

ALTOONA BEAUTY SCHOOL, INC.

CAMPUS SECURITY, CRIME STATISTICS AND SEXUAL MISCONDUCT POLICY

Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act), and the Safe and Drug Free Schools and Communities Act (DFSCA): Policies, Reporting, Warnings, and Notifications

The Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, more commonly known as the Clery Act, is contained (along with other security-related disclosure requirements) in section 485 of the Higher Education Act, codified at 20 U.S.C. 1092. It requires all postsecondary education institutions to keep records and report annually on the nature, date, time, and place of crimes occurring on campus, including hate crimes. It also prescribes a number of security-related protocols for emergency response procedures, timely notifications for on-campus crimes, etc. On March 7, 2013 President Obama signed the Violence Against Women Reauthorization Act of 2013 (VAWA). Among other provisions, this law amended the Clery Act to require post-secondary institutions to include in their Annual Campus Security Report all instances of domestic violence, dating violence and stalking; and instances of gender identity and national origin crimes which fall under the category of Hate Crimes.

Clery Act crimes consist of, but not limited to; criminal homicide (murder and negligent/ non-negligent manslaughter), sexual harassment, hostile environment caused by sexual harassment, sexual assault (sexual contact and sexual intercourse), domestic violence, dating violence, sexual exploitation, stalking, retaliation, intimidation, robbery, aggravated assault, burglary, motor vehicle theft, arson, hate crimes (including larceny theft, simple assault, destruction/damage/vandalism of property that are motivated by bias), liquor law violations, drug law violations, and carrying illegal weapons. Definitions of Sexual Misconduct:

1. Sexual Harassment conduct on the basis of sex that satisfies one or more of the following;
 - An employee of the recipient conditioning the provision of an aid, benefit, or service of the recipient on an individual's participation in unwelcoming sexual conduct,
 - Unwelcomed conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to recipient's education program or activity, or
 - "Sexual assault", "Dating Violence" "Domestic Violence", or "stalking" as described for VAWA purposes.
2. Domestic Violence – a felony or misdemeanor crime or violence committed
 - By a current or former spouse
 - By a person whom the person 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 domestic or family violence laws of the jurisdiction in which the crime or violence occurred
 - By another person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of jurisdiction in which the crime or violence occurred
3. Dating Violence is violence committed by a person who is or has been in a social relationship of romantic or intimate nature with the victim
4. Sexual Assault an offense that meets the definition of rape, fondling, incest, or statutory rape as used in the FBI's Unified Crime Reporting (UCR) Programs
5. Stalking engaging in a course of conduct directed at a specific person that would cause a reasonable person to,
 - Fear for the persons safety or the safety of others or
 - Suffer substantial emotional distress
6. Affirmative Consent an affirmative, conscious, and voluntary agreement to engage in sexual activity.

Altoona Beauty School's commitment to safety and security includes:

- Provide a secure and crime free environment for students, faculty and staff
- Performing regular evaluation of security programs
- Monitoring and following up on each crime reported at the Altoona Beauty School

- Any complaint received; Altoona Beauty School will attempt to prevent the reoccurrence without initiating formal action. Ex: Increase monitoring, supervision, provide training, and educational materials for students and employees.
- All information regarding crimes given to any Altoona Beauty School staff member must be reported to Title IX coordinator.
- Altoona Beauty School will attempt to keep any reports of crimes confidential. All reports will be case by case. Depending on immediate threats, confidentiality may be broken as local authorities may be contacted.
- This decision will be determined by the Title IX coordinator.

