

ON CAMPUS SAFETY AND SECURITY POLICIES

Security of Facilities

Campus Access Policy

During business hours, our buildings will generally be open to students, parents, employees, contractors, guests, and invitees. During non-business hours, access to all areas is by key, if issued, only.

Our Campus Security Authorities have the authority to ask persons for identification and to determine whether individuals have lawful business on campus. The security authorities will refer criminal incidents to local police who have jurisdiction on campus. All crime victims and witnesses are strongly encouraged to immediately report any crime to a Campus Security Authority. We would rely on local and state law enforcement personnel in matters requiring such action.

Personal Safety

While on campus: Ohio Business College attempts to provide a safe and secure environment, students, faculty, staff, and campus visitors are ultimately responsible for their safety. Safety is enhanced when students and employees take precautions such as:

- Report all suspicious activities to a Campus Security Authority
- Never take personal safety for granted
- Avoid walking to your car at night alone
- Carry only small amounts of cash
- Never leave valuables (wallets, purses, books, computers, etc) unattended
- Carry your keys with you at all times and don't lend them to anyone
- Lock your car doors and close the windows when leaving your car
- Never leave valuables in your car especially if they are easily noticeable
- Never admit anyone without a valid ID on campus premises

While online: Ohio Business College and the student have a shared responsibility to ensure that the student's privacy and the integrity of the program are protected. In order to secure the private information of the student and Ohio Business College, the College creates a unique username and password for each student, faculty, and administrator for the computer logon, student email system and Learning Management System (LMS). It is the student's responsibility to strictly preserve the privacy of their login and password information. Students are prohibited from sharing login and password information.

Reporting Crimes or Emergencies when an Incident Occurs

Students, employees, and any visitors or others present on any campus are encouraged to report any crime they experience or witness to a school employee. Here are the steps an employee should follow when notified of a crime:

1. If the employee is NOT a Campus Security Authority (School Director, Department Head, Registrar, Financial Aid, Faculty) the crime victim is referred to a Campus Security Authority immediately.
2. If the employee is a Campus Security Authority, an Incident Report is completed and local law enforcement is notified as the situation warrants.
3. When completing an Incident Report, complete all sections.
4. Return the completed Incident Report and any other documents pertaining to the incident to the Registrar.

Campus Security Authority

Campus Security Authority

Campus Law Enforcement – Because of the size of the campuses, Ohio Business College is not required to have a separate law enforcement department. Each campus has designated a Campus Security Authority (CSA). CSA responsibilities who become aware of a reportable crime must document the incident fully and notify the Campus Director immediately. The CSA acts as the “go to person” in the event of an emergency. The CSA will be cognizant of the appropriate procedures to follow depending on the emergency. Faculty, staff, and students are informed on a quarterly basis who the “go to person” is in the event of an emergency. Refer to each campus who is the Campus Security Authority while you are in attendance.

The following information must be reported for all Clery reportable crimes (refer to Incident/Accident Report form):

- The details of the incident(s) – sufficient to properly classify the type of crime
- The location of the incident
- The date and time of the incident
- The date and time the CSA was advised of the crime. In the event an incident involves an ongoing imminent threat to the College, the CSAs are encouraged to call 911.

Timely Warnings

Timely Warning Policy

At Ohio Business College a significant emergency is described as one in which the student body and staff/faculty are at risk of being injured or killed. This will be confirmed by the School Director or a management team member designated if the director is not available. Examples of a significant emergency include but are not limited to gunshots, fire, bomb scares, physical violence at the location or any other violent act that threatens the student body, faculty or staff at the campus.

Once it is confirmed that there is a significant emergency the students and staff will be notified via email and/or text message. The email or text message will state “There is a significant emergency on campus. Do not attend class until further notice. This notification will also be sent to the local television stations and emailed to the students’ school email address or texted. The notification will be initiated by the School Director.

Emergency Notification/Response and Evacuation Policies and Procedures

Emergency Notification/Response

An Emergency Notification is triggered by an event that is currently occurring on or imminently threatening campus and should be initiated for any significant emergency or dangerous situation involving an immediate threat to the health and safety of students and employees. Notifications are to be issued without delay upon confirmation of an emergency. Each campus has their specific plan in place to immediately notify the campus community upon confirmation of a significant emergency or dangerous situation. Evacuation procedures are posted in each room.

