct result of arson are classified as both criminal homicides and arson. Similarly, the number of persons severely injured during the commission of arson must be reported as aggravated assaults along with the arson.

12. HATE CRIMES: In general, “hate” or “bias” crime is often defined as unlawful actions designed to frighten or harm an individual because of his/her race, religion, gender, disability, ethnicity, national origin, gender identity or sexual orientation. A hate crime is classified as any occurrence of criminal homicide, sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, arson, larceny-theft, simple assault, intimidation, destruction/damage/vandalism of property, and any other crime involving bodily injury reported to local law enforcement agencies or a campus safety authority, that manifest evidence that the victim was intentionally selected because of the perpetrator’s bias.

An important distinction is required when reporting a hate crime. The mere fact that an offender is biased against a victim’s race, religion, gender, disability, ethnicity, national origin, or sexual orientation is not sufficient to deem the offense a hate crime. Rather, it must be determined that the offender’s criminal act was motivated, in whole or in part, by the offender’s bias.

DISCIPLINARY REFERRALS

The following are the FBI Uniform Crime Report’s definition of crime for which arrests and disciplinary referrals must be reported:

LIQUOR LAW VIOLATIONS: Violations of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession or use of alcoholic beverages (does not include arrests for driving while impaired or under the influence of alcohol).

The campus will report the following in its annual statistics:

- 1 The number of campus violations
- 2 The type of sanction for violations
- 3 The number of arrests
- 4 The number of fatalities

DRUG LAW VIOLATIONS: Violations of state and local laws, specifically those for the unlawful possession, sale, use, growing, manufacturing and making of narcotic drugs.

The campus will report the following in its annual statistics:

- 1 The number of campus violations
- 2 The type of sanction for violations
- 3 The number of arrests
- 4 The number of fatalities

WEAPONS POSSESSION: Defined as a violation of law or ordinances prohibiting the manufacture, sale, purchase,

transportation, possession, concealment or use of firearms. Cutting instruments, explosives, incendiary devices or other deadly weapons are included in this category. If a weapon is utilized during any of the categories above, a separate weapon violation will be recorded in the campus statistics.

UNFOUNDED CRIMES

If a reported crime is investigated by law enforcement authorities and found to be false or baseless, the crime is “unfounded” and is included in the campus statistics. Only sworn or commissioned law enforcement personnel may “unfound” a crime. (This does not include a district attorney who is sworn or commissioned.) Note that the recovery of stolen property, the low value of stolen property, the refusal of the victim to cooperate with the prosecution or the failure to make an arrest does not “unfound” a legitimate offense. Also, the findings of a coroner, court, jury or prosecutor do not “unfound” offenses or attempts that law enforcement investigations establish to be legitimate.

DISCIPLINARY PROCEEDINGS

The Higher Education Opportunity Act (HEOA) requires schools to disclose, upon written request, to the alleged victim of a crime of violence or a non-forcible sex offense, the results of any disciplinary hearing related to the offense conducted by the campus against the student who is the alleged perpetrator of the crime or offense. If the alleged victim is deceased as a result of the crime or offense, the campus must provide the results of the disciplinary hearing to the victim’s next of kin, if so requested.

DRUG-FREE CAMPUS AND WORKPLACE DRUG AND ALCOHOL ABUSE PREVENTION POLICY Including SMOKE-FREE AND TOBACCO-FREE POLICY

The purpose of Dorsey Schools Drug and Alcohol Abuse Prevention Policy is to foster a safe and healthy campus where students, faculty, and staff can work and attend in an environment free of the detrimental effects associated with drug and alcohol abuse. Through the Drug and Alcohol Abuse Prevention Program Dorsey Schools can inform students, faculty, and staff about the health risks associated with substance abuse, the resources available to help cope with substance abuse, and the sanctions imposed by federal, state, and local authorities, as well as our standards with regard to the use or abuse of alcohol and/or controlled substances.

