



Oxford Community Schools

District Assessment Report

Prepared for: Oxford Community Schools

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1. INTRODUCTION AND BACKGROUND

This Secure Education Consultants (herein 'SEC') security assessment report is being presented to Oxford Community Schools (herein 'Oxford or OCS') to assist in ensuring that Oxford continues to provide a safe and secure environment for its students, staff, and visitors. This report follows a comprehensive examination of OCS' policies, procedures, and current physical operations, as they relate to safety, security, and emergency preparedness.

Oxford Community Schools consists of one early learning school, five elementary schools, one middle school, one high school that includes an early college pathway, two alternative schools, and one virtual academy. OCS educates approximately 7,100 students in grades K-12 and employs approximately 1,100 staff. In addition to assessing the school facilities, SEC examined the Administration and Transportation buildings as well for a total of 17 facilities assessed.

The approach taken for this security assessment was to review the current situation and the applicable security measures in place by conducting physical site inspections, reviewing policies and procedures, interviewing key personnel, and an evaluation of available external information. It is important to note this review is limited to analysis and recommendations of safety and security and will not examine or opine on any incidents.

Oxford Community Schools's level of preparation, emergency planning, and related safety and security operations is among the best observed by SEC in general. The district and building administrators have taken appropriate steps to ensure the students, staff and facilities are protected and prepared for critical incidents and emergencies. This assessment confirmed that the vast majority of the elements necessary for a safe school district are in place and are being properly utilized. The district's commitment to safety is clear at all levels.

2. METHODOLOGY

The analysis identified strategic opportunities to increase Oxford operational control and efficiency in predicting, mitigating, and responding to disruptions, continuity, and security issues. It is recommended that the findings detailed herein be used as a basis for further examination and discussion among key leadership within OCS and be used for possible remediation and mitigation strategies, policies, and procedures.

The SEC security assessment team included the following individuals:

- Jason Russell, President
- Sharon Connolly, Administrative Support

The SEC team was onsite for five days and spent another three days reviewing relevant documentation and discussing findings as a team.

The SEC assessment process included the following methods for gathering information related to the security assessment:

- Interviews with key leadership/management, and staff
- On-site vulnerability assessment
- Document reviews

As part of the security assessment, the SEC team met with representatives from the district as well as each school assessed. SEC also met with the school district's School Resource Officer (SRO) to discuss policies, procedures, and areas of concern. In addition, SEC reviewed security documentation and toured all district buildings.

Using inquiry, observation, and a review of documents, SEC analyzed Oxford’s security capabilities and practices and developed findings based on best practices and SEC extensive school safety and security experience to improve the overall safety and security where applicable.

This report does not offer an opinion on the likely impact of the failure to address a particular issue could have on general safety and security of the OCS or the occupants of its facilities. The characterization of findings in this report does not address or opine on the likelihood of a particular threat.

Interviews

SEC consultants conducted targeted interviews with key personnel including school and district level personnel. SEC found the staff in all areas to be cooperative and forthcoming with information and documentation as requested. The priority of all Oxford staff was clearly the safety and security of students. There was no reluctance to share information or ideas, and it was felt that the open nature of the communications was a reflection of everyone’s desire for continuous improvement and building on the foundation of the programs in place.

The interviews established a solid foundation for understanding the various components that make up the Oxford Community Schools culture and environment, and how security and emergency response are approached within the environment. Interviews included but were not limited to the following:

EMPLOYEE	TITLE	SCHOOL
Ken Weaver	Superintendent	District Administration
Jill Lemond	Assistant Superintendent	District Administration
Steve Wolf	Principal	Oxford High School
Dacia Beazley	Principal	Oxford Middle School
Aletha Vanloozen	Principal	Bridges Alternative School
Paul McDevitt	Principal	Leonard Elementary School
Brad Bigelow	Principal	Clearlake Elementary School
Kristin Guinn	Principal	Lakeville Elementary School
Janet Schell	Principal	Oxford Virtual Academy
Chad Boyd	Principal	Daniel Axford Elementary
Jeff Brown	Principal	Oxford Elementary School
Ann Robb	Director	Oxford Early Learning Center

Each interviewee demonstrated in-depth knowledge of the safety and security processes and elements of his/her school.

