

## **Cameo Beauty Academy**

### **TITLE IX, JEANNE CLERY AND ANNUAL SECURITY REPORT – OVERVIEW & DISSEMINATION**

#### **CAMPUS SECURITY/DRUG AND ALCOHOL ABUSE PREVENTION Campus Security**

To maintain compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (“Clery Act”) and related Higher Education Act (“HEA”) requirements, and in an effort to continuously promote and improve safety and security measures on campus, the School collects, maintains, and disseminates information regarding its current safety and security policies, victim services and crime statistics. Once collected, the information is presented annually in its Annual Security Report (“ASR”) to prospective and current students, faculty and staff and the public. Upon request, the School will provide a paper copy of its ASR. Please contact the Campus Director, Kathleen Bennicoff, 9714 S. Cicero Ave., Oak Lawn, 708-636-4660, [kathyb@cameobeautyacademy.com](mailto:kathyb@cameobeautyacademy.com) to request a paper copy of the ASR or if you have any questions about the ASR.

#### **Drug and Alcohol Prevention**

The School is committed to the well-being of its students and employees. Thus, the School maintains alcohol and drug abuse policies and programs consistent with the Drug-Free Schools and Communities Act (DFSCA). Related to such policies and programs are internal implementation plans and procedures for ensuring effectiveness and to ensure consistency in enforcement, for both students and employees. In January, on a biennial basis, the School will review its compliance with the DFSCA and necessary updates or changes to the policy or program will be made. A notification will be sent to students and staff if any changes or updates are made.

The School strictly forbids the possession, distribution, use, or sale of alcoholic beverages and/or illegal drugs by students and employees on the School’s property or as part of School activities. Medical marijuana or state-legalized recreational marijuana is federally illegal and is included and covered by this policy. Students and staff members should report any knowledge of such activities to the appropriate School personnel. Any infraction is cause for immediate suspension and possible termination. When appropriate, such infractions will also be reported to the local authorities. The School reserves the right to require drug testing based on reasonable suspicion.

#### **Financial Aid and Penalties for Drug Violators**

The following notice provides information about the Title IV federal financial aid penalties associated with drug-related offenses under section 484(r) of the Higher Education Act. It also describes how to regain eligibility for such financial aid after conviction of a drug-related offense.

As prescribed in Section 484(r), a student convicted of any offense under any federal or state law involving the possession or sale of a controlled substance during a period of enrollment when he or she was receiving any grant, loan, or work assistance under Title IV will be ineligible to receive such assistance for the following period of time:

- For one year from the date of conviction for the first offense involving the possession of a controlled substance.
- For two years from the date of conviction for the second offense involving the possession of a controlled substance.
- Indefinitely from the date of conviction for the third offense involving the possession of a controlled substance.
- For two years from the date of conviction for the first offense involving the sale of a controlled substance.
- Indefinitely from the date of conviction for the second offense involving the sale of a controlled substance.

A student whose eligibility has been suspended under the previous provision may resume eligibility before the end of the prescribed ineligibility period by one of the following means:

- The student satisfactorily completes a drug rehabilitation program that complies with criteria the secretary of education prescribes and includes two unannounced drug tests.
- The conviction is reversed, set aside, or otherwise rendered nugatory.

### **Overview of Health Risks with the Use & Abuse of Drugs and Alcohol**

The use and abuse of alcohol and/or drugs can lead to physical and psychological health risks. These risks depend upon the type of alcohol/drug used and the intensity of the use. Long-term use of alcohol/drugs can lead to organic damage to the body and psychological problems. Even short-term use carries a risk of an overdose that can result in effects as serious as death. Alcohol/drug use also carries other direct and indirect health risks, including a heightened risk of blood-transmitted disease for users of intravenous drugs, the risk of pregnancy complications and birth defects in women who use alcohol/drugs while pregnant, and the impairment of the ability to operate motor vehicles.

While not comprehensive, some of the health risks associated with the use or abuse of specific substances are provided below:

- **Alcohol:** May provide a feeling of confidence and being in control. Those likely to be addicted may have an enzyme deficiency that allows them a high rate of consumption without drunkenness, encouraging a belief that since one doesn't get obviously drunk, no harm is done. The tolerance is only on the surface. Liver, brain, heart, and stomach destruction goes on even without apparent symptoms. Over time, beer, wine, and hard alcohol often cause dependency and may be fatal.

- **Marijuana:** Use of marijuana may impair or reduce short-term memory and comprehension, alter sense of time, and reduce ability to perform tasks requiring concentration and coordination, such as driving a car. Research shows that knowledge retention may be lower when information is given while the person is “high.” Motivation and cognition are altered, making the acquisition of new information difficult. Marijuana can also produce paranoia and psychosis. The tar in marijuana smoke is a highly irritating carcinogenic. Long-term use may develop psychological dependence.

- **Cocaine:** Chronic use can cause ulceration of the mucous membrane in the nose. Cocaine can produce psychological dependency, a feeling that the user cannot function without the drug. Crack or free-base rock, a concentrated form of cocaine, is extremely potent. Its effects are felt within ten seconds of administration. Physical effects include dilated pupils, increased pulse rate, elevated blood pressure, and insomnia, loss of appetite, tactile hallucinations, paranoia, and seizures. Cocaine use may lead to death through disruption of the brain’s control of heart and respiration.