Altoona Beauty School's Title IX Coordinator is the School Director, Kimberly Smith. Her role as Title IX Coordinator are;

- Hear/receive information of alleged crimes that are reported to her in good faith by others or reported alleged crimes that may personally witness. Under the Clery Act, a crime is "reported" when it is brought to the attention of an Altoona Beauty School staff member or local law enforcement personnel by the complainant, witness, or third party or even the respondent. It doesn't matter whether or not the individuals involved in the crime, or reporting the crime, are associated with Altoona Beauty School.
- Upon receiving information regarding a crime, the Title IX Coordinator will review the complaint. All complainants must file a written document. She will pass on information to the Investigator who will review Altoona Beauty School security camera footage and document notes of the incident. She will ask pertinent questions to those involved, if warranted she will immediately contact the police and provide all related details to the authorities. No information will be withheld. Investigation will commence in a timely manner. Length of an investigation may vary due to law enforcement investigations.
- Record information about crimes reported to them. To record information; complete a Campus Security Authority Incident Report Form. (Kept in binder of Title IX Coordinator's office)
- Promptly report any Clery-Act related crimes to local and/or state police departments – all crimes MUST be reported.
- Attend required training on the implementation of Violence Against Women Act (VAWA), Clery, and Sexual violence acts.
- Provide annual training and updated Campus Security information to all Altoona Beauty School employees

Timely warnings:

The following procedure will be used to notify students and staff of a dangerous situation on the school campus. All Altoona Beauty School employees clocked in for work have their cell phone silenced on their person. They have been trained on how to handle pending emergencies.

Lockdown situation, students and staff are to remain calm and not leave the classroom or building for any reason.

Evacuate = indicates the need to evacuate the classroom immediately and exit through the nearest exit possible.

The instructor will make sure all students/ clients follow instructions. Any Altoona Beauty School Staff can initiate the alert via the ABS App which all students and staff have access to. The Director will notify the police, who will notify the neighboring community of the impending danger. Depending on the particular circumstances of the crime, especially in all situations that could pose an immediate threat to Altoona Beauty School community and individuals, the Director or Administrative Assistant may push a notice via ABS App to every student, staff and faculty member. A copy of this policy is posted on the student bulletin board. Anyone with information warranting a timely warning should report the circumstances to the Director by phone, (814) 942 – 3141 or in person.

A STATEMENT OF CURRENT POLICIES CONCERNING CAMPUS LAW ENFORCEMENT AND POLICIES THAT ENCOURAGE PROMPT REPORTING OF ALL CAMPUS CRIME TO CAMPUS POLICE AND LOCAL POLICE

Altoona Beauty School is essentially a non-residential School and does not have a campus police force. Therefore, all crimes are reported to local authorities and the Title IX Coordinator.

Local authorities will allow a victim or witness to report crime on a voluntary and confidential basis.

Crime Reporting

Efforts are made to inform members of the campus community on a timely basis about campus crime and crime-related issues. Altoona Beauty School's procedure for reporting crimes and other emergencies occurring on our campus are as follows: If a crime or other emergency occurs, the Altoona Beauty School staff has been made aware to call 911

immediately or local police, (814) 949-2489. Title IX Coordinator must be notified and assist in situation if possible. The staff will then attempt to remedy, to our best ability, the situation as well as keeping all students and others calm and safe until help arrives.

How to Report Crimes on Campus

Students and employees are cautioned never to attempt to apprehend or pursue a suspected criminal. Crimes or suspected criminals should be reported to: Criminal complaints, Call 911. Institutional complaints report to the Title IX Coordinator, if appropriate to 911. Immediately report any crimes or suspicious activity by:

- Calling 814-942-3141
- Stopping by the Administration Office
- After business hours call 911, through ABS App, or Instant Message (IM) Title IX Coordinator through Face Book, or email Kim@altoonabeautyschool.com

If you have any doubts about whether to report something that has occurred, report it. Complainants of, or witnesses to, crimes may disclose them on a voluntary, confidential basis to the Title IX Coordinator, which can then determine whether the event constitutes a crime that has to be collected and statistically reported. All crimes should be reported immediately. Always use your eyes, ears and telephone to keep the Title IX Coordinator advised of what you see and hear. Call the Administrative Office when you see;

- Strangers loitering in the office area, hallways, classrooms, or lounge areas, etc.
- Unsecured doors or windows in campus buildings that are supposed to be locked
- Anyone tampering with a motor vehicle or loitering in a parking lot
- Persons publicly displaying a weapon
- Persons loitering in dark secluded areas
- Suspicious persons carrying articles, equipment, luggage, or other packages out of campus buildings

No alternatives to reporting are available.