The interviewees were asked questions related to security, access controls, external and internal threats, prior security-related events, policies and procedures, communications, and emergency response. They were also asked an open-ended question relating to risk at Oxford Community Schools.

The interviews assisted in guiding the assessment to ensure all concerns were considered.

Policies and Procedures Assessment

Up-to-date policies and procedures are the backbone of an effective security risk program. Once established, everyone in the organization must be made aware of them and understand the consequences of not adhering to them. SEC reviewed current policies and procedures related to emergency response. SEC reviewed relevant procedures that could affect safety and security of students, staff, facilities, and events.

Document Review

The SEC document review included the following documents provided by the Oxford Community Schools:

Administrative Guidelines

AG Number	Descriptor
7430	Safety in Schools
8400	School Safety
8410a	Early Warning Signs of Possible School Violence
8410b	Identifying and Responding to Imminent Warning Signs
8420	Emergency Situations at School
8420c&d	Homeland Security

Board Policies

PO Number	Descriptor
1217 3217 5772 5780 7217 8142.01	Weapons
1662 3362 4362	Anti-Harassment
3120 3121 4120 4121 8142	Criminal History Record Check
1613 3213 4213	Student Supervision and Welfare
3120.08 or 3120.09	Volunteers
3362.01	Threatening Behavior Towards Staff Members
3362.02 4362.02	Workplace Safety
5136 7540.03 7540.04	Personal Communication Devices
5517.01	Bullying and Other Aggressive Behavior Towards Students
5520	Disorderly Conduct
5531	Student Assistance Programs
5540	Interrogation of Students
5630.01	Student Seclusion and Restraint
5771	Search and Seizure
7430	Safety Standards
7440	Facility Security
7440.01	Video Surveillance and Electronic Monitoring
7510	Use of School Facilities
7540.03	Student Technology Acceptable Use and Safety
7545	Electronic Communications
8321	Criminal Justice Information Security
8400	School Safety Information
8405	Environmental Health and Safety Issues

8420	Emergency Situations at Schools/Emergency Evacuation of Schools
8462	Student Abuse and Neglect
9150	School Visitors

Site Inspection

Findings noted during the site inspection are referenced throughout this report. Areas of focus during the site inspection included:

- Environment
- Building Access - Employee, Visitor, Contractor, Vendor
- Interior
- Exterior
- Communication
- Grounds
- Parking Lot
- Entry
- Emergency Drills
- Emergency Operations
- Training
- Emergency Equipment and Supplies
- SRO Operations
- Security Operations
- Security Systems/Video Surveillance

3. OXFORD COMMUNITY SCHOOLS COMMON FINDINGS

1. SEC found the schools to be equipped with the Pre-Plan Live alert system. SEC found a general lack of understanding of the purpose and potential use cases for this system. Many administrators believed this system was a direct alert to Law Enforcement. An analysis of this system revealed its purpose is limited to an internal alert system. The system allows for a staff person to initiate an alert that will notify the office of a location in which there is a potential emergency. SEC recommends that clarification be provided to all staff on the use of this system and when it would be appropriate to deploy this warning. The lack of general clarity of this system could cause miscommunication during an emergency. In addition, SEC recommends that if the intent is to use this system during an emergency it should be used during any drills corresponding to that emergency.
2. SEC found the district has “stop the bleed” emergency kits in the majority of classrooms across the district. SEC recommends that some kits be added to common areas including hallways and larger gathering areas. The kits should be readily accessible and easily identified for use in an emergency. SEC recommends training on the kits be provided when appropriate to staff.
3. SEC found OCS utilizes the “Nightlock” door barricade device. SEC recommends that additional removal tools be provided to each school. As a general rule there should be one removal tool for every 20 devices. In addition, selected administrators and staff should be trained on the use of the removal tools and their locations should be readily identifiable to administrators and responding emergency personnel.