DORSEY SCHOOLS SUBSTANCE ABUSE POLICY AND SANCTIONS

Unauthorized drugs or alcohol is strictly prohibited on school premises. For the safety of fellow students, administrators, clinic clients and prospective patients, students believed to be under the influence of drugs, alcohol, or other substances, which could impair judgment, behaviors, and/or activities, may be required to take a drug test. Dorsey Schools reserves the right to suspend or dismiss any student soliciting illegal drugs.

Dorsey Schools can provide employees and students with information on outside resources available to help with problems related to the misuse of alcohol and all forms of substance abuse for themselves or their family members. Contact the Managing Director for names of appropriate agencies, phone numbers, and additional information.

CONSUMPTION AND POSSESSION OF MARIJUANA

All students, employees, and visitors are on notice that the Michigan Medical Marijuana Act (“MMMA”) conflicts with federal criminal laws governing controlled substances, as well as federal laws requiring institutions receiving federal funds, by grant or contract, to maintain drug-free campuses and workplaces. Dorsey Schools participates in federal grant programs, which would be in jeopardy if those federal laws did not take precedence over state law. Thus, the use, possession, or cultivation of marijuana in any form and for any purpose on Dorsey Schools’ property or premises violates the Dorsey Schools’ “Drug Free Schools Police Statement”. Dorsey Schools will not allow the use, possession, or cultivation of marijuana on its property or premises or in / on Dorsey Schools’ controlled environments, even if a student, employee, or visitor has been properly certified as a medical

marijuana user. Students, employees, and visitors will be asked to dispose of or remove marijuana from Dorsey Schools' property or premises immediately.

Further, as part of a student's program at Dorsey Schools, an externship or clinical experience may be required. The MMMA states that employers are not required to accommodate employees who use medical marijuana; therefore, employers have the right to refuse employment to anyone who fails a drug test. Additionally, the State of Michigan prohibits a person from undertaking any task under the influence of marijuana, when doing so would constitute negligence or professional malpractice, as in many areas of the medical field. As a result, drug testing may be required at any time by a clinical site, externship site, or prospective employer consistent with the laws of the State of Michigan, the requirements of potential employers, and the requirements of any facility where the clinical experience and/or externship participation occurs. Students should be aware that participation in a clinical or externship experience and/or employment depends upon the results of these drug tests. If a drug test(s) prevents a student from obtaining and/or participating in a clinical or externship program, the student may be unable to complete the educational program requirements of Dorsey Schools.

Dorsey Schools prohibits the use of all illegal and illicit drugs by all students and employees while at school or at work. The campus and all associated campus and workplace areas are designated as "Drug-Free". The possession, sale or the furnishing of alcohol or illegal or illicit drugs of any kind on campus is governed by the Student Code of Conduct found in the School Catalog for each Dorsey Schools campus and division location. Students and employees are not allowed to bring alcohol, illicit or illegal drugs of any kind onto school premises, or be under the influence of alcohol, illicit or illegal drugs while on school premises. The National Minimum Drinking Age Act of 1984 required all states to raise their minimum purchase and public possession of alcohol to age 21.

Any student or employee committing any of these violations is subject to disciplinary action imposed by the school. These sanctions may include:

- Mandated counseling with the managing director or employee's supervisor
- Mandated attendance at a local treatment center
- Mandated completion of drug rehabilitation program
- Discharge from employment or expulsion from school

The possession, sale, manufacture or distribution of any controlled substance is illegal under both state and federal laws. In conjunction with the campus safety personnel, the campus utilizes this Drug and Alcohol Abuse Prevention Policy to determine the following:

- 1) The number of drug and alcohol-related violations and fatalities that occur on the campus or as part of any of the campus activities that must be reported to campus officials, and
- 2) The number and type of sanctions that are imposed by the campus as a result of drug and alcohol-related violations and fatalities on the campus or as part of any of the campus activities.

Note: Additional information is available within the Employee Handbook for all Dorsey Schools personnel.

The campus must provide a timely notice to each student who has lost eligibility for any Federal Student Aid grant or loan assistance as a result of penalties in a separate clean, and conspicuous written notice that notifies the student of the loss of eligibility and advises the student of the ways in which to regain eligibility. If the student successfully passes two unannounced drug tests conducted by a drug rehabilitation program that complies with criteria established by the US Department of Education, the student may be eligible to regain eligibility of Federal Student Aid funds.

