

TIGI HAIRDRESSING ACADEMY CAMPUS SECURITY POLICY

A copy of Tigi Hairdressing Academy Campus Security Policy, as well as 3 years of crime statistics may be found in the Campus Director office. The Campus Security Authority is responsible for the document. The policy was last updated October 1st, 2021.

In addition to the required annual campus security report. The Tigi Hairdressing Academy will provide emergency notification and timely warnings to Team Members and Students of any occurrences of the crimes that are reported to local police agencies and/ or the Campus Security Authority that are considered to represent a serious or continuing threat to our Team Members and Students. As soon as the Academy becomes aware of the crimes, Students and Team will be notified. * These crimes are: criminal homicide, forcible and non-forcible sex offenses, domestic violence, stalking, robbery, aggravated assault, burglary, motor vehicle theft, arson, hate crimes including bodily injury reported to local police agencies that show evidence of prejudice based on race, gender, religion, sexual orientation, ethnicity, or disability, arrests for violations of liquor and drug violations and illegal weapons possession, and persons not arrested but referred for disciplinary action for liquor, drug and weapons law violations. Note: Tigi Hairdressing Academy is not required to provide timely warnings with respect to crimes reported to a pastoral or professional counselor.

Tigi Hairdressing Academy maintains a daily crime log documenting reported crime in accordance with the Clery Act.

Tigi Hairdressing Academy will also provide timely warnings to students and staff if significant emergency or dangerous situation involving an immediate threat to the health and safety of Team Members and Students occurs on the campus. Tigi Hairdressing Academy's goal is to maintain a safe and nonviolent academic and working environment. Please notify a team member immediately in case of a medical emergency or accident. All accidents must be reported to the Director and Campus Security Authority. Detailed Emergency Response Procedures are outlined in this policy.

If a student wants to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics, please contact the Campus Security Authority.

Access to the building is given to Students exclusively during business hours. Any student seeking access outside normal class time must have prior authorization from an administrator. Campus Director, Student Care, and Custodial contractors consider safety and security while maintaining the facility (lighting, pathways, etc)

Tigi Hairdressing Academy empowers Team members and Students to consider security and the security of others at all times. When coming and going from the facility, Students and Team Members should walk in groups.

The Tigi Hairdressing Academy does not have any off-campus locations, therefore all monitoring and recording of any criminal activity is conducted at the campus location.

The Tigi Hairdressing Academy is committed to providing safety to Team Members, Students and guests. This policy describes the precautions and procedure used to ensure campus safety.

- If a crime happens to you or your property or if there is an emergency occurring on campus, contact the designated Campus Security Authority or any available administrator.
- The Tigi Academy will provide Student and Team Members with a copy of the crime report from the previous calendar year by October 1st of the following year. Statistics will be gathered from the local police and compiled in the annual report, The report will show number of incidents only on campus and is divided into the following categories:

OFFENSES: Murder, Non-Negligent Manslaughter, Manslaughter by Negligence, Rape, Fondling, Incest, Statutory Rape, Robbery, Aggravated Assault, Burglary, Motor Vehicle Theft, Arson.

HATE CRIMES: Murder, Non-Negligent Manslaughter, Rape, Fondling, Incest, Statutory Rape, Robbery, Aggravated Assault, Burglary, Motor Vehicle Theft, Arson, Larceny-Theft, Simple Assault, Intimidation, Destruction/Damage/Vandalism or Property.

VAWA OFFENSES: Domestic Violence, Dating Violence, Stalking.

ARRESTS AND REFERRALS FOR DISCIPLINARY ACTION: Weapons: Carrying, Possessing, etc. Drug Abuse Violations, Liquor Law Violations.

The Tigi Hairdressing Academy has assigned a specific Campus Safety Authority in which any Campus Safety and Security concerns can be reported and addressed. The Academy has a working relationship with the Local Police Department who are able to support and provide services promptly in the event of an incident. We encourage accurate and prompt reporting of all crimes to the Campus Security Authority and local police.