- **Amphetamines & Other Stimulants:** Stimulants can cause increased heart and respiratory rates, elevated blood pressure, dilated pupils, and decreased appetite. In addition, users may perspire, experience headache, blurred vision, dizziness, sleeplessness, and anxiety. Extremely high doses can cause rapid or irregular heartbeat, tremors, loss of coordination, and even physical collapse. An amphetamine injection creates a sudden increased in blood pressure that can result in stroke, very high fever, or heart failure. In addition to the physical effects, users report feeling restless, anxious, and moody. Higher doses intensify the effects. Persons who use large amounts of amphetamines over a long period of time can develop an amphetamine psychosis that includes hallucination, delusions, and paranoia.

- **Narcotics (e.g., heroin, methadone, morphine, prescription opiates):** Tolerance to narcotics develops rapidly and dependence is likely. The use of unsterilized syringes may result in transmission of diseases such as AIDS, endocarditis, and hepatitis. Addiction in pregnant women can lead to premature, stillborn, or addicted infants. An overdose may produce slow and shallow breathing, clammy skin, convulsions, coma, and death.

- **Depressants:** The use of depressants can cause both physical and psychological dependence. Regular use over time may result in tolerance to the drug, leading the user to increase the quantity consumed. Very large doses can cause respiratory depression, coma, and death. The combination of depressants and alcohol can increase the effects of the drugs, thereby multiplying the risks. When regular users stop taking depressant drugs, they may develop withdrawal symptoms ranging from restlessness, insomnia, and anxiety to convulsions and death. Babies born to mothers who abuse depressants during pregnancy may be physically dependent on the drugs and show withdrawal symptoms shortly after they are born. Birth defects and behavioral problems have been associated with these children.

- **Hallucinogens:** Chronic users of PCP report persistent memory problems and speech difficulties. Mood disorders (depression, anxiety, and violent behavior) also occur. In later stages, chronic users often exhibit paranoid and violent behavior and experience hallucinations. Large doses of PCP may produce convulsions, coma, heart and lung failure, or ruptured blood vessels in the brain. Lysergic acid (LSD), mescaline,

and psilocybin cause illusions and hallucinations. The physical effects may include dizziness, weakness, tremor, nausea, and drowsiness. Sensations and feelings may change rapidly. It is common to have a bad psychological reaction to LSD, mescaline, and psilocybin. The user may experience panic, confusion, suspicion, anxiety, and loss of control. Delayed effects, or flashbacks, can occur even after the use has ceased.

- **Designer Drugs:** Underground chemists modify the molecular structure of certain illegal drugs to produce analogs known as designer drugs. These drugs can be hundreds of times stronger than the drugs that they are designed to imitate. The narcotic analogs can cause symptoms such as those seen in Parkinson's disease; uncontrollable tremors, drooling, impaired speech, paralysis, and irreversible brain damage. Analogs of amphetamines and methamphetamines cause nausea, blurred vision, chills or perspiration, and faintness. Psychological effects include anxiety, depression, and paranoia. As little as one dose can cause brain damage. The analogs of phencyclidine cause illusions, hallucinations, and impaired perception.

### **Information Regarding Available Drug and Alcohol Programs**

Cameo Beauty Academy does not directly offer any professional counseling, treatment or rehabilitation programs for students or associates that have issues related to drugs and/or alcohol. However, Cameo Beauty Academy understands and appreciates that professional assistance is typically required to successfully address these issues.

Any student who suspects that he or she, or someone else, may be at risk due to use or abuse of alcohol or illicit drugs is encouraged to seek services that can be of help. Although there are many local assistance programs available, those in need of help can access these resources via the Internet, or can call the appropriate toll-free number provided below:

- Alcoholics Anonymous 1-800-356-9996
- American Council on Alcoholism 1-800-527-5344
- Cocaine Hotline 1-800-COCAINE
- National Council on Alcoholism 1-800-NCA-CALL
- National Institute on Drug Abuse 1-800-662-HELP
- National Suicide Prevention Hotline 1-800-273-8255

## **REVIEW OF EFFECTIVENESS OF DAAPP**

In the last three year Cameo Beauty Academy has not had any incidents of drug or alcohol abuse on campus.

## **CAMPUS SECURITY INFORMATION, POLICIES AND PROCEDURES**

Cameo Beauty Academy seeks to ensure that students, associates and other visitors are safe on the grounds of Cameo Beauty Academy. With this objective, and following the requirements as outlined in the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act, Cameo Beauty Academy has developed a set of policies and procedures that cover a range of safety and security matters, as outlined below.

### **General Security Information**

From a campus & facility perspective, the following general security information applies:

- Cameo Beauty Academy is not responsible for lost or stolen items.
- Cameo Beauty Academy does not staff dedicated security or police personnel.
- There is safety in numbers. No one should walk alone where it is dark.
- Cars should be locked at all times when someone is not in them.
- The campus is locked and secured after hours and alarms are activated with security alarms.
- The security cameras record 24/7.
- All campus rooms have the nearest exits posted by the door.
- Students are provided a locker to secure their property.
- Associates are provided a locker to secure their property.