Crime is a serious problem with no easy solutions. While school staff and security measures may offer assistance regarding safety and security concerns, ultimately the primary responsibility for your personal safety rests with you. Altoona Beauty School prohibits retaliation against any person who files a complaint, or third-party report, or participates in the investigative and/or disciplinary process (i.e.: as a witness). Altoona Beauty School will take strong responsive action if any retaliation occurs.

Safety Tips

- Stay alert of your surroundings, wherever you are.
- If you feel uncomfortable in a place, leave right away
- Keep eyes and ears open, hands free
- Choose busy streets and avoid going through deserted areas
- At night, walk in well-lit areas whenever possible
- Try not to walk or jog alone. Take a friend or walk in a group
- Avoid large sums of cash
- When in public spaces, keep valuable items including jewelry, mobile phone and wallets out of sight.
- Avoid returning to campus after dark, or walk in groups to and from buildings
- Communicate suspicious behavior immediately
- Use of the "Buddy System" when walking to parked cars at night
- Leaving the building in a group when classes are dismissed

Altoona Beauty School crime prevention programs include:

- Periodic review by staff and students of the Altoona Beauty School fire drills and emergency procedures video
- Periodic fire drill of the building for all students
- Training on sexual misconduct

Confidentiality Procedure:

A "responsible employee" is an Altoona Beauty School employee who has the duty to report incidents of sexual violence or other student misconduct to the Title IX coordinator.

When a complainant tells a responsible employee about an incident of sexual violence, the complainant has the right to expect the Altoona Beauty School to take immediate and appropriate steps to investigate what happened and to resolve the matter promptly.

A responsible employee must report to the Title IX coordinator all relevant details. To the extent possible, information reported to a responsible employee will be shared only with people responsible for handling the Altoona Beauty School's response to the report. All Altoona Beauty employees are responsible employees: Linzi Biesinger, Dajah Robinson, Jamie Miller, Kimberly Smith, Jennifer Wilt, Rebecca Westpfahl, Elizabeth Leeper, Lacey Stuller, Lara Sharpless, and Ruth Madden.

Before a complainant reveals any information to a responsible employee, the employee should ensure that the complainant understands the employee's reporting obligations – and, if the complainant wants to maintain confidentiality, direct the complainant to confidential resources. (IE: Attorneys, pastoral counselor, or professional counselor).

If the complainant wants to tell the responsible employee what happened but also maintain confidentiality, the employee should tell the victim that the Altoona Beauty School will consider the request but cannot guarantee that Altoona Beauty School will be able to honor it. Responsible employee will also inform the coordinator of the complainant's request for confidentiality.

Responsible employees will not pressure a complainant to request confidentiality, nor will they pressure a complainant to make a full report if the complainant is not ready to.

If a complainant discloses an incident to a responsible employee but wishes to maintain confidentiality or requests that no investigation be conducted or disciplinary action taken, the Altoona Beauty School must weigh that request against the Altoona Beauty School's obligation to provide a safe, non-discriminatory environment for all students, including the complainant.

If Altoona Beauty School determines that it cannot maintain a complainant's confidentiality, Altoona Beauty School will inform the complainant prior to starting an investigation.

Altoona Beauty School does not have any off-campus locations, or housing facilities, therefore we do not monitor or record criminal activity off campus locations.

The Altoona Beauty School policy on building security is as follows:

The facility is open to the public Mondays through Fridays 8:00am to 4:00pm. Saturdays 9:00am to 3:00pm. All other hours the facility is secured by exterior doors being closed and locked with an alarm system on. Only Staff and Students are permitted to enter and exit the rear door of the building during business hours. Clients are permitted to use the front entrance only. Side doors remain locked at all times and are for emergency use only. There are no residence halls available at Altoona Beauty School.

ALCOHOL AND ILLEGAL DRUGS POLICY

Altoona Beauty School neither endorses nor discourages legal use of alcohol by its members who are at least 21 years of age. Those under 21 are not permitted to consume alcohol under any circumstances on Altoona Beauty School premises or at any Altoona Beauty School event no matter where the event takes place. Altoona Beauty School prohibits the illegal use, possession, or distribution of controlled substances.

