

## **Chancellor's Model Implementing Procedures for VSCS Policy 504: *Campus Safety Policy***

These implementing procedures provide a model for each institution within the Vermont State Colleges System, along with the Chancellor's Office, to adapt and implement its own campus- or institution-based procedure for ensuring that buildings, grounds, facilities and equipment are safe for students, employees and visitors, that the campus community receives adequate training to prepare for and assist in the event of an emergency, and that employees are able to identify and avoid workplace hazards. As a foundational principal, these procedures require the assessment, identification and remediation of safety concerns, together with the obligation to provide regular and ongoing trainings on campus safety, and maintain and report accurate records of these efforts. The Chancellor's Office, with input from the member institutions, shall update these model procedures from time to time for use by the member institutions.

### **I. Student, Employee and Visitor Safety and Security**

Campus safety for the core population of students, employees and visitors is a central concern. The institution will focus its efforts on the following areas:

**A. Building Access** – The institution will regularly [but no less than on a monthly basis] assess the means of appropriately limiting access to campus buildings. These efforts should include determining how effective existing access controls (e.g., keys, card swipes, building monitors) are, along with identifying areas of concern and developing plans to address such concerns. This process should also include an ongoing inventory of existing master keys and access cards and an assessment of the process for creating new keys and cards.

**B. Campus Monitoring** – Together with regular tours of campus by Public Safety personnel, the institution should assess and provide for the strategic use of cameras and other technology as a means of monitoring areas of campus, both inside building common areas and in exterior spaces. This effort should include a staffing structure, with participation from Public Safety, Facilities and Information Technology staff, to assess and monitor such systems on a regular basis.

**C. External Safety** – The institution will regularly [but no less than on a biannual basis] assess its external campus safety and take reasonable steps to remedy identified areas of concern. This assessment should include:

1. The adequacy of campus lighting in parking lots, on building exteriors and surrounding streets and walkways.
2. The sufficiency and operability of existing campus alarms ("blue lights") and emergency telephones.

3. The efficacy of physical controls for vehicle entry onto campus and into residential and instructional areas of campus and other sensitive areas on campus. This assessment should include a cost/benefit analysis of adding such controls.

4. The ability to respond to large group events (e.g., concerts, fairs, protests, speakers) on campus, including defining appropriate areas for such group gatherings, developing primary and emergency routes of ingress and egress, and identifying monitoring locations for medical and public safety personnel.

**D. Fire Safety** – The institution will regularly monitor and ensure that fire alarms, smoke detectors and fire suppression systems are operative and appropriately placed throughout campus.

**E. Remediation Planning and Staffing Assessment** – For any areas of concern identified through the assessment activities required above (subsections A-D), the institution shall establish a plan for addressing such areas through reasonable means, taking into account (as appropriate) the importance of the identified need, the existing safety measures already in place, the complexity of the identified solution(s), the availability of alternative remedies, and time and resource constraints. Additionally, the institution should regularly assess the adequacy of its current safety personnel staffing, including areas of expertise, surge capacity and back-up capacity.

**F. Campus Security Committee** – Each institution may establish a committee to address campus security, with diverse membership drawn from public safety, facilities, student life, and IT, along with faculty and staff representatives. Such committee should regularly review campus safety reports, including incident reports (as appropriate) and safety assessments, establish basic security standards for campus buildings, other public areas on campus and the institution's vehicles and equipment, and make recommendations for improvements to campus security.

**G. Public Information** – The institution will ensure that emergency information, including contact information for public safety, first responders and local law enforcement, is publicly available, prominently displaying such information in appropriate places on its website and publicly posting it in common areas on campus.

**H. Safety Training** – As part of all new student and employee orientation, the institution shall provide training on campus safety, including identifying security resources and providing techniques for staying safe on campus.

## **II. Workplace and Equipment Safety**

The institution strives to keep its employees and other members of the campus community safe from hazardous conditions, including health and safety concerns, on campus and in the workplace.

**A. Hazardous Conditions** – The institution should take the following steps to remedy hazardous conditions on campus:

1. Undertake a regular assessment, no fewer than [four] times a year, to identify any hazardous conditions in the workplace, including general working spaces, campus streets, walkways, ramps and steps, and campus equipment. Special attention should be paid to the upkeep and repair of accessibility elements.
2. Establish a regular training and reporting protocol for staff to recognize, avoid and report hazardous conditions in their workspace or elsewhere on campus.
3. Develop training and safety standards for the operation of potentially hazardous equipment.
4. Incorporate remediation of hazardous conditions into the institution's capital or operations budget to enable rapid correction of identified hazards, as necessary.

**B. Health and Safety Plan** – The institution will work to ensure compliance with applicable workplace health and safety laws and regulations, including requirements for employee training and accident/injury reporting. The institution will develop and maintain a system for accepting and addressing employee concerns regarding health and safety issues in the workplace.

### **III. Emergency Preparedness and Response**

The institution will take all reasonable steps to plan for and respond to emergency situations as they arise. Regular and thorough preparation is a key factor in successful emergency response, and in recognizing this, the institution will undertake a comprehensive emergency preparedness plan.

**A. Emergency Operations Plan** – The institution will adopt, maintain and periodically revise an Emergency Operations plan (EOP).

1. The EOP must cover multiple emergency scenarios, including, by way of example, severe weather, active shooter, campus unrest, public health threats, medical disasters, natural disasters and terrorist threats.
2. The EOP must identify an Emergency Operations Team to prepare for and manage the response to a given emergency. In determining the membership for the Team, along with executive leadership, the institution should consider personnel with knowledge of: public safety, student and residential life, facilities

and physical plant, information technology, human resources and external relations. This Team should meet quarterly to review and assess the existing EOP in light of any emergency or potential emergency events that have occurred on campus or at other institutions.