### **Crime Prevention Program**

Cameo Beauty Academy requests that students and associates follow the following general security guidelines, which we believe will help prevent crimes:

- Be responsible for your own security and the security of others.
- Report criminal actions or other emergencies occurring on campus to the Campus Director
- Do not leave valuables visible in your car and always lock your car.
- Do not keep personal or valuable items in bags (backpacks, purses, kit bags) that will not be secure.
- Leave credit cards and personal banking information at home.
- Use your locker—do not leave personal property unattended in unsecured locations.
- Keep your campus locker locked; and do not give anyone except Campus Management your locker combination.
- Be aware of others around you both inside and around Cameo Beauty Academy property: if you are uncomfortable with your surroundings, seek assistance and request an escort.
- Know where the exits are in case of an evacuation.

- When working late, keep all back and side doors locked.
- If you think a situation is dangerous, it most likely is; immediately seek assistance.

In addition to students and associates being informed of this program each year through the Annual Security Report, the program will also be reviewed with new students during orientation.

### **Harassment & Bullying Policy**

Cameo Beauty Academy is an environment that is free from intimidation or harassment. Harassment of associates and/or students by any associate, student, guest, or outside vendor is prohibited and may result in disciplinary action, up to and including termination from Cameo Beauty Academy. Harassment is defined as behavior that is offensive to an individual or group, including unwelcome sexual advances, uninvited suggestive remarks, verbal, written or graphic communication that is sexist, racist, contains religious slurs, or ethnic jokes, etc. If you observe this type of behavior, you should immediately address the issue by advising the individual that it is unwelcome, unwanted and inappropriate. If the behavior does not cease, report it to a member of the campus management team immediately.

Verbal and/or written threats to any individual(s) will be taken seriously, perceived as credible and turned over to the local police for investigation. It is not the responsibility of Cameo Beauty Academy to evaluate the validity of a perceived threat. We view this as a serious matter and will not tolerate any threats, joking or not, regarding the safety of our associates and/or students.

"Bullying" often refers to verbal, physical, or other acts committed by a person to harass, intimidate, or cause harm to another person. The behaviors attributed to bullying may include verbal threats, menacing, harassment, intimidation, assaults and disruption of the institution environment, associated disorderly conduct, and related behaviors. Should a student or associate feel that any of these situations apply, and could not be (or could not comfortably attempt to be) resolved directly, he/she is directed to immediately seek the help Campus Management. At the minimum, all cases of student bullying will be turned over to the campus management team for investigation.

### **Title IX Coordinator:**

Cameo Beauty Academy's Title IX Coordinator - Campus Director, Kathleen Bennicoff, [kathyb@cameobeautyacademy.com](mailto:kathyb@cameobeautyacademy.com), school phone -708-636-4660, cell phone – 412-780-7252 is to comply with and carry out the responsibilities of Cameo Beauty Academy under Title IX of the Education Amendments of 1972, which prohibits sex discrimination in the education programs and activities. The remainder of the Sexual Misconduct policy will refer to the Title IX Coordinator and her responsibilities to support the employees and students of Cameo Beauty Academy.

Any inquiries regarding Title IX should be addressed with the Title IX Coordinator.

If an alleged case of sexual misconduct is brought to the attention of a Title IX Coordinator via a victim, third party or responsible employee, the Title IX Coordinator will take immediate and effective measures to address and investigate the alleged incident of sexual misconduct. The Title IX Coordinator will assist in preventing a potential hostile environment, which interferes with students' ability to benefit from the education offered at Cameo Beauty Academy. Whether a harassed student or employee, parent of a student or a third party files a complaint under the Cameo Beauty Academy's grievance procedures or requests action on the student or employee's behalf, the Title IX Coordinator must immediately investigate what occurred and then take appropriate steps to resolve the issue.

The Title IX Coordinator is responsible for overseeing Cameo Beauty Academy response to Title IX reporting and complaints. The Title IX Coordinator will also address any patterns or systemic problems which are revealed through complaints or reports on incidents. The Title IX Coordinator is responsible for initiating, coordinating and documenting actions taken during Title IX investigations against the perpetrator and support for the victim.

### **Sexual Misconduct Prevention, Interpersonal Violence and Response Policy Introduction:**

Cameo Beauty Academy fully supports the objectives of the Federal Campus Sex Crimes Prevention Act and the Violence Against Women Act (VAWA). These Acts require Cameo Beauty Academy to follow compliance requirements and establish protections for victims of sexual discrimination, including: sexual harassment and/or assault (non-consensual sexual contact and non-consensual sexual intercourse), domestic or dating violence, sexual exploitation, intimidation, retaliation and stalking, each of which are described below in the definitions section of this policy. By policy, these and related actions are expressly prohibited by Cameo Beauty Academy. As part of this policy, Cameo Beauty Academy is committed to prevent such offenses from occurring and take appropriate steps to address any violations of sexual misconduct that occur within Cameo Beauty Academy's jurisdiction. Cameo Beauty Academy is committed to ensuring all students and employees feel safe in their learning and work environment so they have the opportunity to benefit fully from their Cameo Beauty Academy experience.

### **Non-Discrimination**

Cameo Beauty Academy does not discriminate on the basis of age, sex, ethnic origin, race, color, disability or religion, or any other classification protected by federal, state or local law, in its educational programs, admissions, instruction, graduation policies or in any other way. This practice of non-discrimination also extends to employment by the school.

