

B.I.R. Training Center 2014 Annual Security Report and Fire Safety Report

I. Campus Security

B.I.R. Training Center (The School) encourages its community members to be fully aware of the safety issues on the campus, and to take action to prevent and to report illegal and inappropriate activities. Personal awareness and personal safety practices are the foundation of a safe community.

Pursuant to the Student Right to Know and Campus Crime Statistics Act, The School monitors criminal illegal activity and publishes this report. The data shown in this report is for the 2014 Calendar Year.

The School makes this report available to all and any student, employee and public in the following manner:

- a) The report is posted on the B.I.R. website (www.birtraining.edu);
- b) The hard copy of the report is posted in the "Public Access" binder.

The Annual Security Report is posted by October 1st of each year. The notice of the report's availability is provided verbally to prospective students and to prospective employees.

The notice of the report's availability online is provided to current students on Student Portal; and to the employees (administrative staff and faculty) by email by October 1st of each year. The notice includes URL, a description of the content.

Below are the School's current policies and procedures related to Campus Security. The School expressly reserves the right to modify them, or to adopt additional policies or procedures at any time. Such changes or additions may appear in the successive issues of this report.

II. Crime Reporting Policies

Reporting Policies

1. B.I.R. Training Center does not have a campus police or a security department. If a crime report needs to be made, the report should be made to the School's main office at 3601 West Devon, Suite 210, Chicago, IL 60659, Phone (773) 866-0111. This reporting policy applies to all school locations: Devon, Loop, Belmont and O'Hare.

Everyone on campus (including students, faculty, staff and visitors) is encouraged to report **immediately** any and all potential criminal activity to The School and/or the Chicago Police department.

2. The school normally requires a written complaint to begin the investigative process. The school usually needs the assistance of the complainant in the disciplinary process against the accused.
3. The School will accept third-party reports in cases of sexual assault, in order to protect the victim's identity.
4. The Business office at The School's main location keeps and maintains the written log of the crime reported on campus. Each incident (event) report includes the nature of the reported crime, the date and time, the location of the crime, disposition of the complaint (if known).

The Crime log for the most recent 60-day period is open to public inspection during the normal business

hours (Monday through Friday between 9 a.m. and 5 p.m.).

Any portion of the Crime log older than 60 days is made available for public inspection within two business days from the time of the request.

5. The log of criminal or illegal activity on campus is available in hard copy to the members of B.I.R. community and public at any time, for inspection. No written request or payment is needed to inspect the Crime Log.
6. The School issues the Annual Security Report that includes criminal statistics that took place at all school locations, non-campus building or property, and on public property, for the calendar year in which the crime was reported. The geographic breakdown of the statistics will be provided with the report.

The crime statistics provided by the local law enforcement agency (Chicago Police Department) regarding crimes alleged to have occurred within the area of 2 city blocks of B.I.R. campuses and facilities, owned or rented by the School, are included in the report.

7. The students have an option to notify the law enforcement authorities (local police) of the crime they wish to report.

The School's staff will assist the student in notifying the law enforcement authorities if the student requests the assistance.

B.I.R. Training Center locations:

Main location – 3601 W. Devon Avenue, Chicago
Loop Location – 828 S. Wabash Avenue, Chicago
Belmont Location – 6240 W. Belmont Avenue, Chicago.
O'Hare Location – 5440 N. Cumberland Avenue, Chicago

8. The annual report includes the statistics concerning the occurrence of the following reported Clery crimes:
 1. Criminal homicide:
 - a) Murder and non-negligent manslaughter
 - b) Negligent manslaughter
 2. Murder or manslaughter evidencing bias (hate crime)
 3. Sex offenses:
 - a) Forcible sex offenses
 - Forcible rape
 - Forcible sodomy
 - Sexual assault with an object
 - Forcible fondling
 - b) Non-forcible sex offenses
 - Incest
 - Statutory rape
 4. Violence Against Women:
 - a) Domestic Violence
 - b) Dating Violence
 - c) Sexual Assault
 - d) Stalking
 5. Violence Against Women:
 6. Robbery
 7. Robbery evidencing bias (hate crime)