Members of Altoona Beauty School community are expected to be aware of and obey state and municipal laws or ordinances regulating the use, possession or sale of alcoholic beverages and federal and state laws regarding controlled substances. Those who are cited for violations of laws or ordinances by state, federal or municipal authorities may also face expulsion or termination from Altoona Beauty School.

ALCOHOL AND OTHER DRUG ABUSE PREVENTION PROGRAM

Research on the abuse of alcohol and the use of illegal drugs by college students indicated they pose a serious threat to the educational environment, which includes not only the campus but the immediate neighborhood and surrounding community. The efforts of Altoona Beauty School are directed primarily toward educating students about the effects of drugs and alcohol and helping them learn to make wise choices. For students who feel their lives are being affected by their own or another's use of alcohol or drugs these students should seek assistance at the Altoona Beauty School offices. Students will be given phone numbers and/or agencies to contact for help. All inquiries will be kept confidential.

A STATEMENT OF CURRENT POLICIES CONCERNING THE SEXUAL ASSAULT PREVENTION PROGRAM AND THE PROCEDURES THAT ARE FOLLOWED.

The Violence Against Women Reauthorization Act of 2013 requires schools to educate students, staff, and faculty on the prevention of rape, domestic violence, sexual assault, and stalking. The institution has several relevant brochures available on display in the Student Breakroom. Additionally, Altoona Beauty School has a sexual assault prevention program that includes, but is not limited to;

- Periodic visit from Home Nursing Agency speaker, providing information on topics such as; Drug and alcohol abuse and its importance. Sexual assaults, rape, etc.
- Periodic visit from Family Services of Blair County to discuss the local Domestic Abuse project and Women's Shelters. Sexual assaults, rape, etc.
- Altoona Beauty School CSCSSM Policy is reviewed annually by all staff at regularly scheduled staff meetings.
- Altoona Beauty School CSCSSM Policy is explained and reviewed individually to all students at their scheduled orientation. A copy of the policy is given to each student.
- If an assault occurs, notify the Title IX Coordinator immediately
- Do Not Disturb Crime scene
- Notify local law enforcement
- Secure counseling for the complainant, or offer a referral to appropriate entities that provide applicable counseling
- Change the academic schedule if complainant requests
- Disciplinary actions include dismissal from the school

The school provides educational programs to enhance awareness of sexual assault. The schools undertake efforts to safeguard the rights and interest of the survivor and pursues sanctions against the perpetrator(s) of sexual assault. The school official will, upon request, arrange transportation to a hospital for treatment and evidence collection, where a rape kit may be obtained; provide notification to an off-campus support and counseling service (Altoona Family Services – 24 hour crisis hotline 814-944-3585 or 800-500-2849); provide assistance in contacting the appropriate law enforcement agency as applicable.

Altoona Beauty School does not tolerate and prohibits sexual assault, sexual discrimination (which includes sexual misconduct) females or males, whether committed by a stranger or by an acquaintance. This includes all programs offered by the school, all school employees, students, visitors to the school and all school sponsored functions. The school attempts to protect members of the school community, including complainants, from sexual assaults and offers any student, faculty, or staff member who survives a sexual assault that occurs within the context of the school community the support necessary to enable them to continue to pursue their academic or career goals.

Response to Reports of Sexual Assault

The school is committed to creating an environment that both promotes and assists in prompt reporting of sexual assault, and to providing compassionate support services for survivors. Students who are the complainants of campus related sexual assault are entitled to certain rights. These rights include, but are not limited to the following;

- The survivor has the right to have their claims treated seriously and to be treated with dignity
- The survivor has the right to be informed of their options with regard to notifying law enforcement authorities and to be assisted in notifying such authorities if they so choose. Because the school recognizes that a sexual assault is more than an assault on the individual's body, but also an attack on the individual's dignity and sense of self, the school is committed to ensuring that the decision to take action against respondent rests solely with the survivor. There may be circumstances however, in which the school must take action to protect the survivor,

or the campus community Federal law requires that the school provide the campus community with timely notice of certain reported crimes and/or acts the institution believes represent a threat to members of the campus community.