The School does not allow or tolerate discrimination of any kind including harassment or bullying. If you believe you have experienced or witnessed

discrimination (including bullying or harassment), immediately report the incident to Campus Director, Kathleen Bennicoff, 9714 S. Cicero Ave., Oak Lawn, school phone - 708-636-4660, cell phone – 412-780-7252, kathyb@cameobeautyacademy.com, so appropriate action can be taken. Individuals will not be retaliated against for bringing a complaint.

Student concerns or complaints related to sexual harassment and/or sexual violence should be reported to the Title IX Coordinator - Campus Director, Kathleen Bennicoff and handled in compliance with the Title IX policy and procedure.

### **Scope**

Cameo Beauty Academy's Sexual Misconduct Policy's scope applies to all acts of sexual misconduct and their adjacent public properties, defined per the Clery Act. It covers all Cameo Beauty Academy education programs and Cameo Beauty Academy sponsored activities, including field trips. Even if the violation did not occur within a Cameo Beauty Academy related activity or elsewhere but the alleged perpetrator(s) also is a member of the Cameo Beauty Academy community, Cameo Beauty Academy will process all violations and complaints in order to pay consideration to whether the incident has created a hostile educational environment within Cameo Beauty Academy. This policy applies to all Cameo Beauty Academy employees and students in all program offerings, regardless of each individual's sexual orientation or gender identity. This policy also pertains to third parties who witness or are informed of an alleged sexual misconduct violation. Instances of sexual misconduct are included in the school's rep

### **Definitions**

**Sexual harassment** is defined as unwelcome advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, when submission to or rejection of this conduct explicitly or implicitly affects a person's employment or education, unreasonably interferes with a person's work or educational performance, or creates an intimidating, hostile or offensive working or learning environment.

Consent is defined as words or voluntary agreement to engage in sexual activity.

- Consent cannot be given by someone who is incapacitated in any way.
- Past consent does not imply future consent.
- Absence of resistance or silence does not imply consent.
- Consent to engage in sexual activity with one person does not imply consent to engage in sexual activity with another person.
- Consent can be withdrawn at any time for any reason.
- Coercion, force or threat of by either party invalidates consent.

In addition, Sexual harassment means conduct on the basis of sex that satisfies one or more of the following:

1. An employee of the recipient conditioning the provision of an aid, benefit, or service of the recipient on an individual's participation in unwelcome sexual conduct (often called "quid pro quo" harassment);
2. Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal



access to the school's education program or activity.

**Incapacitation** is defined as the physical and/or mental inability to make informed, rational judgments. When alcohol is involved, incapacitation is determined by how the alcohol consumed impacts a person, including the person's decision making capacity, awareness of consequences and ability to make informed judgments. Incapacitation may also be observed when a person is asleep or unconscious, or because of an intellectual or other disability that prevents the person from having the capacity to give consent.

**Sexual assault** is defined as an offense classified as a forcible or non-forcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation including rape, fondling, incest, or statutory rape. In this and similar contexts, consent is defined as a voluntary, positive agreement between the participants to engage in specific sexual activity. Lack of verbal or physical resistance or submission by the victim resulting from the use of force or threat of force by the accused shall not constitute consent.

- **Non-Consensual Sexual Contact:** Any intentional touching of the intimate parts of another person, causing another to touch one's intimate parts, removing clothing or exposure of another without consent. Sexual contact also includes attempted sexual intercourse
- **Non-Consensual Sexual Intercourse:** Any act of sexual intercourse with another individual without consent. Sexual intercourse includes vaginal or anal penetration, however slight, with any body part or object, or oral penetration involving mouth-to-genital contact.

**Domestic Violence** is defined as a felony or misdemeanor crime 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 living with or has lived with the victim as a spouse or partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which this policy applies, or by any other person against an adult or youth victim who is protected under the domestic or family violence laws of the jurisdiction in which this policy applies. Domestic violence can be physical, sexual, emotional, economic, or psychological actions or threats of actions that influence another person. This includes any behaviors that intimidate, manipulate, humiliate, isolate, frighten, terrorize, coerce, threaten, blame, hurt, injure, or wound someone.

**Dating Violence** is defined as violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and when the existence of such a relationship shall be determined based on the following factors: the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship.

**Sexual Exploitation** is defined as one person taking sexual advantage of another person for the benefit of any other than that person without that person's consent.

Examples include:

- Prostituting another person;
- Recording images (video, photograph) or audio of another person's sexual activity, intimate body parts, nakedness without that person's consent;
- Distributing images (video, photograph) or audio of another person's sexual activity, intimate body parts or nakedness, if the individual distributing the images or audio knows or should have known the person depicted did not consent to the disclosure of such activity;
- Viewing another person's sexual activity, intimate body parts or nakedness in a place where that person would have reasonable expectation of privacy, without that person's consent and for the purpose of arousing sexual desire.

**Stalking** is defined as a pattern of repeated and unwanted attention, harassment, contact, or any other course of conduct directed at a specific person that would cause a reasonable person to fear for his or her safety or the safety of others or to suffer substantial emotional distress.

**Retaliation** is defined as intimidating, threatening, coercing, or in any way discriminating against an individual because of the individual's informal or formal complaint or participation in a school or the U.S. Department of Education, Office for Civil Rights (OCR) investigation or proceedings related to sexual violence or other civil rights concerns. Federal civil rights laws, including Title IX, make it unlawful to retaliate against an individual for the purpose of interfering with any right or privilege secured by these laws.