EMERGENCY RESPONSE AND EVACUATION PROCEDURES

The Campus Director is responsible for coordinating and facilitating the Emergency Response and Evacuation Plan. If the Campus Director is away. The Administrative team shall facilitate in their place. They will ensure that the emergency evacuation procedures have been informed to the Team and Students. Campus Director, with support of the administrative team will conduct fire drills annually which may be both announced and unannounced. Feedback from these drills will be used to determine the modifications necessary to the evacuation plans.

EVACUATION PROCEDURE

Evacuation should take place if it is determined that it is safer outside than inside the building (fire, explosion, intruder), It must be determined that Team, Students and Guests can safely reach the evacuation location without danger, The Campus Director will call 911 to give notice that the Academy has been evacuated. The Campus Director will communicate the need to evacuate the building

OFFENSES: Murder, Non-Negligent Manslaughter, Manslaughter by Negligence, Rape, Fondling, Incest, Statutory Rape, Robbery, Aggravated Assault, Burglary, Motor Vehicle Theft, Arson

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VAWA OFFENSES: Domestic Violence, Dating Violence, Stalking, Sexual Assault, Rape, Acquaintance Rape

ARRESTS & REFERRALS FOR DISCIPLINARY ACTION: Weapons: Carrying & Possessing, etc., Drug Abuse Violations, Liquor Law Violation

by making an announcement or set off the fire alarm. The evacuation routes will be noted by announcing the preferred exit, based on location of the incident. The Campus Director will communicate when it is safe to re-enter the building.

TEAM MEMBER RESPONSIBILITY

- Coordinate exit route based on the announcement of the Campus Director. Exit Routes can be found on campus and are shown during fire drills.
- Bring Sign in sheets
- Use a secondary route if the primary route is blocked or hazardous
- Help those needing special assistance
- Do not lock classroom doors when leaving

- Do not stop for belongings
- Check common areas for people
- Go to designated evacuation meeting area
- Check for injuries
- Bring sign in sheet to Campus Director and ensure all students, Guests and Team Members are present

LOCKDOWN

Lockdown is the initial physical response to provide a time barrier during an active shooter/intruder event. This procedure should involve barricading the door and preparing a plan of evacuation or counter tactics.

The Campus Director will announce a lockdown by proclaiming "CODE RED". This indicates that the Academy is experiencing an emergency situation and is now under lockdown.

The Campus Director will designate a Team Member to call 911, and provide a description of: business name, address. describe the emergency, intruder description, identification of the weapon- Team Member will stay on the phone to provide updates and additional information.

TEAM MEMBER RESPONSIBILITY

- Clear the hallway and bathrooms by your room. moving everyone into the classroom
- Lock and/or block doors. All moveable items should be used to barricade the door,
- Take attendance. Identify any Students missing from sign in sheet, Team Members missing from roster, and Guests missing from Shortcuts daily schedule (checked in)
- Spread out in the room. In the event that entry is gained by an intruder. all should consider exiting by running past the intruder
- Use methods to distract the intruder's ability to accurately shoot or cause harm, such as loud noises or aiming and throwing objects • Allow no one outside of the classroom until the Campus Director or local law enforcement gives the "All Clear" signal unless a life• threatening situation exists and a safe exit is available
- If Team Members, Students or Service Guests are outside of the campus at the time of a lockdown, they should move to the designated fire drill meeting place or flee to find help.

SHELTER-IN-PLACE PROCEDURE

- The shelter-in-place procedure provides a refuge for Team Members, Students, and any other community members who are in danger, inside the school building during an emergency. Shelters may change depending on the emergency but are generally located in areas of the building that maximize the safety of occupants. including rooms central to the Academy without windows. Shelter-in-place is used when evacuation would place people at risk.

The Campus Director will announce that Tigi Hairdressing Academy is experiencing an emergency situation and needs to implement shelter-in place procedures. Team Members, Students, and any other community members will be directed to move to the designated shelter locations. All doors, windows and blinds should be closed. If warranted, heating, ventilation and air conditioning systems will be turned off, to stop the inflow of outside air into the building. The Campus Director will designate a Team Member to monitor media for information on conditions that caused the shelter-in-place. The Campus Director will contact and consult with public safety officials as possible, and be prepared to announce additional procedures due to changing conditions of the incident, or to announce an "All Clear".