- The survivor has the right to be free from undue coercion of any kind from the school's personnel. Such coercion includes but is not limited to pressuring the survivor to report, not to report, or to under report a sexual assault; suggesting that the survivor somehow contributed to or assumed the risk of being sexually assaulted; or suggesting the survivor or the school would incur unwanted publicity or humiliation by reporting the sexual assault.
- Student survivors may choose to change academic arrangements, if such changes are reasonably available, without financial or academic penalty. For assistance in exploring options or to request a change in academic situations, contact the school Director.
- If no contact order is requested by the complainant, local authorities must be contacted.
- Amnesty may be granted regarding a school policy or rule during the alleged crime.

If you are sexually assaulted

- Get to a safe place
- Call the police as soon as it is safe to do so by dialing 911

Reporting the Assault

Students, staff members, or campus visitors, who believe they are victims of a sexual assault, should also contact your Sexual Assault Response Team (SART) - at least one of the following school officials.

- Director/ Title IX Coordinator – Kimberly Smith
- President/ Investigator – Linzi Biesinger
- Admissions Assistant/ Decision Maker – Lacey Stuller

Individuals who have been raped or sexually assaulted should try to preserve all physical evidence. They should not wash, use the toilet, or change clothing, if doing so can be avoided. If oral contact took place, one should not smoke, eat, drink, or brush one's teeth. If one changes clothes, all clothing worn at the time of the attack should be placed in a paper bag, not plastic. Medical attention should be sought as soon as possible to assess any physical injuries, provide appropriate medical treatment, and collect important evidence in the event legal action is taken.

In cases of alleged sexual assault, the complainant and the respondent are entitled to the same opportunities to have others present during campus disciplinary proceedings. Neither the complainant nor the respondent will be required to abide by a non-disclosure agreement. Both the complainant and the respondent shall be informed of the outcome of any campus disciplinary proceeding brought alleging a sexual assault in writing simultaneously (through email within three business days). An accused perpetrator of sexual assault, if determined to be responsible of the accused sexual assault, may be dismissed from Altoona Beauty School immediately.

Grievance /Adjudication Procedure:

- No mediation will be done during sexual misconduct cases
- The preponderance-of-the-evidence shall be used in any Title IX fact finding and related proceedings including hearings. Notice of hearing will be sent to all parties.
- The adjudicators will be Title IX coordinator, Teresa Madigan, Investigator Linzi Biesinger and Decision Maker Kimberly Smith. Any conflict of interest raised by any party will be required to seek outside adjudication such as police department.
- Any parties involved in the adjudication process may bring supporters with them. Only the representatives of the complainant and the respondent may speak during these hearings. Any witnesses and evidence may be presented at the adjudication hearing as long as it pertains to the complaint in question.
- Cross examination allowed only by representatives of complainant or respondent during the hearing.
- Results of the adjudication process will be emailed simultaneously to all parties within three business days.
- The decision of adjudicators will be final.
- Altoona Beauty School will not require a non-disclosure agreement.

The nature of sexual assault, particularly when perpetrated by an acquaintance, makes it difficult for many survivors to report their experience. For this reason, the local Shelters and Women's Service Centers are primary places where individuals may seek assistance in complete confidentiality.

Important Phone Numbers

United States Department of Defense Safe Hotline (877)-994-5247

National Domestic Violence Hotline (800) 799-7233

Crisis Call Center (800) 273-8255

Child Abuse Hotline (800) 540-4000

Home Nursing Agency (800) 445-6262

Family Services of Altoona (814)944-3583

Family Emergency Shelter (814) 949-3778

24-hour Victim Service Hotline (800) 500-2849 or (814)944-3585

Altoona Beauty School staff will provide the student/complainant with information from Family Services of Blair County with regards to counseling, mental health, or other services for complainants of sexual offenses. Family Service of Blair County can also provide ongoing support during the institutional disciplinary or criminal process.

Students/complainants will be advised, if requested and reasonably available, academic scheduling will be adjusted after the alleged sex offense.