Refer to each campus' Safety Procedures for additional campus procedures.

NOTE*Those identified as REACT Team members may change each quarter.

Sheffield Campus

REACT - Responsible Emergency Action Team

The REACT team is responsible for initiating an emergency action plan such as fire, tornado, or significant emergency. Each list will start at the top and continue downward until a team member can be contacted by campus personnel. In the event of an immediate threat the appropriate action should be initiated promptly with the REACT team contacted once everyone is safe.

Day Time REACT Team

- Donna Stevens, Campus Director
- Rhonda Higgins, Registrar
- Wendy Little, Student Accounts

Lorain Extension

Day Time REACT Team

- Greg Schultz
- Terry Klein
- Larry Pater
- Kevin Klein

Night Time REACT Team

- Greg Schultz
- Terry Klein
- Larry Pater
- Kevin Klein

Elyria Extension

Day Time REACT Team

- Greg Schultz
- Dee Bowersock
- Jeff Eacott

Night Time REACT Team

- Greg Schultz
- Jeff Eacott
- Tim Prater

Dayton Campus REACT Team

- Campus Director Scott Skaroupka
- Assistance Campus Director Lisa Perdomo
- Training Manager Dennis Volz
- Classroom Instructors

Columbus Campus REACT Team

- Campus Director Steve Tinney
- Financial Aid, Nicholas Stella
- Registrar, Kristin Ivory
- Classroom Instructors,
 - Ray Fietek
 - Daniel Stanley
 - Anthony Worley
 - Ja'Quan Stephens
 - Paul White

Evacuation Procedures

Each school has posted in every room the evacuation route. Refer to that route for each room you are in. Schools are required to conduct an annual test of the emergency response and evacuation procedures. When the school is going to conduct this test, they will notify the students.

STUDENT CODE OF CONDUCT AND DISMISSAL FROM SCHOOL

Failure to comply with policy and procedure statements as outlined in the college catalog and other college publications may result in a student's dismissal from school. Each student who attends Ohio Business College is an adult and is expected to behave accordingly. Recommendations for employment through Career Services and Faculty are based on scholastic records, attendance, and conduct.

Ohio Business College reserves the right to permanently dismiss any student for any of the following reasons or any other reason as determined by the Campus Director to protect the interest of all students, faculty, staff, and property:

- ◆ Academic dishonesty including, but not limited to, plagiarism and academic cheating.
- ◆ All acts of hazing, bullying, and cyberbullying are prohibited.
- ◆ Forgery, alteration, or misuse of college documents, records, or identification.
- ◆ Knowingly furnishing false information to Ohio Business College.

- ◆ Obstruction or disruption of college-authorized activities on college property.
 - ◆ Physical or violent verbal abuse of any person on college property, or at functions sponsored or supervised by Ohio Business College.
 - ◆ Any act involving sexual harassment, violence, coercion, and intimidation will not be tolerated. This specifically includes offense of domestic violence, dating violence, sexual assault, and physical and cyber stalking.
 - ◆ Conduct that threatens or endangers the health or safety of any person, including oneself, on college property or at functions sponsored or supervised by Ohio Business College.
 - ◆ Theft or intentional damage to private property on premises owned or controlled by Ohio Business College.
 - ◆ Unauthorized entry to college facilities or property.
 - ◆ Unauthorized use or misuse of college property including, but not limited to, attempting to leave the library with library materials which have not been properly borrowed, unauthorized use of computer equipment, or misuse of college telephones.
 - ◆ Speech that is intended to insult or stigmatize an individual or a small number of individuals on any basis including but not limited to their sex, race, color, handicap, religion, sexual orientation, or national or ethnic origin.
 - ◆ Smoking in college buildings.
 - ◆ Violation of college regulations or campus policies.
 - ◆ Use, possession, sale, or distribution of marijuana, alcohol, narcotics, or dangerous drugs, except as expressly permitted by law, on college property at any time. Drug testing, at the college's expense, will be required whenever a college personnel suspects or has reason to believe that a student might be engaging in the unlawful and/or inappropriate use of a controlled or illegal substance, or the inappropriate use or abuse of a prescription medication
 - ◆ Drunken or disorderly behavior on college property or at functions sponsored or supervised by Ohio Business College.
 - ◆ Intimidating behavior, including the use of social media, directed toward any student, faculty member, staff member, or administrator.
 - ◆ Unauthorized possession or use of firearms, other dangerous weapons, explosives, or fireworks on college property or at functions sponsored or supervised by Ohio Business College.
 - ◆ The illegal use or possession of, or tampering with, safety equipment on college property.
 - ◆ Giving false testimony or evidence at any official college hearing.
 - ◆ Conduct deemed unlawful by the criminal statutes of the State of Ohio or the United States of America and conduct that endangers or threatens the security of Ohio Business College or the community.
 - ◆ Nonpayment of school charges.
 - ◆ Cell phones: Students may not receive or place cell phone calls, text messages, or pages during class time, or in classrooms. Students may only use cell phones in the break room or outside the building.
- *Refer to the Practical Nursing Student Handbook for additional Student Code of Conduct pertaining to the Practical Nursing student in the classroom/lab and at clinical sites.