TEAM MEMBER RESPONSIBILITY

- Move all into designated safe areas, focused on interior rooms without windows
- Close classroom doors and windows upon exit
- Instruct all to stay low and prepare to cover their heads to protect from debris, if appropriate to the situation
- All persons must remain in the shelter until notified by the Campus Director or public safety official instruct "All Clear"

BOMB THREAT PROCEDURE

A bomb threat will result in law enforcement and other safety and emergency services responding to the scene. These procedures are created to protect Team Members, Students and Guests in the event of a communicated threat regarding the

presence of destructive devices on the property. This includes explosive devices of an incendiary, chemical, biological, or radioactive nature.

Once law enforcement arrives, it is critical to follow the instructions of, and cooperate with, the law enforcement officers who will have jurisdiction over the scene.

RESPONSIBILITIES OF PERSON WHO RECEIVED THE THREAT

- Make a record of the exact wording of the threat
- Ask: Where is the bomb located? What does it look like? What materials are in the bomb (type of bomb)? How is it activated? When will the bomb explode? Who is calling, name and address? Did you place the bomb? Why are you doing this?
- If the threat is made by phone, listen closely to caller's voice and speech patterns and noises in background. Make a record of anything you hear
- If the threat is made by phone and the caller hangs up, immediately dial to trace the call
- Notify the Campus Director and call 911

The Campus Director will notify law enforcement, fire and emergency services by calling 911. The Campus Director will assign Team Members to meet and BRIEF emergency responders. The Campus Director will notify Team Members, Students and Guests that a building emergency is in effect, and that everyone should remain in their rooms unit advised otherwise. The Campus Director will determine if evacuation procedures should be activated, selecting routes and assembly areas away from the suspicious item. The Campus Director will work with law enforcement to determine further response, based on the circumstances at hand.

Once emergency responders are on scene, decisions must be made to:

- Evacuate immediately, if this has not already occurred and if warranted, selecting routes and assembly areas away from the suspicious item. DO NOT ACTIVATE THE FIRE ALARM
- Speak to the person who received the threat and obtain information
- Search the building
- If a suspicious item is located, order an evacuation
- No one may re-enter the building(s) until fire or police personnel declare it is safe
- After consulting with local law enforcement, the Campus Director shall determine if staff and students should be relocated to an alternative safe site
- Upon law enforcement's clearance, Director will notify Team Members, Students and Guests and resume operations

If an evacuation occurs, students, guests and staff must be evacuated to a safe distance outside of school building(s).

TEAM MEMBER RESPONSIBILITY

- Check classrooms, offices and general areas for suspicious items and report any findings to the Campus Director. If a suspicious item is found-DO NOT TOUCH IT. Secure the area where the item is located.
- Account for Students, bring Sign in Sheets and Team Member Roster
- Evacuate using standard procedures and exit routes to assembly area. Open classroom windows and leave classroom doors open when exiting. Take roll after being evacuated. Be prepared to report the names of any missing persons to Campus Director
- Keep students together at the assembly area until given further instructions. Be prepared to go to off-site relocation if ordered
- Law enforcement will give the signal for return to the building

FIRE RESPONSE PROCEDURE

Tigi Hairdressing Academy has a policy and procedures governing fire drills and conducts fire drills as required by law. All Team is trained on how to respond in the event of a fire.

Any Team member discovering fire or smoke will ACTIVATE THE FIRE ALARM, and report the fire to the Campus Director, or call 911 if conditions require and/or injured are in need of medical assistance. Team Members, Students and Guests will immediately evacuate the building using prescribed routes or alternate routes, determined by the location of the fire.

No one may re-enter building(s) until it is declared safe by the fire department. Once the fire department arrives, all people will cooperate with the fire department personnel who have jurisdiction at the scene.