**Confidentiality:**

Cameo Beauty Academy urges victims to seek help and support if they are a victim of sexual misconduct in anyway. Although Cameo Beauty Academy does not offer professional or pastoral counseling services it will offer support as needed to refer a victim to an appropriate source of help.

Cameo Beauty Academy confidentiality policy pertains to maintaining and properly addressing each individual report of sexual misconduct. Cameo Beauty Academy encourages any employee or student to talk to someone about what happened in order to obtain appropriate support. A victim may report the offense to a "responsible employee" who, at the campus level, could be an educator, part of campus staff or the Campus Director. Before a victim shares any information with a responsible employee, the victim should be made aware the responsible employee has an obligation to report the incident to the Title IX Coordinator.

If the victim would like to remain confidential or requests the incident not be investigated the victim shall be of the understanding that the Cameo Beauty Academy must evaluate if the incident compromises its ability to provide a safe, non-discriminatory environment for all employees and students which includes the victim of the incident. Should a student seek out the support of a responsible employee,

the responsible employee is obligated to report to the Title IX Coordinator all important details about the alleged incident shared by the victim and the Title IX Coordinator will gather all facts in order to take immediate and appropriate steps to investigate what happened and support a fair and prompt resolution.

Please note, if Cameo Beauty Academy determines that an alleged perpetrator(s) poses an immediate threat to the Cameo Beauty Academy environment, the Title IX Coordinator may be required to issue a notice of timely warning to the campus employees and students. Cameo Beauty Academy will not include any information that identifies the victim of the incident in its warning.

Cameo Beauty Academy will obtain consent and inform the victim (or the victim's parents or legal guardians if the victim is under 18) prior to beginning an investigation of sexual misconduct of any kind. If the victim requests confidentiality or requests the investigation not be pursued, Cameo Beauty Academy will take all reasonable steps to maintain the confidentiality request or request to not pursue the investigation. If a victim requests that his or her name or any other personally identifiable information not be disclosed to the alleged perpetrator, Cameo Beauty Academy will inform the victim that its ability to respond to the instance of reported sexual misconduct may be limited. Even if the institution can't take disciplinary action against the alleged perpetrator because the victim insists on confidentiality, it will pursue other steps in order to limit effects of the alleged incident of sexual misconduct and prevent any reoccurrence. If Cameo Beauty Academy cannot ensure confidentiality, Cameo Beauty Academy will inform the victim. Cameo Beauty Academy prohibits retaliation in all instances of reported sexual misconduct, and will take steps to prevent retaliation as well as strong responsive action if any form of retaliation occurs.

#### **Options for Assistance:**

If any individual (student or employee) is a victim of any type of sexual misconduct, his or her first priority should be to locate a place of safety and obtain any necessary medical treatment. Cameo Beauty Academy strongly advocates that a victim of these offenses report the incident and seek immediate assistance. Time is a critical factor for evidence collection and preservation for the proof of a criminal offense. An assault should be reported directly to local authorities at the non-emergency number, listed below. In an emergency, dial 911. The Title IX Coordinator should also be notified (even if made aware by Cameo Beauty Academy responsible employee). Upon request, the Title IX Coordinator will assist victims in reporting incidents of these offenses to local police, and will work to protect the confidentiality of the victims(s), as desired. Filing a police report will not obligate the victim to prosecute, nor will it subject the victim to scrutiny or judgmental opinions from officers.

For a link of professional resources in a specific zip code, as well as a list of professional agencies, please use: <https://findahealthcenter.hrsa.gov/>

Cameo Beauty Academy does not offer professional or pastoral counseling, but strongly encourages any victim to utilize the many resources that are available,

including:

- National Sexual Assault Hotline: 1-800-656-4673
- Rape, Abuse, Incest National Network: <http://www.rainn.org/>
- National Domestic Violence Hotline: 1-800-799-7233
- Center for Changing our Campus Culture: [changingourcampus.org](http://changingourcampus.org)

Per the Student Right to Know Act, schools must notify their students as to where they may obtain information regarding registered sex offenders in their area. Accordingly, students (and associates) are encouraged to utilize the following links that lead to private, federal and state resources on the topic:

- U.S. Department of Justice: <http://www.nsopw.gov/Core/Portal.aspx>

Cameo Beauty Academy believes the best method to address the above offenses is to prevent them from happening in the first place. Prevention requires all individuals to be educated, aware and diligent. To assist in this prevention effort, Cameo Beauty Academy does the following:

- Educate new students (during new student orientation) and new staff (during hiring process) about these offenses, including what they are and what to do if they have been victimized or have seen or heard about someone else being victimized.
- Provide ongoing awareness of these offenses to existing students and associates via an annual distribution of the Annual Security Report, with an emphasis on the topic of the offenses and related programs outlined herein.

As with other forms of harassment, individuals who believe they are victims of sexual harassment should make it clear to the source(s) of the harassment that such behavior is offensive to them. If the behavior continues, document the matter and refer it to a responsible associate.