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Reporting Crimes or Emergencies when an Incident Occurs

On Campus or at a school sponsored event off campus

Ohio Business College encourages the reporting of sexual misconduct that is prompt and accurate. This allows the college to quickly respond to allegations and offer immediate support to the victim. Ohio Business College is committed to protecting the confidentiality of victims, and will work closely with students who wish to obtain confidential assistance regarding an incident of sexual misconduct.

If a student or employee is aware that a crime has been, or is being, committed on school property or at a school sponsored event, the crime should be reported as soon as possible to a Campus Security Authority. There are specific Campus Security Authorities designated at each campus. The CSA's will determine (along with the victim) whether the incident must be reported to the local law enforcement authorities. The CSA's offer confidentiality to victims and are expected to keep reports private to the extent permitted under the law and college policy. This means that they may have to report to college officials but will not broadcast the information beyond what is required by law and policy. The CSA will complete an incident report and with the assistance of the victim will determine whether the local law enforcement agency should be notified. The corporate office will be informed of the incident and immediately work with the campus director and campus security authority to investigate.

If the student or employee does not want to pursue action through the school or the criminal justice system, they should be encouraged to make a confidential report. The purpose of a confidential report is to comply with the student or employee wishes to keep the matter confidential, while taking steps to ensure the future safety of themselves and others. The College will offer guidance for the victim to outside agencies who are experts in the field and able to help the victims.

Not on Campus

If a student experiences a crime outside of the campus and makes campus personnel aware of it, the CSA will offer assistance in guiding the student to report the incident to the proper authorities.

Disciplinary Proceedings

If you are a victim of a sexual assault at this institution, your first priority should be to get to a place of safety. You should then obtain necessary medical treatment. We encourage you to report any sexual assault in a timely manner. Time is a critical factor for evidence collection and preservation in these cases. The assault should be reported directly to a Campus Security Authority or other institutional official. Sexual assaults will be reported to the local law enforcement officials as required, requested, and necessary.

Should a victim report a VAWA crime that occurred on the campus or at any related campus activities, the school will take the necessary steps to investigate the situation. The steps followed will be:

1. Because the campus does not have its own law enforcement department, these incidents are referred to the local law enforcement agency.
2. In the meantime, the CSA should maintain a supportive and listening posture at all times.
3. The CSA must determine whether the victim is safe and the whereabouts of the perpetrator.
4. The CSA determines what type of help the victim would like to have and if medical assistance is needed. The CSA suggests to the victim to visit the hospital for a checkup before bathing, washing, or cleaning any body parts of before changing clothes or disposing of any other evidence that may be valuable in apprehending the suspect. It is important to preserve and collect physical evidence.