DESCRIPTION OF HEALTH RISKS ASSOCIATED WITH ALCOHOL ABUSE AND DRUG USE

Alcohol abuse is the leading preventable cause of death in the U.S. at 75,000 deaths per year and abuse of prescription drugs has escalated to as serious a national health problem as the use of illegal drugs. The health risks of alcohol and drug abuse can include nausea, emotional volatility, loss of coordination, visual distortions, impaired memory, sexual dysfunction, loss of consciousness/ increased risk of injuries, violence, fetal damage (in pregnant women), depression, neurologic deficits, hypertension, liver and heart disease, increased heart rate, anxiety, panic attacks, psychosis, addiction, and fatal overdose. Below are some specific risks related to the use of alcohol and illegal drugs:

MARIJUANA - Use can lead to an increase in heart rate of up to 50%, cause disoriented behavior, acute anxiety, and tremendous mood swings. There is potential for long-term physical and psychological damage. Also slows reflexes, reduces mental power, causes forgetfulness and impairs judgment. Personal dangers include possible damage to lungs, reproductive system, and brain functions.

COCAINE - Use can affect the brain in seconds and result in heart or respiratory failure. It can cause hallucinations, convulsions, and possible death. Causes temporary false feelings of superhuman powers, impairing judgment and decision-making abilities. Also causes emotional problems, mood swings, and lack of dependability. Personal dangers include damage to the respiratory and immune systems, malnutrition, seizures, and loss of brain functions.

CRACK - Intensifies effects normally experienced with cocaine and can lead to intense dependency in a short time. The health risks are basically the same associated with other forms of cocaine.

AMPHETAMINES - Use increases heart rate, raises blood pressure, and often causes blurred vision, dizziness, lack of sleep and anxiety. Use of amphetamines can lead to long-term physical problems. Can also cause feelings of being rushed and causes users to push themselves beyond their capacity. Personal dangers range from disruption of family life to serious health problems such as kidney and liver disease.

BARBITURATES: Use can slow mental reflexes, causing danger when mental alertness is required. Personal dangers range from disruption of family life to serious health problems such as kidney and liver disease.

HALLUCINOGENS (PCP, LSD, and ECSTASY): Use can cause the user to hallucinate, thereby distorting what is being said or heard. Also causes sudden changes in behavior that may include attacks on others, loss of concentration, and memory loss long after the dose has worn off.

HEROIN: Use causes total disinterest in safety. Dirty needles and other paraphernalia can spread diseases such as HIV/AIDS. Personal dangers include damage to personal productivity and relationships, and an overdose can cause coma or death. Heroin is always addictive, even in small amounts, and withdrawal is difficult and painful.

ALCOHOL - Use can lead to a false feeling of confidence and control. Liver, brain, heart, and stomach destruction goes on even without apparent symptoms. Use for a period of time often causes dependency and can be fatal. Can also cause loss of concentration and judgment, poor attendance and punctuality, and the inability to manage work or school responsibilities. Personal dangers can range from liver and kidney disease to alcoholism.

Alcohol consumption causes a number of marked changes in behavior. Even low doses significantly impair the judgment and coordination required to drive a car safely, increasing the likelihood, the driver will be involved in an accident. Low-to-moderate doses of alcohol also increase the incidence of a variety of aggressive acts, including spouse and child abuse. Moderate-to-high doses of alcohol cause marked impairments in higher mental functions, severely altering a person's ability to learn and remember information. Very high doses can cause respiratory depression and death. If combined with other depressants of the central nervous system, much lower doses of alcohol will produce the effects just described.

Repeated use of alcohol can lead to dependence. Sudden cessation of alcohol intake is likely to produce withdrawal symptoms, including severe anxiety, tremors, hallucinations, and convulsions. Alcohol withdrawal can be life-threatening. Long-term consumption of large quantities of alcohol, particularly when combined with poor nutrition, can also lead to permanent damage to vital organs such as the brain and the liver. Mothers who drink alcohol during pregnancy may give birth to infants with fetal alcohol syndrome. These infants have irreversible physical abnormalities and mental retardation. In addition, research indicates that children of alcoholic parents are at greater risk of becoming alcoholics than other youngsters.

