

# VATTEROTT COLLEGE – L'ECOLE CULINAIRE - MEMPHIS

## 2010 ANNUAL SECURITY REPORT

Campus security and safety are important issues in postsecondary education today. In recognition of this fact, and in keeping with applicable federal requirements, L'Ecole Culinaire - Memphis (the "College"), located at 1245 North Germantown Parkway; Cordova, Tennessee, publishes each year this Safety and Security Report (the "Report"). This Report discloses information concerning the College's safety and security policies and procedures, as well as statistics regarding certain types of crimes reported to the College and local law enforcement during the prior year. It is the College's intention that this Report will inform its students, prospective students, employees and prospective employees of the College's safety and security policies. Further, this Report is intended to provide such parties with key information regarding the security of the College and surrounding areas, and ultimately, to create a safer more secure campus environment.

This Report is made available to the public on the College's website and electronically distributed to all enrolled students and current employees each year, in each case in accordance with applicable federal laws.

### **I. GENERAL POLICIES RELATING TO CAMPUS SAFETY AND SECURITY**

#### **Security Awareness**

The College recognizes, and encourages others to be aware, that no environment is entirely free of risk. Each person must assume responsibility for his or her own safety both on-campus and off. This having been said, the College strives to offer its students and employees a secure and safe environment in which to teach and learn, including through compliance with applicable federal, state and local building codes and board of health and fire marshal regulations.

#### **Security of and Access to Campus Facilities**

Access to campus facilities is controlled at all times. Enrolled students are required to enter and exit campus facilities through designated doors. The main entrance is only for the use of College personnel, visitors and students. All visitors are required to enter through the main entrance and sign a Visitor's Log. Neither visitors nor guests are allowed to access or visit any area of the building without the permission of a College employee. No visitor or guest may attend any class without knowledge and permission of a facility supervisor. The campus is protected with intrusion alarms during non-operating hours. Designated staff only may activate the alarm upon entering or exiting the building. The College does not operate or sponsor any on-off-campus student housing or student organizations, including fraternities and sororities.

#### **Campus Law Enforcement**

The College's Safety and Security Officers have the authority to ask persons for identification and to determine whether individuals have lawful business at the College. Safety and Security officers do not possess the power to arrest. Criminal incidents are referred to the local police who have jurisdiction over the campus. The Safety and Security Office at the College maintains a highly professional working relationship with the Cordova, Tennessee Police Department. All crime victims and witnesses are strongly encouraged to immediately Report any crime to the College's Safety and Security Office and the appropriate police agency, in accordance with the reporting procedures set out below. Prompt reporting will assure timely warning notifications on-campus and timely disclosure of crime statistics.

**Possession, Use and Sale of Alcoholic Beverages or Illegal Drugs; Enforcement of State Underage Drinking Laws and State Drug Laws**

As a matter of policy, Vatterott College prohibits the unlawful manufacture, possession, use, sale, dispensation, or distribution of controlled substances and the possession or use of alcohol by students and employees on its property or at any College activity. Any violation of these policies will result in appropriate disciplinary action up to and including expulsion in the case of students and termination in the case of employees, even for a first offense. Violations of the law also will be referred to the appropriate law enforcement authorities. It is unlawful to sell, furnish or provide alcohol to a person under the age of 21. The possession of alcohol by anyone less than 21 years of age in a public place or a place open to the public is illegal.

Students or employees also may be referred to abuse help centers. If such a referral is made, continued enrollment or employment will be subject to successful completion of any prescribed counseling or treatment program. Information regarding the College's drug-free awareness program and drug and alcohol abuse prevention program may be obtained from the College's Financial Aid Office.

**Sex Offenses and Offenders**

All students and employees have the right to learn and work in an environment free from sexual harassment. Vatterott College prohibits sexual harassment by employees and students, and will not tolerate any such conduct in any form.

The College has developed and implemented procedures to follow when a sex offense occurs. If any individual is a victim of a sexual assault occurring at the College, his or her first priority should be to locate a place of safety. He or she next should obtain any necessary medical treatment. The College strongly advocates that subsequent to securing safety and medical care, any victim of sexual assault should report the incident immediately to the College's Director of Education or Campus Director. Employees also may contact their Department Manager, Campus Director or Corporate Director of Human Resources. Time is a critical factor for evidence collection and preservation. In addition to providing information regarding assistance resources and options for action available to the victim, the College will inform victims of sex offenses of their right to report the matter directly to local law enforcement agencies, and the College (if requested) will assist the victim in notifying such agencies.

The College will promptly investigate all reported sex offenses in as confidential a manner as the College deems reasonably possible. Upon completing such an investigation, a College official will notify the accused and the accuser that the College will conduct a disciplinary hearing to determine appropriate action. Before a disciplinary hearing is held, the accused and the accuser are informed of their rights to have others present at the proceeding. The accused and the accuser shall be informed of the College's final determination and any sanction that may be imposed against the accused following the completion of a disciplinary hearing concerning the sex offense. Sanctions that may be imposed against a student or employee that the College determines to have violated the College's sex offense policy may include, without limitation, suspension or expulsion from the College or termination of employment. In addition, the College may change a victim's academic situation after a reported sex offense, if the change is requested by the victim and is reasonably available.

Though on-campus counseling and mental health services are not available to victims of sex offenses, College officials are able to provide information regarding off-campus counseling, mental health facilities and other services. The United States Department of Justice Violence Against Women Office website at

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<http://www.ovw.usdoj.gov/> also provides useful information relating to victim’s rights and available assistance.