5. The CSA, with agreement of the victim, notifies the local law enforcement agency.
6. The CSA files an incident report with the victim's assistance.
7. The CSA offers unconditional support to the victim by staying with them or by accompanying the victim to the hospital.
8. The Incident Report is forwarded to the corporate office. The corporate office works with the campus' CSA and Campus Director in determining how the incident should be handled. If the perpetrator is a current student, the corporate office must investigate and determine the consequences of the incident on their continued enrollment.
9. Incidents will be investigated by interviewing the involved parties and documents containing facts pertinent to the incident.
10. Within 15 working days after the incident, a meeting will take place with both the alleged victim and alleged perpetrator. Fair and impartial disciplinary proceedings in which Both will be:
 1. The accuser and accused will be informed of the hearing date and time
 2. The accuser and accused will be entitled the same opportunity to have others present during the disciplinary proceedings
 3. The accuser and accused will be entitled to hear the information given from the opposite party and sanctions imposed.
 4. The accuser and accused will be informed of the outcome of any institutional disciplinary proceedings that brought alleging a sex offense.
 5. Possible sanctions may result in a student's suspension, expulsion from school.
 6. A student found guilty of violating the institution's sexual offense policy could be criminally prosecuted in the state courts and may be suspended from the college.

Identity Theft

Ohio Business College takes every possible means in safety-guarding students' personal information. Additionally, college students spend a great amount of time online whether doing homework, watching videos, or shopping. Students must be aware of identify theft. Scammers may only need a few key personal details to access bank accounts, credit cards, credit history and more. Scammers often see college students as easy targets for identity theft. Here are some tips

- Don't overshare. NEVER give any information to any person by phone or computer that you don't know, or whose credentials you have not verified.
- Don't open emails from persons you don't know, or companies that you have not established business relationships with.
- Regularly scan your computer for ad-ware and spy-ware programs.
- Change your passwords frequently.
- Monitor your accounts.
- Update your anti-virus software frequently and disconnect from the internet whenever you are not actively engaged on the web.
- Shred financial documents.
- Never leave your laptop unattended.
- Guard your personal information at all times. This includes:
 - Social security numbers
 - Bank account information
 - Credit card numbers
 - Insurance cards
 - Driver's license or passport information

- School or work IDs
- Military IDs
- Other valuable identifying information

If you think someone may have stolen your identity:

1. Report it to local police – many credit card companies, for example, will need a copy of the police report.
2. Contact the fraud departments of each of the three major credit bureaus:
 - Equifax: www.equifax.com
 - Experian: www.experian.com
 - TransUnion: www.transunion.com
3. Call U.S. Department of Education Office of Inspector General 1-800-MIS-USED (1-800-647-8733) Call toll-free 1-877-ID-THEFT (1-877-438-4338) or file a report online at IdentityTheft.gov
4. Report it to the Federal Trade Commission: <http://ftc.gov>
5. Don't Ignore It, Report It
6. Report crimes or suspicious activity or behavior to the campus CSA immediately.

Additionally, review your financial statements, regularly check your accounts for unauthorized transactions. Monitor your credit report. Request a free credit report from annualcreditreport.com. Consider a credit alert or freeze. Notify your parents or guardians to help assist in taking further steps.

For Students receiving Title IV (Financial Aid Assistance)

Identity theft is the unlawful use of another person's identity without permission or using someone's identifiers to create a fake person. You can disable your StudentAid.gov account if you suspect identity theft.

Examples of identity theft:

- Another individual or entity has used your name and Social Security Number (SSN) without your permission.
- Another individual or entity has used one or more pieces of identifying information that are unique to you. This could be your SSN, driver's license number, or date of birth.

Victims of identity theft frequently are also the victims of forgery. Learn more about qualifying and applying for loan discharge due to forgery, below.

You might be eligible for a discharge of federal student loans based on forgery if your signature was forged or your personal information was used without your permission resulting in a loan fraudulently made in your name, you might be eligible for a discharge of loans made under the William D. Ford Federal Direct Loan (Direct Loan) Program. Federal Family Education Loan (FFEL) Program and Perkins Loan Program loans may also be eligible if they are held by the U.S. Department of Education.

Eligibility for Forgery Discharge

You might be eligible for a discharge of any U.S. Department of Education-held loans if an individual or organization (other than a school employee*) forged your signature on a loan document or a loan was made in your name as a result of forgery.