FEDERAL SANCTIONS

Campuses are required to notify current/perspective students and employees of the federal and state legal sanctions associated with the possession or trafficking of a controlled substance. Penalties for unlawful manufacturing, distribution, and dispensing of controlled substances are provided under the Federal Controlled Substances Act. The penalties are determined by the nature of the drug or other substance, the amount of drug or other substance, the amount of drugs or other substance involved, and the number of offenses.

Federal Trafficking Penalties for Schedules I, II, III, IV, and V				
Available at: http://www.dea.gov/druginfo/ftp3.shtml				
Schedule	Substance/Quantity	Penalty	Substance/Quantity	Penalty
II	Cocaine 500-4999 grams mixture	First Offense: Imprisonment of not less than 5 yrs. and not more than 40 yrs. If death or serious bodily injury,	Cocaine 5 kilograms or more mixture	First Offense: Imprisonment of not less than 10 yrs. and not more than life. If death or serious bodily injury, imprisonment of not less
II	Cocaine Base 28-279 grams mixture		Cocaine Base 280 grams or more mixture	

Dorsey Schools 2020 Campus Security Report and Drug-Free Campus/Workplace Policy

IV	Fentanyl 40-399 grams mixture	imprisonment of not less than 20 yrs. or more than life. Fine of not more than \$5 million if an individual, \$25 million if not an individual. Second Offense: Imprisonment of not less than 10 yrs. and not more than life. If death or serious bodily injury, life imprisonment. Fine of not more than \$8 million if an individual, \$50 million if not an individual.	Fentanyl 400 grams or more mixture	than 20 yrs. or more than life. Fine of not more than \$10 million if an individual, \$50 million if not an individual. Second Offense: Imprisonment of not less than 20 yrs, and not more than life. If death or serious bodily injury, life imprisonment. Fine of not more than \$20 million if an individual, \$75 million if not an individual. 2 or More Prior Offenses: Life imprisonment. Fine of not more than \$20 million if an individual, \$75 million if not an individual.
I	Fentanyl Analogue 10-99 grams mixture		Fentanyl Analogue 100 grams or more mixture	
I	Heroin 100-999 grams mixture		Heroin 1 kilogram or more mixture	
I	LSD 1-9 grams mixture		LSD 10 grams or more mixture	
II	Methamphetamine 5-49 grams pure or 50-499 grams mixture		Methamphetamine 50 grams or more pure or 500 grams or more mixture	
II	PCP 10-99 grams pure or 100-999 grams mixture		PCP 100 grams or more pure or 1 kilogram or more mixture	