The College conducts an annual sexual assault program intended to aid in the prevention of sex offenses. This program entails the distribution and review of the College’s current Campus Catalog (which contains policies and information on the prohibition of sexual harassment), and the promotion of rape awareness, including acquaintance rape and other forcible and non-forcible sex offenses. The College does not have any other formal crime prevention educational programs.

Finally, in accordance to the "Campus Sex Crimes Prevention Act" of 2000, which amended the Jacob Wetterling Crimes Against Children and Sexually Violent Offender Registration Act, the Jeanne Clery Act, and the Family Educational Rights and Privacy Act of 1974, the College is providing the following link to the Federal Bureau of Investigation’s *National Sex Offender Public Website*, which provides law enforcement information provided by each State concerning registered sex offenders:

<http://www.fbi.gov/hq/cid/cac/registry.htm>

Note, the information provided through the link above should be used only for the purposes of the administration of criminal justice, screening of current or prospective employees, volunteers or otherwise for the protection of the public in general and children in particular. Unlawful use of Registry information for purposes of intimidating or harassing another is prohibited and any willful violation shall be punishable as a Class 1 misdemeanor.

**II. REPORTING CRIMES OR EMERGENCIES OCCURRING ON CAMPUS**

All Community members, students, faculty, staff, and visitors are strongly encouraged to report immediately any crime, emergency or other public safety concern to the College’s Safety and Security Office and the appropriate local law enforcement agency. Any such crimes or concerns may be reported to the following personnel at the College:

Campus Security – Allied Barton	See Receptionist
Campus Director – Richard Zurburg	(901) 754-7115
Campus Director of Education – Bonnie Delashmit	(314) 754-7115

The College does not have procedures for voluntary, confidential reporting of crime. All reports will be investigated and all violations of the law will be referred to law enforcement agencies.

**III. EMERGENCY ACTION PLAN**

The College’s Emergency Action Plan (the “Plan”) establishes and delineates the procedures that the College will use to communicate with faculty, staff, students and the general public during an emergency, as well as the evacuation procedures members of the campus community should follow in the event of an emergency. The Plan sets out general emergency and evacuation procedures, as well as procedures for specific emergency events (*e.g.*, fire, earthquake, bomb threat). The Plan is published in an easy-to-use, flip-chart form that is available in public spaces throughout the College. All faculty, staff and students are encouraged to review the Plan periodically. Following we set out the general Emergency policies and procedures included in the Plan.

**General Emergency Policies and Procedures**

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Should an event occur, either on or off campus, which, in the judgment of the Campus Director, constitutes a significant emergency or dangerous situation involving an immediate threat to the health or safety of the campus community (an "Emergency"), a campus-wide notification would be issued by activating the College's electronic Emergency Notification System ("ENS"). The ENS transmits text message notifications to employees, students, and designated persons in the larger community in the event of an Emergency. In the event of an Emergency, the Campus Director would craft a notification containing a basic description of the time and form of the Emergency, and issue such notification via the ENS. In addition to activating the ENS, the Campus Director may, if warranted, make an Emergency announcement over the College intercom system.

Prior to activating the ENS or making an Emergency announcement, the Campus Director will determine (1) whether, in his or her judgment, the information suggesting that an Emergency has occurred is credible, and (2) whether issuing a notification or making an announcement would compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the Emergency. If the Campus Director is unable to carry out the duties described above, they will be carried out by the Director of Education.

In the event that an Emergency announcement is made directing an evacuation, all persons on campus should exit the building immediately by way of the nearest stairwell, marked with a lighted red exit sign, and follow the signs, exiting to the outside and quickly proceeding to the parking lot in front of the building. If the nearest stairwell is blocked by smoke, individuals should use another stairwell. Please see posted evacuation routes for each office or classroom space. In the event of an Emergency, persons should *not* use any elevator while evacuating. It is the responsibility of all able staff to assist any persons with disabilities in descending the stairwell quickly and safely.

Those persons who exit the building first must position themselves far enough away from the street to enable everyone to stand clear of emergency vehicles. The street must be kept clear at all times, so as not to hamper the movement of emergency vehicles into the area.

Once outside the building, the Campus Director or Director of Education will confirm that appropriate emergency personnel have been contacted, congregate all employees in the parking lot in front of the building and confirm that all employees and visitors are out of the building, and meet with emergency personnel at the front entrance to provide additional information. Staff members trained in CPR and rescue breathing should survey the individuals outside to determine if anyone is in need of first aid and provide such aid as needed.

Once outside, individuals should not re-enter the campus building for any reason until it is declared safe by the appropriate emergency personnel and the Campus Director has agreed to permit persons to re-enter.

Should an Emergency occur, either on or off-campus, which, in the judgment of the Campus Director, constitutes an ongoing or continuing concern, follow-up information would be issued to the campus community as needed. This information would be issued through the College's e-mail system to students, faculty, and staff. Related information also would be posted in classrooms, campus library, student bulletin boards, and student lounges as appropriate.

A test of the College's Plan is publicized and conducted at least once annually. Documentation of any such test is maintained at the College, and includes a description of the exercise, the date and time at which it occurred, and whether it was announced or unannounced.

**IV. TIMELY WARNING OF CERTAIN CRIMES**

In accordance with federal requirements, should certain crimes occur, either on or off-campus, which, in the judgment of the Campus Director, constitute an ongoing or continuing threat, a campus wide “timely warning” would be issued to the campus community. This timely warning would be issued through the College e-mail system to students, faculty, and staff. Related information also would be posted in classrooms, campus library, student bulletin boards, and student lounges as appropriate.

**V. CRIME STATISTICS**

The College prepares the crime statistics for this Report in accordance with federal law and in cooperation with the College’s Safety and Security Office and local law enforcement agencies. This campus is new and is not required to submit crime statistics this year, in accordance with federal law.