How To Apply for Forgery Discharge

If there is a Direct Loan, FFEL Program, or Perkins Program loan in your name and for which you did not apply, complete the Loan Discharge Application: Forgery.

*If you believe that an employee of the school that determined your eligibility for the loan signed your name on the promissory note or other loan documents without your authorization, complete the Loan Discharge Application: False Certification (Unauthorized Signature/Payment) form.

Loan Amount Discharged if Approved

If you meet the eligibility requirements for a discharge, the entire remaining balance of the loan will be discharged, and any payments made on the loan will be refunded.

If Discharge Request Is Denied

You will remain responsible for repaying the loan. If you believe that your loan discharge application was denied in error or if you have additional information that you believe would support your eligibility for a forgery discharge, you may ask the U.S. Department of Education to review the denial.

<https://studentaid.gov/manage-loans/forgiveness-cancellation/forgery>

Alcohol & Drug Policy

The following is the alcohol and drug policy as it appears in the **employee** handbook:

Loss of time, money, and business resources in connection with the use of alcohol and illegal drugs is a major concern in American society. This policy is in accordance with the “Drug-Free Workplace Act” which requires any organization receiving federal contracts, grants or awards of more than \$25,000 to meet certain anti-drug standards. These anti-drug standards include publishing and enforcing a policy which prohibits the illegal use, sale or possession of controlled substances in the workplace, notifying the government when employees are convicted of illegal drug activities on the job, and taking personnel action against convicted employees. The law does not require drug screening. Additionally, the “Drug-Free Schools and Communities Act” requires schools, colleges, and universities to meet similar standards to prevent on-campus alcohol and drug abuse.

The use of controlled substances and alcohol as well as the unlawful manufacture, distribution, dispensation, or possession of such substances is prohibited on college premises. Any employee or student found to have violated this prohibition will be subject to disciplinary action, up to and including immediate discharge or expulsion, in addition to criminal penalties that may be imposed by appropriate authorities.

The 1988 Drug-Free Workplace Act requires that any employee convicted of any criminal drug statute for a violation occurring in the workplace shall notify their employer not later than five days after such conviction. Notification should be given to the Human Resource & Payroll Administrator. Any employee subject to this requirement who fails to notify the appropriate offices shall be subject to appropriate discipline, up to and including immediate discharge. Any student who has questions or concerns regarding his or her obligations under this Drug-Free Campus Policy should contact the School Director. Employees who have questions concerning obligations under the Drug-Free Workplace Act should contact the Human Resource & Payroll Administrator. Compliance with this policy in all respects shall be a condition of continued employment with the school for an employee and a condition of continued enrollment for a student.

Students and/or employees who are chemically dependent are urged to seek help for an alcohol or drug problem before it interferes with their jobs, their performances or their grades.

The following is the alcohol and drug policy that is distributed to **students** annually:

Purpose

Ohio Business College is committed to protecting the safety, health, and well-being of its employees and students and recognizing that abuse of alcohol and other drugs compromises this dedication. The Drug Policy of Ohio Business College is based on the goal of assisting staff and students to benefit from an alcohol/drug free lifestyle. Although Ohio Business College does not employ counselors, each campus does provide employees and students with guidance in obtaining assistance with problems resulting from the use and abuse of substances.

Campus Responsibilities

- Annually, each campus provides all staff and students with Ohio Business College's Drug Policy.
- Each campus has available to all staff and students, brochures and pamphlets on the effects of drug and alcohol abuse.
- Each campus has available the Crimes and Penalties on Federal, State, and Local Drug & Alcohol Violations.
- Each campus has available local agencies in which to direct staff and students for assistance.

Procedures

- Should a student approach a staff or faculty member on problems they are having with drugs or alcohol, the student should be immediately referred to the Registrar. The Registrar will provide the student with the list of local agencies and their phone numbers. The Registrar should offer the student the use of their telephone to call the agency for assistance.
- Should a staff or faculty member approach another staff or faculty member on problems they are having with drugs or alcohol, the staff member should be immediately referred to the School Director. The School Director will provide the staff or faculty member with the list of local agencies and their phone numbers.