4. The primary form of alert at many of the schools is the PA system. It is critical that access to the PA system be simple and that all staff know how to access and have been empowered to alert for any emergency. The current system at each school consists of a staff person entering a code into the phone that dials multiple phones in the office. The office staff person then accesses the PA system to make the larger alert. This process has a potential failure point if the office phone is not answered. There is also a potential for communication failures or confusion in this step. SEC further recommends that in any areas in which the potential for increased ambient noise could impact the ability to hear the PA that the district consider a visual alert such as a strobe. The district should also ensure that any commonly used exterior areas have speakers that allow for staff, and students outside to hear the PA system. This would include installation of exterior speakers in any courtyards or other areas where staff and students might be. Consideration should be given to both audible and visual alerts as students commonly wear headphones or earbuds and audible alerts cannot be heard in every situation.
5. Oxford has established relocation/reunification sites for each school. It is appropriate that the schools ensure that each site is refreshed on their role yearly to ensure they know they have been chosen at a relocation site and for the district to ensure it has the appropriate access and contact information.
6. SEC recommends OCS consider adding additional evacuation supplies to their “go-kits”. This would include mylar blankets in the event of an evacuation or an emergency during the colder months of the year. In the event of an evacuation many staff and students will not have time to gather personal belongings including coats.
7. SEC found that, in general, the classroom doors in the district were, for the most part, kept locked. SEC recommends that the district implement and enforce consistent policy for the locking of classroom doors. SEC recommends that the doors remain locked at all times or locked but propped to facilitate movement back into classrooms.
8. OCS has designated primary relocation sites for their schools but have not identified secondary relocation sites for use in the event of a regionally impactful emergency. SEC recommends secondary relocation sites should be researched and established for each OCS location. Alternatives to other education sites should be explored since those sites could be on Lockdown or Lockout also depending on the situation. SEC recommends that OCS, working in conjunction with OCS SROs and other related jurisdictions, continue to refine their reunification protocols. SEC recommends that, minimally, these protocols contain the following elements:
 - a. Identifying on-site and off-site reporting locations for parents, guardians, or emergency contacts
 - b. Ensuring short notice access to the site throughout the school day
 - c. Ensuring sufficient vehicular parking and approach routes
 - d. Positioning “greeters” to meet arriving parents, guardians, or emergency contacts
 - e. Communicating via two-way radio or cell phone of the arrival of these individuals
 - f. Escorting these individuals in small groups to where the students are or vice versa
 - g. Maintaining accountability procedures throughout the entire reunification process
 - h. Identifying one location within walking distance in the event that bus transportation is not available due to traffic, weather, or other unforeseen conditions
 - i. Including rehearsal of the reunification process with ongoing critical incident response training including walk-throughs of the designated reunification location for each respective school site along with movement to same
 - j. Including transportation with any reunification rehearsal for each site
 - k. Maintaining annual contact, confirming IT integration, and ensuring accessibility with respective reunification site(s)