3. The EOP should include specific contact information for external partners, including local law enforcement, Vermont State Police, FBI, Vermont Department of Emergency Management, local hospitals and other healthcare providers, and the Vermont Department of Health.
4. The plan must identify the emergency operations center, including a back-up location.
5. The plan should identify the information and communications resources necessary for responding to a given emergency, together with back-up communications plans.
6. The plan should include a process for after-action reviews of every significant emergency response involving the EOP, including training exercises.
7. The plan should be reviewed and updated on an annual basis by the Emergency Operations Team, and the institution's executive leadership, as necessary.

**B. Emergency Alert System** – The institution will establish and maintain an emergency alert system involving multiple means of communication (e.g., text messages, emails, alarms, signs, posters, telephone calls). This system will be available as a means of providing both timely warnings and emergency alerts, as required by federal law.

1. **Timely warnings** – Must be issued for certain crimes committed on or near the campus, as required by federal law, where there is a serious or continuing threat to students and employees. The institution must issue the warnings as soon as it receives credible, pertinent information regarding the crime, and the warning must be intended to reach the entire geographic area affected. When issuing a timely warning, the institution must include a report to local law enforcement.
2. **Emergency Notification** – Must be issued when there is any significant emergency, imminent threat or other dangerous situation on campus or one that could, in the institution's reasonable judgment, endanger students, employees or visitors to campus. The institution must issue an alert immediately upon confirmation of the emergency or dangerous situation. The notification should be sent to the entire campus or the affected portion of campus and should contain

information about how students and employees should respond to the emergency or dangerous situation.

3. The institution will develop a procedure for determining when to issue a timely warning or emergency notification and the contents of such a notification.

4. The institution will develop and implement a system for providing effective notice to its students, employees and visitors, including obtaining consent (or requiring an opt-out) to contact students and employees via electronic means.

**C. External Coordination** – The institution shall establish and maintain contacts with local emergency agencies, including local law enforcement and special investigation units, and local emergency responders and healthcare providers. This contact information should be reviewed and updated, if necessary, on an annual basis. Where appropriate, the institution, or the VSC, should enter into memoranda of understanding outlining the relationship between the institution and the emergency personnel, including roles and responsibilities in the event of an emergency. The institutions should make efforts to review any memorandum of understanding with the partner agency on an annual basis.

**D. Emergency Training** – The institution will undertake regular training to prepare for emergency situations. Subject to staffing levels and personnel availability, this training should include:

1. An annual table-top exercise to talk through the EOP with the Emergency Operations Team and executive leadership and assess how well the institution would respond to a major emergency.

2. Periodic full-scale simulations of emergency events, including carrying out the EOP on a true-to-life scale.

3. Regular training for all staff and faculty on emergency procedures, providing access so employees can gain familiarity with the EOP.

4. Identifying external training opportunities on emergency preparedness for members of the Emergency Operations Team and other employees.

5. Coordinating with other VSCS member institutions and the Office of the Chancellor on joint training opportunities, including full-scale simulation trainings and trainings offered by external partners.

**IV. Threat Assessment** – The institution will establish and maintain a Threat Assessment and Management team (TAM) to respond to actual and potential threats to campus safety posed by students, employees or community members.

**A. TAM Membership** – Together with appropriate executive leadership, the TAM will include individuals with experience in public safety, student and residential life, human resources, mental health counselling and academics. Additional personnel and outside experts may be asked to participate in threat assessment as the specific situation requires.

**B. Threat Assessment Procedure** – The institution will develop a procedure for identifying and assessing potential threats to the campus population. This procedure should include regular TAM meetings [on at least a monthly basis] and the development of a threat assessment tool for gathering information and determining the potential threat level an individual poses. As appropriate, the procedure should include the factors the TAM considers when choosing to engage outside threat-assessment assistance or external resources via the VSCS General Counsel’s Office.

**C. TAM Education** – The TAM should develop public information to educate the campus community, as it deems appropriate, about available resources for individuals concerned about campus safety, including mental health counselling and the TAM.

## **V. Reporting**

As part of a comprehensive campus safety policy, the institution will, in all instances, endeavor to comply with the requirements of federal law and will provide regular reports on the main issues of campus safety.

**A. Clery Disclosure and Annual Security Report** – Pursuant to federal law, the institution shall annually prepare its Disclosure of Campus Security Policy and Campus Crime Statistics. This Clery report should be provided to the Office of General Counsel for review no later than September 15 each year. The institution should formally submit and post the report and crime statistics on or before October 1 of each year.

**B. Annual Safety Report** – The institution shall prepare an annual report detailing for the previous calendar year the number of Clery-reportable offenses, employment- and student-related accidents, Vermont Occupational Safety and Health (VOSHA) citations and any other regulatory agency’s safety citations. This report shall be submitted to the Board of Trustees by November 1 of each year.

## **VI. Record-keeping**

The institution shall establish and maintain a procedure for retaining all safety and security records in compliance with VSCS Policy 209: *Records Retention Policy*, including:

- A.** Incident reports
- B.** Campus safety reviews
- C.** Health and safety plan reviews
- D.** Workplace accident/injury reports
- E.** Hazardous condition reports and remediation
- F.** Threat Assessment and Management team reviews
- G.** Emergency Operations Plan reviews and after-action reports
- H.** EOP trainings
- I.** Campus health and safety trainings

Date	Version	Revision	Approved By
8/10/18	1.0	Approved	Jeb Spaulding