The Campus Director will call or direct staff to call 911 to confirm the alarm is active, identify business name and location, provide exact location of the fire or smoke, if any injuries are present, and that the building is being evacuated. The Campus Director will ensure that all people immediately evacuate the building using prescribed routes or alternate routes due to the location of the fire. Meeting areas may need to be relocated because of the building collapse or unsafe areas from the fire. The Campus Director will announce any change to assembly areas. The Campus Director will designate Team Members to obtain student rosters and identify any missing Students. The Campus Director will designate a Team Members to account for missing Team Members, as compared to the roster and schedule. Guest Services will use Shortcuts to account for missing Guests- Any missing persons will be provided to the fire department for search efforts, if necessary.

The Campus Director will announce when the building can be re-entered, based on the clearance from the emergency response team.

TEAM MEMBER RESPONSIBILITY

- Take the class roster and first-aid kit and any other supplies or resources relevant to the incident and lead Students as quickly and calmly as possible out of the building to the designated assembly area. Assist others.
- Follow instruction received to use alternate escape routes
- Close the classroom door and turn out the lights
- Take attendance at the assembly area. Report injuries and any missing Students or Team Members to Campus Director and the emergency responders
- Keep everyone together
- Re-entry when declared safe by the fire department

MEDICAL EMERGENCY PROCEDURE

While medical emergencies may vary greatly based on the circumstance, these procedures are in place to provide direction to Team Members. Students and Guests.

TEAM MEMBER RESPONSIBILITY

- Quickly assess the situation, make sure the situation is safe for you to approach (i.e., live electric wires, gas leak, building damage, etc.).
- Call or have someone call 9-1-1 immediately. Be prepared to provide the school's name and address, exact location (floor, room number); describe illness or type of injury; and age of the victim(s),
- Send someone to notify the Campus Director, who will assign someone to wait for emergency responders, notify appropriate family of the situation
- Assess the seriousness of the injury or illness
- Protect yourself against contact with body fluids (blood borne pathogens),
- Administer appropriate first-aid according to your level of training until help arrives
- Comfort and reassure the injured person. Do Not Move an injured person unless the scene is unsafe • Complete Incident Report form and provide to Campus Director for filing.

MISSING STUDENT

Anyone at Tigi Hairdressing Academy who receives a report of a missing Student must immediately contact the local police department and comply with their direction.

DRUG AND ALCOHOL POLICY

School policy prohibits the possession, use and sale of alcoholic beverages to anyone.

School policy also prohibits the possession, use and sale of illegal drugs.

School policy supports and enforces State underage drinking laws.

Students caught in any of the above situations will be withdrawn from the program and will be reported to authorities. Students needing assistance may contact the below substance abuse resources:

Substance Abuse Treatment Referral Service 1 (800) 662-4889

Al-non & Alateen (1(888)425-2666

Alcoholics Anonymous (602)264•1341

SEXUAL OFFENDER REGISTRATION

In accordance with the Campus Sex Crimes Prevention Act of 2000, the Clery Act, and the Family Rights and Privacy Act of 1974, The Tigi Hairdressing Academy is providing information for where students and employees may obtain information regarding registered sex offenders. The Campus Sex Crimes Prevention Act requires institutions of higher education to provide a statement advising the campus community where law enforcement information provided by a state concerning registered sex offenders can be obtained.

COLORADO SEX OFFENDERS REGISTRY: [HTTPS://APPS.COLORADO.GOV/APPS/DPS/SORI](https://apps.colorado.gov/apps/dps/sori)

CAMPUS OBLIGATIONS UNDER VIOLENCE AGAINST WOMEN ACT (VAWA)

Under Title IX, discrimination on the basis of sex can include sexual harassment and sexual violence, which includes sexual assault, domestic violence, and stalking. Any Academy that receives federal funds may be held legally responsible when it knows about or ignores sexual harassment or sexual violence in its programs or activities. The Academy can be held responsible in court whether the harassment or violence is committed by a student or staff.

What is VAWA?