Dorsey Schools 2020 Campus Security Report and Drug-Free Campus/Workplace Policy

Substance/Quantity	Penalty
Any Amount Of Other Schedule I & II Substances	First Offense: Imprisonment of not less than 20 yrs. If death or serious bodily injury, not less than 20 yrs. or more than Life. Fine \$1 million if an individual, \$5 million if not an individual. Second Offense: Imprisonment of not more than 30 yrs. If death or serious bodily injury, life imprisonment. Fine \$2 million if an individual, \$10 million if not an individual.
Any Drug Product Containing Gamma Hydroxybutyric Acid	
Flunitrazepam (Schedule IV), 1	
Any Amount Of Other Schedule III Drugs	First Offense: Imprisonment of not more than 10 yrs. If death or serious bodily injury, not more than 15 yrs. Fine not more than \$500,000 if an individual, \$2.5 million if not an individual. Second Offense: Imprisonment of not more than 20 yrs. If death or serious injury, not more than 30 yrs. Fine not more than \$1 million if an individual, \$5 million if not an individual.
Any Amount Of All Other Schedule IV Drugs (other than one gram or more of Flunitrazepam)	First Offense: Imprisonment of not more than 5 yrs. Fine not more than \$250,000 if an individual, \$1 million if not an individual. Second Offense: Imprisonment of not more than 10 yrs. Fine not more than \$500,000 if an individual, \$2 million if other than an individual.
Any Amount Of All Schedule V Drugs	First Offense: Imprisonment of not more than 1 yr. Fine not more than \$100,000 if an individual, \$250,000 if not an individual. Second Offense: Imprisonment of not more than 4 yrs. Fine not more than \$200,000 if an individual, \$500,000 if not an individual.
Federal Trafficking Penalties for Marijuana, Hashish and Hashish Oil, Schedule I Substances	
Marijuana 1,000 kilograms or more marijuana mixture or 1,000 or more marijuana plants	First Offense: Not less than 10 yrs. or more than life. If death or serious bodily injury, not less than 20 yrs., or more than life. Fine not more than \$10 million if an individual, \$50 million if other than an individual. Second Offense: Not less than 20 yrs. or more than life. If death or serious bodily injury, life imprisonment. Fine not more than \$20 million if an individual, \$75 million if other than an individual.
Marijuana 100 to 999 kilograms marijuana mixture or 100 to 999 marijuana plants	First Offense: Not less than 5 yrs. or more than 40 yrs. If death or serious bodily injury, not less than 20 yrs. or more than life. Fine not more than \$5 million if an individual, \$25 million if other than an individual. Second Offense: Not less than 10 yrs. or more than life. If death or serious bodily injury, life imprisonment. Fine not more than \$8 million if an individual, \$50million if other than an individual.
Marijuana 50 to 99 kilograms marijuana mixture, Hashish, More than 10 kilograms Hashish Oil, More than 1 kilogram	First Offense: Not more than 20 yrs. If death or serious bodily injury, not less than 20 yrs. or more than life. Fine \$1 million if an individual, \$5 million if other than an individual. Second Offense: Not more than 30 yrs. If death or serious bodily injury, life imprisonment. Fine \$2 million if an individual, \$10 million if other than an individual.
Marijuana less than 50 kilograms marijuana (but does not include 50 or more marijuana plants regardless of weight) or 1 to 49 marijuana plants Hashish, 10 kilograms or less Hashish Oil, 1 kilogram or less	First Offense: Not more than 5 yrs. Fine not more than \$250,000, \$1 million if other than an individual. Second Offense: Not more than 10 yrs. Fine \$500,000 if an individual, \$2 million if other than individual.

Additional details regarding federal drug trafficking penalties are available through the U.S. Drug Enforcement Administration at

<http://www.dea.gov/druginfo/ftp3.shtml>

STATE LEGAL SANCTIONS

It is Dorsey Schools' policy to comply with the State of Michigan, Connecticut and Ontario, Canada laws regarding the possession, use and sale of alcoholic beverages, including enforcement of underage drinking. Campuses are required to notify current/perspective students and employees of the state legal sanctions associated with the possession or trafficking of a controlled substance.

The State of Michigan and the State of Connecticut both have a broad range of penalties for the use and distribution of controlled substances. These penalties range from fines to imprisonment and seizure of property. Crimes pertaining to the use and/or distribution of controlled substances can be prosecuted along a varying scale of seriousness, ranging from misdemeanor to felony. Full details on all crimes relating to controlled substances, their use and distribution can be found in the Michigan Code section 333.7212, 7214, 7216, 7218, and 7220 and in the Connecticut Consumer Protection Code Sections 21a-243-7 through 21a-243-11. Full details on all crimes relating to controlled substances in Canada can be found in the Controlled Drugs and Substances Act (S.C. 1996, c. 19) as published by the Government of Canada.

COUNSELING, TREATMENT AND REHABILITATION PROGRAMS

Campuses are required to notify current/perspective students and employees of local counseling, treatments, and rehabilitation programs for possession and trafficking of a controlled substance.