### **Protocol to Report a Grievance**

Should an employee, student, third party or parent/guardian (if the student is under 18 years of age) need to report a violation of sexual misconduct, he/she should file the grievance with the Title IX Coordinator – Campus - Kathleen Bennicoff. Typically the report is initiated by the victim who feels their rights under this policy have been violated. The grievance can also be filed with a responsible employee as described above, and the responsible employee will relay to the Title IX Coordinator. Cameo Beauty Academy will accept anonymous reports of violations, and the individual reporting the incident is encouraged to provide as much detail as possible to allow Cameo Beauty Academy to investigate the situation and respond appropriately. In cases of anonymous reporting, Cameo Beauty Academy may be limited in its ability to investigate the violation unless sufficient information is provided to enable the institution to conduct a complete and fair investigation or take the appropriate actions. The Title IX Coordinator will ask the victim to confirm their report in writing and sign a complaint form. Complaint forms are available from the Title IX Coordinator. Once a grievance is reported, the Title IX Coordinator will request

consent to proceed with investigation of the grievance from the victim. Should the victim request the grievance remain confidential or not to be investigated, the Title IX Coordinator will need to evaluate the grievance and determine if the request can be honored.

## **School's Response**

Through the remainder of the School's Response document, Cameo Beauty Academy will be referred to as "The School."

### **Definitions:**

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In addition, Sexual harassment means conduct on the basis of sex that satisfies one or more of the following:

- 1 An employee of the recipient conditioning the provision of an aid, benefit, or service of the recipient on an individual's participation in unwelcome sexual conduct (often called "quid pro quo" harassment);
- 2 Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the school's education program or activity.

**Complainant:** An individual who is alleged to be the victim of conduct that could constitute sexual harassment

**Respondent:** An individual who has been reported to be the perpetrator of conduct that could constitute sexual harassment.

**Formal Complaint:** a document filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that the recipient investigate the allegations of

**Actual Knowledge:** means notice of sexual harassment or allegations of sexual harassment to a recipient's Title IX Coordinator or any official of the recipient who has authority to institute corrective measures on behalf of the recipient, or to any employee.

- The ability or obligation to report sexual harassment or to inform a student about how to report sexual harassment, or having been trained to do so, does not qualify an individual as one who has authority to institute corrective measures on behalf of the recipient.

## **School's Response**

- The school must respond when:
  - The school has actual knowledge of sexual harassment
  - The sexual harassment occurred within the school's education program or activity and the sexual harassment is against a person in the United States (no study abroad programs)
- The school violates Title IX when its response to sexual harassment is clearly unreasonable in reference to the known circumstances. This action is referred to as, deliberate indifference.
- The school's Title IX Coordinator must immediately and confidentially contact the complainant to discuss the availability of supportive measures, consider the complainant's wishes with respect to supportive measures, inform the complainant of the availability of supportive measures with or without the filing of a formal complaint, and explain to the complainant the process for filing a formal complaint.
- The school must investigate every formal complaint, whether presented by a complainant or the school's Title IX Coordinator. If the alleged conduct does not fall under Title IX, then a school may address the allegations under the school's own code of conduct and provide supportive measures.

## **Fair Grievance Process**

- All complainants and respondents are to be treated equitably and all relevant evidence will be treated objectively.
- The school will require that all persons designated to facilitate an informal or formal resolution process be free of any conflict of interest or bias.
- Training of Title IX personnel must include preparation instruction on the definition of sexual harassment, the scope of the school's education program or activity, how to conduct an investigation and grievance process including hearings, appeals, and informal resolution processes, as applicable, and how to serve impartially, including by avoiding prejudgment of the facts at issue, conflicts of interest, and bias. Training materials must be posted on school's website.
- A school's decision-makers and investigators must receive training on issues of relevance, including how to apply the rape shield protections provided only for complainants.
- The school will presume that respondent is not responsible for the alleged conduct until a determination regarding responsibility is made at the conclusion of the grievance process.
- The school will provide realistic time frames for conclusion of the grievance process, including appeals and informal resolutions, with options for appropriate short-term, delays or extensions.
- The school will describe the range of possible remedies and disciplinary sanctions following determination of responsibility. The remedies must be designed to maintain the complainant's equal access to education and may include supportive measures; however, remedies need not be non-disciplinary or non-punitive and need not avoid burdening the respondent.

- The clear and convincing evidence standard will be used for all formal complaints of sexual harassment (including where employees and faculty are respondents).
- The school will identify the appeal procedures, and the range of supportive measures available to complainants and respondents.

### **Investigations**

- The burden of proof and the burden of gathering evidence must remain on the school, not on the parties.
- Both parties will have an equal opportunity to present witnesses, both fact and expert witnesses, and other inculpatory and exculpatory evidence.
- The school cannot restrict the ability of the parties to discuss the allegations or gather relevant evidence.
- The school will provide both parties the same opportunity to select others or an advisor of the party's choice who may be, but does not need to be, an attorney to present on the behalf of the party during any grievance proceeding.
- The school will send both parties written notice of any investigative interviews, meetings, or hearings.
- Both parties will receive an investigative report that justly summarizes the relevant evidence directly related to the allegations, in electronic format or hard copy, with at least 10 days for the parties to inspect, review, and respond to the evidence.
- The school will protect privacy of a party's medical, psychological, and similar treatment records and cannot access or use such records unless the school obtains the party's voluntary, written consent to do so.