On March 7, 2013, President Obama signed into federal law the Violence Against Women Reauthorization Act of 2013 (VAWA), which is aimed at improving how colleges and universities in the

U.S. address sexual violence. This new law imposes obligations for Colleges and Universities to revise their policies and practices to comply with new regulations that addresses and prohibits acts of violence such as, sexual assault, domestic violence, dating violence and stalking, and it clarifies the rights of victims. The regulations also include:

- Reporting campus crime statistics prohibited under the Clery Act, to now include incidents of domestic violence, dating violence, sexual assault and stalking, as well as crimes motivated by gender identity or national origin;
- Providing comprehensive educational prevention and awareness programs for incoming students and new employees. In addition to ongoing prevention and awareness campaigns for students, faculty and employees that identifies and defines sexual assault, rape, acquaintance rape, domestic violence, dating violence and stalking; and
- Conducting annual training for investigators and hearing officers who investigate and review reported offenses,

In addition, both Title IX and VAWA legislation permits The Tigi Hairdressing Academy, to assist both the victim and the accused with:

- An investigation
- Counseling and medical services
- Choosing a support person to accompany them throughout proceeding
- Allowing the victim and the accused to attend different classes

TITLE POLICY

Tigi Hairdressing Academy is committed to providing a work and educational environment free of unlawful harassment, discrimination and retaliation. In accordance with Title IX of the Education Amendments of 1972, the Academy does not discriminate on the basis of sex in its education programs or activities, which extends to admission and employment. The Academy also prohibits Sexual Harassment (as defined below) committed against persons in the United States as part of its education programs or activities.

If you believe that you have experienced or witnessed other incidents of sexual misconduct or discrimination, please follow the procedures outlined in the Academy's most updated Non-Discrimination and Policies.

The Academy reserves the right to make changes to this policy as necessary, and once those changes are posted online, they are in effect. If government laws, regulations or court decisions change requirements in a way that affects this policy, the policy will be construed to comply with 'the most recent government regulations or holdings.

Title IX Coordinators

THE TITLE IX COORDINATOR COORDINATES THE ACADEMY'S EFFORTS TO COMPLY WITH ITS TITLE IX RESPONSIBILITIES.

TIGI Hairdressing Academy Title IX Coordinator: Steven Chandler;
719.390.9898; stchandler@tighairdressingacademy.com

The Title IX Coordinator is responsible for implementing the Academy's Title IX policy, intaking reports and Formal Complaints of Sexual Harassment, providing supportive measures and maintaining accurate Clery Act crime statistics.

Any person can report sex discrimination, including Sexual Harassment (whether or not the person reporting is the alleged victim) in person, by mail, telephone, or e-mail, using the contact information listed above for the Title IX Coordinator. A report can be made at any time, including during non-business hours. However, responses to reports made outside of business hours, including during weekends and holidays, may be delayed.

Key Definitions

Sexual Harassment: Conduct on the basis of sex that satisfies one or more of the following

1. An employee of the Academy conditioning educational benefits or participation on an individual's participation in unwelcome sexual conduct (i.e. quid pro quo);
2. Unwelcome conduct that a reasonable person would determine is so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the Academy's education Program or Activity; or
3. Sexual Assault (as defined in the Clery Act), or Dating Violence, Domestic Violence or Stalking as defined in the Violence Against Women Act (VAWA) (collectively referred to as "Sexual Violence")

- Sexual Assault: As defined in 20 U.S.C. 1092(f)(6)(A)(v), means an offense classified as a forcible or nonforcible sex offense under the uniform crime reporting system or the Federal Bureau of Investigation.
 - Dating Violence: As defined in 34 U.S.C. 12291(a)(10), means violence committed by a person (A) who is or has been in a social relationship of a romantic or intimate nature with the victim; and (B) where the existence of such a relationship shall be determined based on a consideration of the following factors: the length of the relationship; the type of relationship; and, the frequency of interaction between the persons involved in the relationship.
 - Domestic Violence: As defined in 34 U.S.C. 12291(a)(8), includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim 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 the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.
 - Stalking: As defined in 34 U.S.C. 12291(a)(30), means engaging in a course of conduct directed at a specific person that would cause a reasonable person to: (A) fear for his or her safety or the safety of others; or (B) suffer substantial emotional distress.
 - Please note: In accordance with the Violence Against Women Reauthorization Act of 2013 ("VAWA"), state definitions for Sexual Assault, Dating Violence, Domestic Violence, Stalking and Consent are contained in the Academy 's Annual Campus Safety and Security Report ("ASR"). VAWA crime statistics are reported in the ASR based on the definitions above.