Students and employees are encouraged to seek assistance for substance abuse problems. Dorsey Schools offers confidential assistance to students and staff. Contact the Managing Director of the school or your supervisor for assistance. There are many programs that can provide help and support. Many health insurance plans include drug, alcohol and mental health services. If you live in Canada and need help in finding a treatment center, you can access a list of treatment facilities online at <http://www.champlainhealthline.ca>. If you live in the United States and need help in finding a treatment center, the Federal Substance Abuse & Mental Health Services Administration (SAMHSA) offers a free service to help you locate a facility near you. The toll free Treatment Referral Hotline can be reached 24 hours a day, 7 days a week; 1-800-622-HELP (4357). You can also access their treatment facility location online at <http://www.samhsa.gov/treatment/index.aspx>. Additional resources for counseling, treatment and rehabilitation include:

Al-Anon: 1-800-356-9996

American Council on Alcoholism Helpline: 1-800-527-5344 Cocaine Hotline: 1-800-COCAINE

National Council on Alcoholism: 1-800-NCA-CALL

SMOKE-FREE AND TOBACCO-FREE POLICY

All Dorsey Schools are "smoke-free". Dorsey Schools is dedicated to maintaining a smoke-free and tobacco-free work and educational environment. All Dorsey Schools employees, students, visitors, guests and contractors are required to comply with this policy, which shall remain in effect at all times.

In compliance with various regulations, to protect the health and safety of Dorsey Schools' faculty, staff, students and visitors, and to create a healthier and cleaner school environment, this policy defines smoking and tobacco use to include the following:

1. "Smoking" is defined as the use of smoke-producing tobacco products, such as cigarettes, cigars, cigarillos, mini-cigars, and hookah.
2. Tobacco use is defined as the use of any tobacco product including cigarettes, cigars, cigarillos, mini-cigars, hookah, spit tobacco, snuff, and other smokeless products. "Smokeless products" include the use of e-cigarette, or "vaping", electronic smoking devices or electronic nicotine delivery systems. FDA-approved cessation aids, such as nicotine patches and gum, are not included in this category.

Smoking and tobacco use, as defined above, is prohibited in all enclosed areas at Dorsey Schools without exception. This includes common work areas, classrooms, conference and meeting rooms, private offices, hallways, employee lounges, student lounges, lunch areas, stairs, restrooms, and employer owned or leased vehicles and all other enclosed facilities. Additionally, smoking and tobacco

use shall be prohibited within fifteen feet (twenty-five feet in Connecticut) surrounding all entrances, ventilation systems and windows that may be opened or used for ventilation, so that persons are not negatively impacted by secondhand smoke. Dorsey Schools only permits smoking and tobacco use only in designated outdoor areas. In addition, tobacco users must dispose of smoking and tobacco-related waste in the appropriate receptacles. The cigarette receptacle must be used only for its intended purpose in order to reduce the possibility of other debris causing a fire. Students may only utilize outdoor areas during designated break times and are not permitted to leave class, laboratory or clinic to use tobacco products. Employees who choose to use tobacco products are required to utilize their breaks and lunch period; additional smoke breaks will be considered excessive. Should Dorsey Schools' management determine abuse of this policy, management will address it on an individual basis and take appropriate disciplinary action if necessary.

DESCRIPTION OF HEALTH RISKS ASSOCIATED WITH NICOTINE USE

The US Centers for Disease Control and Prevention describes smoking as the leading preventable cause of death with nearly one in five medical deaths being contributed to by tobacco use. Smoking harms nearly every organ of the body and is the leading cause of cancer. Smokers are more likely than non-smokers to develop heart disease, stroke, and lung cancer. Smokeless tobacco is associated with many health problems. These include nicotine addiction, cancer of the mouth, throat and stomach, stroke and risk to pregnancy. Further information is available from the Centers for Disease Control and Prevention, National Center for Chronic Disease Prevention and Health Promotion, Office on Smoking and Health. E-mail: tobaccoinfo@cdc.gov or phone: 1-800-CDC-INFO.

ASSISTANCE TO QUIT SMOKING

There are many resources available to assist individuals who wish to quit smoking. For those who wish to quit smoking at our Michigan and Connecticut office and campus locations, we encourage them to contact the US Department of Health and Human Services and National Institutes of Health One website at www.smokefree.gov for information. For our Ottawa office and campus location, we encourage those who wish to quit smoking to contact the Ontario Ministry of Health and Long-term at <http://www.mhp.gov.on.ca/en/smoke-free/quit-smoking.asp>.