### **Dismissal of a Formal Complaint**

- The school may dismiss a formal complaint where the conduct does not meet the definition of sexual harassment or did not occur in a school's education program or activity against a person in the U.S. Such dismissal is only for Title IX purposes and does not prevent the school from addressing the conduct in an appropriate manner.
- The school may dismiss a formal complaint or allegations if the complainant informs the Title IX Coordinator in writing that the complainant desires to withdraw the formal complaint.
- The complaint will also be dismissed if the respondent is no longer enrolled or employed by the school, or if the school is prevented from gathering sufficient evidence to reach a determination.
- The school will provide the parties written notice of a dismissal and the reasons for the dismissal.
- The school may, consolidate formal complaints where the allegations arise out of the same facts.

### **Hearings**

- The school will permit each party's advisor to ask the other party and any witnesses all relevant questions and follow-up questions, including those challenging credibility
- The questioning must be conducted directly, orally, and in real time by the party's advisor of choice and never by a party personally.
- Live hearings may be conducted with all parties physically present in the same location or, at the request of recipient, any or all parties, witnesses, and other participants may appear at the live hearing virtually, enabling the parties to see and hear each other simultaneously.
- Before a complainant, respondent, or witness answers a cross-examination or other question, the decision-maker must first determine whether the question is relevant and explain to the party's advisor asking cross-examination questions any decision to exclude a question as not relevant.
- If a party does not have an advisor present at the live hearing, the school must provide, without fee or charge to that party, an advisor of the school's choice who may be, but is not required to be, an attorney to conduct cross-examination on behalf of that party.
- If a party or witness does not submit to cross-examination at the live hearing, the decision-maker(s) must not rely on any statement of that party or witness in reaching a determination regarding responsibility; provided, however, that the decision-maker(s) cannot draw an inference about the determination regarding responsibility based solely on a party's or witness's absence from the live hearing or refusal to answer cross-examination or other questions.
- Schools must create an audio or audiovisual recording, or transcript, of any live hearing.

### **Informal Resolution**

- At any time before reaching a decision regarding responsibility, the recipient may facilitate an informal resolution process, such as mediation. This process would not involve a full investigation and decision. This method may be provided if:
  - Both parties voluntarily provide written consent to the informal resolution process;
  - Notifies both parties that at any time during the resolution process, any party has the right to withdraw from the informal resolution and resume or pursue the grievance process with a formal complaint;
  - The school does not offer or facilitate an informal resolution process to resolve allegations that an employee sexually harassed a student.
  - The school provides both parties written notice disclosing the allegations and the process and requirements of the informal resolution
- The school cannot require as a condition of enrollment or continuing enrollment, or employment or continuing employment, or enjoyment of any other right, waiver of the right to a formal investigation and adjudication of formal complaints of sexual harassment.
- A school may not require the parties to participate in an informal resolution process and may not offer an informal resolution process unless a formal complaint is filed.



## **Retaliation Prohibited**

- Intimidating, threatening, coercing or discriminating against any individual for the sole purpose of intruding with their right or privilege of Title IX constitutes retaliation. Retaliation also includes interfering with an individual because he or she has made a report or complaint, testified, assisted, or participated or refused to participate in any manner with the Title IX investigation.
- Charging an individual with code of conduct violations that do not involve sexual harassment, but arise out of the same facts or circumstances as a report or formal complaint of sexual harassment, for the purpose of interfering with any right or privilege secured by Title IX constitutes retaliation.
- The school must keep confidential the identity of complainants, respondents, and witnesses, except as may be permitted by FERPA, as required by law, or as necessary to carry out a Title IX proceeding.
- Complaints alleging retaliation may be filed according to a school's prompt and equitable grievance procedures.
- The exercise of rights protected under the First Amendment does not constitute retaliation.
- Charging an individual with a code of conduct violation for making a materially false statement in bad faith in the course of a Title IX grievance proceeding does not establish retaliation; however, a determination regarding responsibility, alone, is not sufficient to determine that any party made a materially false statement in bad faith.

## **Appeals Process**

- The school must offer both parties an appeal from the outcome regarding the responsibility, and from a recipient's dismissal of a formal complaint or any allegations on the following basis:
  - Procedural irregularity that affected the outcome of the matter;
  - New evidence that was not reasonably available at the time of the determination regarding the responsibility or dismissal was made, that could affect the outcome of the situation; and
  - The Title IX Coordinator, investigator(s), or decision-maker(s) had a conflict of interest or bias that affected the outcome

## **Weapons Policy**

Other than in the possession of official on-duty officer of the law, prohibited and/or dangerous weapons are not permitted on Cameo Beauty School campus. A permit to carry a firearm or concealed weapon does not supersede this policy. Students or associates in possession of a weapon will be immediately terminated and the police contacted.

Some examples of prohibited weapons include:

- Firearms (pistols, revolvers, shotguns, rifles and bb guns)
- Knives (switchblades, gravity knives, etc.)
- Metal knuckles
- Bows and arrows
- Tasers

## **Reporting Crimes or Other Emergencies**

If you observe any crime or if any person reveals to you that he/she learned of, was the victim of, perpetrator of, or witness of a crime, immediately inform the local police and the Campus Director. This crime may take the form of hate crimes, which manifest evidence that the victim was intentionally selected because of the victim's actual or perceived race, gender, religion, sexual orientation, ethnicity or disability. To protect individuals and encourage all crimes to be reported (and included in the annual disclosure of crime statistics), Cameo Beauty Academy will allow victims or witnesses to report crimes on a voluntary, confidential basis. Cameo Beauty Academy will initiate procedures of contacting the appropriate authorities and documenting the incident.