- i. Prepositioning related documents and equipment for reunification related operations or assembling “go-kits” of same
9. SEC found OCS does have a formal Behavioral Threat Assessment Process in place. Research has shown that most school based targeted violence attacks are preceded by threatening or concerning behaviors. SEC recommends OCS continue to establish and train threat management teams. These teams should be multi-disciplinary and the process they follow to evaluate the threat level of a student should be documented. SEC further recommends that all staff continue to be trained to identify and how to report concerning behavior of students.
10. SEC recommends OCS continue ensuring that all support and ancillary staff are trained on emergency response. This would include coaches, food service, custodial and maintenance staff, bus drivers, and regularly used substitute teaching staff. Providing training to all levels of staff is critical to ensure consistency in response and protection of all in the OCS system.
11. SEC recommends the front desk staff be provided training on de-escalation strategies as well as training on identifying verbal and non-verbal warning signs of potential danger. This training should initially be provided in a formal in person setting with updates online.
12. SEC recommends that OCS request additional training on the current camera system from the vendor. The system has numerous features available that are not all being used at each school. SEC found that in general the knowledge of the camera system varied at each school and many staff members weren’t comfortable utilizing the system. In some schools, staff members had to contact IT to review footage. The cameras utilized by OCS are among the best, but not all the available functionality is being utilized. SEC recommends that ongoing training be a part of any vendor contracts involving cameras and access control systems.
13. The use of exterior door numbers at schools is a best practice. This allows both occupants and emergency responders to identify locations more efficiently for entry. However, the interior numbers are often on the farthest set of exterior doors even in situations where there is an exterior and interior set at the same entrance. SEC recommends at doors in which there are two sets of doors the numbers be placed on the most interior set of doors. SEC further recommends OCS have staff write their closest exterior door number on their emergency plan flip charts. In addition, SEC found circumstances where exterior door numbers were missing. SEC recommends over time replacing the current numbers with larger numbers as the current ones are hard to see from any distance.
14. SEC found the district has armed security working within some of its schools. The district has established policies and procedures for these armed staff persons. SEC recommends the district consider some additional identification markings for these armed staff. In the event of an emergency any armed staff should be readily identifiable to responding law enforcement to ensure there is no confusion or misidentification incident. The staff wear plain clothes and this identification does not have to be visible at all times but could be something deployed only during an emergency. In larger scale events multiple police jurisdictions might respond to an incident so having obvious and visible markings is critical. SEC further recommends that communication between the armed elements on site be consistent to ensure there is proper coverage of the schools
15. SEC recommends some resources be allocated to planning for after school events like athletic events and other extracurricular activities. The planning should ensure that command and control as well as communication is detailed to ensure staff know who is in charge during emergencies and how communication will be accomplished.

16. SEC recommends a formal process be developed for granting entry into an OCS facility. This process should be used for visitors who are not commonly known to the office staff granting entry, or when they have credible intelligence that a known person could potentially present danger to students or staff. As part of the process, the person granting entry must ask the visitor for their name and the purpose for their visit. The staff person should also, whether through direct line of sight or CCTV cameras, look for concerning non-verbal warning signs. Staff should attempt to verify the purpose for the visit prior to granting entry into the school. SEC recommends that when there is no valid reason for the visit the entry should be denied, and the visitor given other alternatives such as a phone number to call. If there is more than one person in the entry area all should be vetted prior to disabling any locking mechanisms. SEC recommends that direct line of sight is a better option for staff to observe the entry. This eliminates the limitations of viewing a person via CCTV. This simplification will reduce the workload of front desk staff and allow them to better focus their attention on implementing a more thorough process at the primary access control point.
17. OCS has installed safety and security film on many of its entrances and exterior glass. While this film is appropriate for delaying a forced entry, it is also a barrier for law enforcement to gain entry when needed during an emergency. OCS should communicate with potential responding agencies to identify which glass could be used as an access point if needed.
18. When possible, it is recommended front office staff be provided a view of selected cameras via a dedicated monitor. This would allow more real time monitoring of key potential threat areas. This would include any camera view of a person approaching the entry.

4. SUMMARY

SEC believes that Oxford Community Schools has done a remarkable job in developing and executing the extremely comprehensive safety and security plans and it currently provides very safe and secure environments for staffs and students. It was obvious to SEC that there has been a significant amount of thought and effort put in to successfully integrating sound physical design features with comprehensive policies and procedures. It was evident during the site visits OCS has developed a strong and productive working relationship with local police partners that has enhanced the ability to prevent or respond to emergency situations. SEC commends Oxford Community Schools on its strategy to enhance existing physical security measures and to expand on both safety and security related equipment and emergency protocol training regimens. SEC appreciates the opportunity to work with Oxford Community Schools and hopes the recommendations found within this document contribute to these schools' safety and security initiatives.