***NOTE: Drug testing, at the college's expense, will be required whenever a college personnel suspects or has reason to believe that a student might be engaging in the unlawful and/or inappropriate use of a controlled or illegal substance, or the inappropriate use or abuse of a prescription medication.

Security of Student Data

Middletown Corporate Office

At the Middletown location, the computers are serviced by Radtech. RadTech provides comprehensive, integrated technology solutions to small and mid-sized businesses in the greater Miami Valley region.

The computer security procedures for this location are:

- Windows updates are applied through group policy on all computers/servers on the network (@ Middletown). Symantec Endpoint Security is the antivirus software used at Middletown. Symantec Endpoint Security is installed on all workstations / servers individually and set to automatically update and quarantine any threat found.
- Inbound security is controlled by a cisco access list. The cisco access list is updated based on the needs of Ohio Business College and only allowing necessary ports open. In addition to the cisco access list, inbound/outbound email security is filtered through McAfee. McAfee will stop spam, phishing, and viruses sent via email as well as queue messages if you have an outage. If a message

is deemed high risk, the message is automatically removed without the end user given the option to allow/read the message.

- Outbound security is controlled by Untangle web/spam/phishing filter. Outbound threats found are automatically blocked and the end user is given a message that the site had been blocked. We have also blocked certain high-risk countries from accessing your network at all.

Sheffield Campus, Lorain Extension, Elyria Extension

Computer files:

- Students, Staff and Faculty are granted access to our Canvas instance via LDAP authentication with the onsite servers.
- Students do not have access to store data on network server.
- Staff and Faculty have access to network folders based upon their job requirements.
- Student records are kept on a Cloud Server, granting authority to access is Cloud Workspace is limited to certain people and individuals must complete training prior to gaining access. Access to individual database and areas within the database is limited based upon job requirements.
- A daily back up is taken.
- Users are put into groups and are given permission as their job requires.

Student paper files:

- Current student files are manually stored and are locked in a fire proof cabinet in the Registrar's office.
- Student Education Records are scanned and stored on a local network drive. Access is limited based upon job requirements.
- FA records are stored in in the Financial Aid office.
- FA Records are scanned and transferred to the Corporate Office via a VPN, Virtual Private Network.
- Student FA award letters are stored on a network drive and backed up weekly.
- Only FA personal has right to these files.
- All students in the Trucking program have their academic file scanned and transferred to the Corporate Office via a VPN, Virtual Private Network.

Dayton Campus

Most of the student information at the Dayton campus is handled at the corporate level and RadTech.

Columbus Campus

Most of the student information at the Columbus campus is handled at the corporate level and RadTech.

OHIO BUSINESS COLLEGE/TRI-STATE EDUCATIONAL SYSTEMS, INC.
INCIDENT/ACCIDENT REPORT

(Please Print or Type)

PART I (To be completed by CSA or supervisor) **Employer Information:**

Prepared by _____ Job Title _____

Company Name _____

Street Address _____

City, State, Zip Code _____

Phone Number (Including Area Code) _____

PART II (To be completed by student/employee/visitor) **Personal Information:**

_____ Student _____ Employee _____ Visitor

Name _____ Job Title _____

Home
Address _____

City, State, Zip Code _____

Phone Number (Including Area Code) _____

Age _____ Date of Birth _____ Social Security No. _____

PART III (To be completed by student/employee/visitor) **Description of Incident/Accident:**

Date ____/____/____ Did incident occur on company premises? Yes / No. Address of location:

Where on premises did incident occur? _____

Date of incident: ____/____/____ Date reported: ____/____/____ Time of Incident: ____AM/PM

What were you doing when the incident occurred? (Be specific. If using tools or equipment, name them and tell what you were doing with them.) _____

Explain how the incident occurred. List events that resulted in injury or illness, what happened, how it happened and name objects and how they were involved (use a separate sheet if necessary) _____

- OVER -

If injury or illness occurred describe the nature of injury/illness and body part affected_____

Describe the specific cause of the injury or
illness_____

Names of Witnesses:_____

PART IV (To be completed by supervisor) Physician/Health Care Professional Information:

Name of Physician or Hospital_____

Street Address_____

City, State, Zip Code_____

Signature of Injured Person_____

Signature of Person Preparing Report_____