## **Timely Warning and Emergency Notification for Serious Crimes and/or Threats**

In the event that a situation arises that constitutes an ongoing or continuing threat to the health or safety of students and/or associates, Cameo Beauty Academy will immediately notify the campus community.

Since each Cameo Beauty Academy is contained within a small area, the existence of this threat will be confirmed at the specific location. Cameo Beauty Academy will, without delay, determine the content of the notification, and initiate the notification process. The notification will be issued by Campus Management via our Remind system or other appropriate means. The broader community will be made aware in a timely manner of any crimes, suspicious activities or other security problems through local police reports, which are published in the local newspaper.

## **Emergency Response and Evacuation Procedures**

In an emergency requiring building evacuation, students, associates and guests should evacuate through the nearest exit, taking only personal valuables that are in the immediate area. All emergency exit maps are posted throughout the campus. Do not return to offices and lockers. When the alarm sounds or when instructed via

announcement from a campus official, please remain calm and keep to the right of walkways when exiting the building. This allows emergency personnel to have unobstructed access throughout the building.

### **Medical Emergency**

In the event of a medical emergency requiring immediate action, persons should engage a campus associate to dial 911 for outside medical assistance. If an associate is not in the immediate area and the situation appears dire, the student should initiate the 911 call immediately.

### **CAMPUS CRIME STATISTICS**

Each year, as required by the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act, Cameo Beauty Academy ensures that three (3) years of crime data have been entered into the Department of Education's online Campus Safety and Security Survey portal.

Crimes that must be included in the data sets are:

- Criminal Offenses—Criminal Homicide, including: a) Murder and Non-negligent Manslaughter, and b) Negligent Manslaughter; Sex Offenses, including: a) Forcible, and b) Non-forcible; Robbery; Aggravated Assault; Burglary; Motor Vehicle Theft; and Arson.
- Hate Crimes—Any of the above-mentioned offenses, and any incidents of Larceny-Theft, Simple Assault, Intimidation, or Destruction/Damage/Vandalism of Property, that were motivated by bias; and
- Arrests and Referrals for Disciplinary Action for Weapons: Carrying, Possessing, Etc.; Drug Abuse Violations and Liquor Law Violations.
- Domestic violence, dating violence, and stalking incidents that were reported to CSA's or local police agencies.

Geographic areas associated with The Clery Act are:

- On-Campus – any building or property owned or controlled (leased) by an institution within the same reasonably adjoining geographic area and used by the institution in direct support of, or in a manner related to the institution's educational purposes. These buildings include residential halls, any building or property that is owned by the institution but controlled by another person, those frequently used by students and those that support institutional purposes such as a food or retail vendor. Any on-campus buildings would be the school itself. Note: Cameo Beauty Academy does not have residential halls.
- Non-Campus – includes any building (or property) owned or controlled by student organizations recognized by the school, as well as any building or property owned or controlled by the school that is not considered on-campus (above). Note: Cameo Beauty Academy does not have any non-campus buildings.
- Public Property – all public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus.

Crime statistics for Cameo Beauty Academy are disclosed below. Anyone who is interested in additional information on Campus Safety and Security Data may access the information through the following link: [www.cameobeautyacademy.com](http://www.cameobeautyacademy.com)

**2016-2018  
Cameo Beauty Academy**                      **Clery**                      **Crime**                      **Statistics**

Offenses	On Campus	Public Property	Non-Campus including Residential Housing (Not Applicable)	Unfounded Crimes
Murder/Non-negligent manslaughter				
2015	0	0		0
2016	0	0		0
2017	0	0		0
Manslaughter - Negligent				
2015	0	0		0
2016	0	0		0
2017	0	0		0
Fondling				
2015	0	0		0
2016	0	0		0
2017	0	0		0
Incest				
2015	0	0		0
2016	0	0		0
2017	0	0		0
Statutory Rape				

2015	0	0		0
2016	0	0		0
2017	0	0		0
Robbery				
2015	0	0		0
2016	0	0		0
2017	0	0		0
Aggravated Assault				
2015	0	0		0
2016	0	0		0
2017	0	0		0
Burglary				
2015	0	0		0
2016	0	0		0
2017	0	0		0
Motor Vehicle Theft				
2015	0	0		0
2016	0	0		0
2017	0	0		0
Liquor Law Arrests				
2015	0	0		0
2016	0	0		0
2017	0	0		0
Drug Law Arrests				
2015	0	0		0
2016	0	0		0
2017	0	0		0
Weapons Law Arrests				
2015	0	0		0
2016	0	0		0
2017	0	0		0
Liquor Law Violations Referred for Disciplinary Action				
2015	0	0		0
2016	0	0		0
2017	0	0		0
Drug Law				

Violations Referred for Disciplinary Action				
2015	0	0		0
2016	0	0		0
2017	0	0		0
Weapons Law Violations Referred for Disciplinary Action				
2015	0	0		0
2016	0	0		0
2017	0	0		0
Arson				
2015	0	0		0
2016	0	0		0
2017	0	0		0
Domestic Violence				
2015	0	0		0
2016	0	0		0
2017	0	0		0
Dating Violence				
2015	0	0		0
2016	0	0		0
2017	0	0		0
Stalking				
2015	0	0		0
2016	0	0		0
2017	0	0		0

No reported hate crimes for 2016-2018