Appeals – student may appeal by submitting written appeal to the Director of the school. Student must include in the appeal detailed reasoning and documentation of proof to change the outcome. All appeals will be reviewed, and written determination will be sent to the student. All disciplinary sanctions will be handled by the Pennsylvania State Police and/or Altoona City Police.

SEX OFFENDER REGISTRY AND ACCESS TO RELATED INFORMATION

The federal Campus Sex Crimes Prevention Act, enacted on October 28, 2000, went into effect October 28, 2002. The law requires institutions of higher education to issue a statement advising the campus community where law enforcement agency information provide by State concerning registered sex offender may be obtained. It also requires sex offenders already required to register in a State to provide notice, as required under state law, of each institution of higher education in that State at which the person is employed, carries on a vocation, volunteers services or is a student. Members of the general public may request community notification flyers or information concerning sexually violent predators in Altoona by contacting the Altoona Police Department at (814) 949 – 2489 the Pennsylvania State Police at (814) 696 – 6100. Notice concerning sexually violent predators is also available over the Internet at the Sexually Violent Predators Listing page of the Pennsylvania State Police website at <http://www.pameganslaw.state.pa.us/>

Altoona Beauty School policy on preparing our annual disclosure of crime statistics is as follows:

- October of each year the President and Director of Altoona Beauty School review previous crime reports
- These documented reports are compiled
- Our campus security policies are updated
- All updated information is provided to the USDOE in our annual IPED report electronically

Crimes on campus are reported to the Pennsylvania State Police. The Altoona Police Department has jurisdiction over and reports all incidents of criminal activity by Altoona Beauty School students. Campus crimes should then be reported to the President of Altoona Beauty School, Linzi J. Biesinger and the Director (Title IX Coordinator), Kimberly Smith. However, all reported incidents will be compiled with Altoona Beauty School annual security report.

Altoona Beauty School encourages complainants of sexual violence to speak with someone about the incident that happened. So complainants may get the support they need, and so Altoona Beauty School can respond appropriately.

Complainants Options:

1. Privileged and confidential communicators.
2. Professional and pastoral counselors
3. Responsible Altoona Beauty School Employee = An employee who has the authority to address sexual violence, who has the duty to report the incident. The complainant should expect the Altoona Beauty School take immediate and appropriate steps to investigate. A responsible employee must report all details to the Title IX Coordinator.

In compliance with the Public Law, the following information on campus security is reported for your review. The following offenses were reported to Altoona Beauty School personnel or local police authorities as having occurred on campus:

CRIMINAL OFFENSE – ON CAMPUS

	2020	2021	2022
Occurrence of murders (non-negligent manslaughter)	0	0	0
Sexual Harassment, Sexual Assault or Sexual Exploitation	0	0	0
Robberies – burglaries	0	0	0
Aggravated Assaults	0	0	0
Motor vehicle theft	0	0	0
Hate Crimes (based on race, gender, religion, national origin, sexual orientation, gender identity, ethnicity or disability of victim)	0	0	0
Negligent manslaughter	0	0	0
Larceny-theft	0	0	0
Simple Assault	0	0	0
Intimidation	0	0	0
Vandalism	0	0	0
Domestic Violence	0	0	0
Dating Violence	0	0	0
Stalking	0	0	0
Retaliation	0	0	0

CRIMINAL OFFENSE – PUBLIC PROPERTY

	2020	2021	2022
Occurrence of murders (non-negligent manslaughter)	0	0	0
Sexual Harassment, Sexual Assault or Sexual Exploitation	0	0	0
Robberies – burglaries	0	0	0
Aggravated Assaults	0	0	0
Motor vehicle theft	0	0	0
Hate Crimes (based on race, gender, religion, national origin, sexual orientation, gender identity, ethnicity or disability of victim)	0	0	0
Negligent manslaughter	0	0	0
Larceny-theft	0	0	0
Simple Assault	0	0	0
Intimidation	0	0	0
Vandalism	0	0	0
Domestic Violence	0	0	0
Dating Violence	0	0	0
Stalking	0	0	0
Retaliation	0	0	0