REVIEW AND DISTRIBUTION

This Drug and Alcohol Abuse Prevention Policy, including Smoke-Free and Tobacco-Free Policy will be reviewed biennially (in even- numbered years) to determine its effectiveness. During the review and analysis of the effectiveness of the methodology will be reviewed in addition to the sanctions imposed therein.

The Drug and Alcohol Abuse Prevention Policy, including Smoke-Free and Tobacco-Free Policy, will be included in Dorsey Schools annual Campus Safety Report that is distributed to employees and students on an annual basis by October 1st, and also provided to new enrolled students during their orientation, and to newly hired employees during the onboarding process acknowledges receipt of this policy.

CAMPUS CONTACT INFORMATION

For further information or assistance contact the Campus Safety Officer (Managing Director or designated campus official) listed below:

Dorsey Schools – Training Direct Danbury, CT
Main phone number – (203) 456-8611
Managing Director/ Campus Safety Officer – Marilyn Calderon
Office Manager/ Designated Campus Safety Officer – Jennifer Osorio

Local Police Information
Danbury Police Department - (203) 797-4614
Emergency 911

2020 CAMPUS SAFETY AND SECURITY SURVEY – DORSEY TRAINING DIRECT DANBURY, CT CAMPUS

The Campus Safety and Security Survey contains the criminal offenses, arrests, disciplinary actions, violence against women, etc. as reported to the campus or local law enforcement as occurring on campus or on public property within close proximity of the campus. The survey includes a category specific to hate crimes. Incidents recorded below are for the last three completed calendar years.

<u>CRIMINAL OFFENSES</u>	<u>ON CAMPUS</u>			<u>PUBLIC PROPERTY</u>		
	2019	2018	2017	2019	2018	2017
Murder and Non-negligent manslaughter	0	0	0	0	0	0
Negligent manslaughter	0	0	0	0	0	0
Rape	0	0	0	0	0	0
Fondling	0	0	0	0	0	0
Incest	0	0	0	0	0	0
Statutory rape	0	0	0	0	0	0
Robbery	0	0	0	0	0	0
Aggravated assault	0	0	0	0	0	0
Burglary	0	0	0	0	0	0
Motor vehicle theft	0	0	0	0	0	0
Arson	0	0	0	0	0	0

<u>HATE CRIMES</u>	<u>ON CAMPUS</u>			<u>PUBLIC PROPERTY</u>		
	2019	2018	2017	2019	2018	2017
Murder and Non-negligent manslaughter	0	0	0	0	0	0
Rape	0	0	0	0	0	0
Fondling	0	0	0	0	0	0
Incest	0	0	0	0	0	0
Statutory rape	0	0	0	0	0	0
Robbery	0	0	0	0	0	0
Aggravated assault	0	0	0	0	0	0
Burglary	0	0	0	0	0	0
Motor vehicle theft	0	0	0	0	0	0
Arson	0	0	0	0	0	0
Simple assault	0	0	0	0	0	0
Larceny-theft	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0
Destruction/damage/vandalism of property	0	0	0	0	0	0

<u>VAWA OFFENSES</u>	<u>ON CAMPUS</u>			<u>PUBLIC PROPERTY</u>		
	2019	2018	2017	2019	2018	2017
Domestic violence	0	0	0	0	0	0
Dating violence	0	0	0	0	0	0
Stalking	0	0	0	0	0	0

<u>ARRESTS</u>	<u>ON CAMPUS</u>			<u>PUBLIC PROPERTY</u>		
	2019	2018	2017	2019	2018	2017
Weapons: carrying, possessing, etc.	0	0	0	0	0	0
Drug abuse violations	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0

<u>DISCIPLINARY ACTIONS</u>	<u>ON CAMPUS</u>			<u>PUBLIC PROPERTY</u>		
	2019	2018	2017	2019	2018	2017
Weapons: carrying, possessing, etc.	0	0	0	0	0	0
Drug abuse violations	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0

<u>UNFOUNDED CRIMES</u>	2019	2018	2017
Total unfounded crimes	0	0	0