Complainant: An individual who is alleged to be the victim of conduct that could constitute Sexual Harassment, regardless of whether a Formal Complaint has been filed. A Complainant must be the alleged victim unless a parent or legal guardian has a legal right to act on the alleged victim's behalf.

Respondent: An individual who has been reported to be the perpetrator of conduct that could constitute Sexual Harassment.

Parties: include the Complainant(s) and Respondent(s) collectively.

Advisor: An individual chosen by a party to accompany the party to meetings related to the resolution process, to advise the party on that process and to conduct cross-examination (or the party at any hearing, if any). If a party does not have an Advisor at the hearing portion of the Grievance Process, the Academy will appoint an advisor.

Formal Complaint: A document (hardcopy or electronic) filed by a Complainant or signed by the Title IX Coordinator alleging Sexual Harassment against a Respondent and requesting that the Academy investigate. A Formal Complaint must be signed (physical or digital) by the Complainant, the Title IX Coordinator, or otherwise indicate that the Complainant is the person filing the Formal Complaint. At the time of filing a Formal Complaint, the Complainant must be participating in or attempting to participate in the Academy's education Program or Activity with which the Formal Complaint tiled.

Program or Activity: On or off campus locations, events, or circumstances over which the Academy exercises substantial control over both the Respondent and the context in which the Sexual Harassment occurred

Mandatory Reporter: Designated Academy employees who must share knowledge, notice and/or reports of Sexual Harassment, discrimination and/or retaliation with the Title IX Coordinator.

Supportive Measures

The Title IX Coordinator will provide Supportive Measures as necessary. Supportive Measures are individualized services reasonably available to ensure equal educational access, protect safety or deter prohibited conduct. Supportive Measures are available, as appropriate, to either or both the Complainant and Respondent and are non-punitive, non - disciplinary and not unreasonably burdensome to the other party. Examples include counseling, extensions of time or other course-related adjustments, modifications to work or class schedules, campus escort services, restrictions on contact between the Parties. leave of absence. increased security and monitoring of certain areas on campus, and other similar accommodation. The Supportive Measures needed by the Complainant and/or Respondent may change over time, and the Title IX Coordinator will communicate with each party to ensure that any Supportive Measures are necessary and effective based on evolving needs.

Victims of Sexual Violence will also be provided with written notification about existing counseling, health and/or mental health services, victim advocacy. legal assistance. visa and immigration assistance, safety planning, timely warnings. student financial aid and other services available to victims within the Academy and in the community.

Once the Title IX Coordinator receives a report, the Title IX Coordinator will promptly contact the Complainant confidentially to discuss the availability of Supportive Measures (available with or without filing a Formal Complaint) and explain the process for filing a Formal Complaint and provide a copy of this policy. The Title IX Coordinator will consider the Complainant's wishes with respect to Supportive Measures.

The Academy will keep confidential the identity of the victim of Sexual Violence and any accommodations or Supportive Measures provided, to the extent that maintaining such confidentiality will not impair the Academy's ability to provide the accommodations or Supportive Measures.

Dismissal of a Formal Complaint

Dismissal of a Formal Complaint may occur under several circumstances. The Academy must dismiss a Formal Complaint if the allegations do not meet the definition of Sexual Harassment, did not occur in the Academy's education Program or Activity, or did not occur against a person in the United States.

The Academy may dismiss a Formal Complaint if the Complainant informs the Title IX Coordinator. in writing, that he, she. or they withdraw the Formal Complaint or allegations therein; the Respondent is no longer enrolled or employed by the Academy; or if specific circumstances prevent the Academy from gathering sufficient evidence to reach a determination,

If a Formal Complaint is dismissed, the Parties will be provided written notice of the dismissal outlining the reason(s) for dismissal. A dismissal does not preclude action by the Academy under Student or Team Member conduct policies.

Grievance Process

The Academy utilizes a prompt, equitable and impartial Grievance Process to evaluate Formal Complaints. Title IX personnel (Title IX Coordinator, Investigators, Decision-Makers, individuals who facilitate Informal Resolution process) Will be free from conflicts of interest or bias for or against Contaminants or Respondents. Title IX personnel will objectively evaluate all relevant evidence and avoid credibility determinations based on a person's status as a Complainant, Respondent or witness,

Both Parties will receive equal opportunity to provide information, witness statements, evidence, and other information that may be necessary to fully evaluate the alleged offense. Both Parties will be afforded equitable rights and access.

Discretionary Reporter: Designated Academy employees who may, with the Complainant's consent, report instances to the Title IX Coordinator.

Clery Act: Meaning the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act (20 U.S.C. Section

10920; 34 C.F.R. Part 668.46). In accordance with the Clery Act, the Academy publishes required crime statistics and policy statements in its Annual Safety and Security Report (ASR) on or before October 1st of each year.

Clery Geography: As defined in the Clery Act, includes (A) buildings and property that are part of the Academy's campus; (B) the Academy's non campus buildings and property; and (C) public property within or immediately adjacent to and accessible from the campus.

VAWA: Meaning the Violence Against Women Reauthorization Act of 2013 (34 CFR Part 668).

Procedure for Reporting

If you believe that you have experienced or witnessed Sexual Harassment (including Sexual Violence), discrimination or retaliation, the Academy encourages you to notify the Title IX Coordinator as soon as possible after the incident. A report may be made to either or both the police and the Title IX Coordinator. The criminal process is separate from the Academy's Title IX Grievance Process.

A report of Sexual Violence may be made to either or both the police and the Title IX Coordinator. The criminal process is separate from the Academy's process. It is the Academy's policy not to notify local law enforcement when Sexual Violence occurs, unless a Complainant wishes or there is an emergency threat to health or safety. Complainants have the option to notify law enforcement directly or be assisted in doing so. If requested, the Academy will assist a victim of Sexual Violence in contacting the police. A Complainant is not required to contact the police in order to pursue the Academy's grievance process.

The Academy does not issue orders of protection. Orders of protection, restraining orders, injunctions or similar lawful orders may be obtained through the court system and can be enforced by the Academy. Individuals who have obtained an order of protection is encouraged to provide a copy to the Title IX Coordinator as soon as possible. Although the Academy does not issue orders of protection, information on how to obtain a protective order is located in the ASR.

Confidentiality

In order to make informed choices, it is important to be aware of confidentiality and reporting requirements when consulting Academy resources. Any Team Member may report to the Title IX Coordinator. Education Team and Team Leads must report to the Title IX Coordinators and are

considered mandatory reporters. Academy employees designated mandatory reporters will notify the Title IX Coordinator of any complaints received.

An individual who seeks completely confidential assistance may do so by speaking with professionals who have legally protected confidentiality. The Academy does not have confidential reporting resources, such as pastoral or professional counselors on campus. Crisis, mental health and victim resource hotline information is available at the conclusion of this policy. Information shared with confidential resources will not be shared with the Institute (including the Title IX Coordinator) or anyone else without express, written permission of the individual seeking services unless required by law or court order.

The Academy will keep confidential the identity of the Complainant, Respondent, and witnesses, except as may be permitted by FERPA, as required by law, or as necessary to carry out the Title IX Grievance Process.

There is no time limitation on providing notice/complaints to the Title IX Coordinator. However, if the Respondent is no longer subject to the Academy's jurisdiction and/or significant time has passed, the ability to investigate, respond, and provide remedies may be more limited or impossible, acting on notice/complaints significantly impacted by the passage of time (including, but not limited to, the rescission or revision of policy) is at the discretion of the Title IX Coordinator, who may document allegations for future reference, offer supportive measures and/or remedies, and/or engage in informal or formal action, as appropriate.