8. Aggravated assault
9. Aggravated assault evidencing bias (hate crime)
10. Burglary
11. Burglary evidencing bias (hate crime)
12. Arson
13. Arson evidencing bias (hate crime)

The following reported statistics concerning other categories of Hate crime are also included:

1. Larceny-theft evidencing bias
2. Simple assault evidencing bias
3. Intimidation evidencing bias
4. Vandalism, destruction of property evidencing bias
5. Any crime involving bodily injury motivated by bias
6. The report also includes statistics of the reported arrests for:
 - liquor law violations,
 - drug law violations,
 - illegal weapon possession

Reporting Procedures

1. All criminal activity occurring at B.I.R. campus and on non-campus building should be reported immediately to the main office at 3601 W. Devon Avenue, Suite 210, Chicago, IL 60659, and/or to the Chicago Police Department (911 for emergencies or 311 for non-emergencies).
2. In addition, crime may be reported to:
 - The Campus manager or Business Office manager at Main office;
 - The Student Services Department at Devon or Loop locations;
 - The Manager at Loop campus (828 South Wabash Avenue, Chicago, IL 60605);
 - The Manager-on-duty present at any location.
 - By employees to Human Resources department
3. In addition, the faculty members may make reports of the alleged crime to the Faculty manager.
4. The victims or witnesses, who wish to report the crime on voluntary, confidential basis, may do
5. so at their discretion. The crimes reported in this manner will be subject to the inclusion in the Annual report.
6. Every effort should be made to ensure that physical evidence is maintained and protected.
7. Timely reporting will assist in preserving of the evidence.

Policies Regarding School's Response

The campus community will be immediately notified upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on campus.

1. All allegations regarding Cleary Act crimes brought to the attention of BIR Training Center will be referred to the Chicago Police Department for investigation.
2. Reports will be classified by The School Main Office in conjunction with the appropriate police agency according to the FBI Uniform Crime Reporting Definitions.
3. When alleged perpetrators are identified as students, the case will be forwarded to The School Management for investigation and appropriate action. Criminal investigation, arrest and prosecution can

occur independently, before, during or after the campus judicial Process completed.

Timely Warning Notice Procedure

In an effort to notify the School community of serious or ongoing crime, timely warning notices will be disseminated to alert individuals and aid in the prevention of similar crimes.

1. The management team will meet to determine if a serious, ongoing threat to the community exists. The incidents will be evaluated on a case-by-case basis. The school will issue a timely warning to members of the campus community in cases of reported murder, sex offenses, robbery, aggravated assault, burglary, arson and any hate crimes (manifesting evidence of prejudice and bias based on race, religion, sexual orientation or ethnicity) of murder, forcible rape or aggravated assault and motor vehicle theft.
2. The school will respond to emergency in case of fire, natural disaster, alleged criminal activity which threatens the physical safety of the members of the community, in a timely, responsible and efficient manner.
3. All students, staff, and faculty are issued an email address, and are provided an Orientation at the start of their association with The School. The Orientation includes the guidance as to the personal and property safety and crime reporting. During the Orientation the members of the community are provided training how to access the Student Portal, Employee email and phone network, and Instructor Portal respectively.

The timely warnings and responses are issued on Student Portal to students; on Instructor Portal to Faculty; and by email to "All Staff" email to employees.

The School will determine the appropriate segment of the community to receive the emergency notification, determine the content of the notification, and will initiate the notification without delay, unless issuing a notification will or may compromise efforts to assist a victim, or to respond to the emergency.

The following persons and departments are responsible for carrying out the responsibilities associated with the issuance of the timely warnings:

| | System to use | Primary Message Creator | Backup Message Creator | Authority For Approving & Sending Messages |
|-----------|--------------------------------|---------------------------------------|---------------------------------------|---|
| Primary | Email to staff, Student Portal | Business Manager | Manager on Duty or Registrar | Chief Information Officer |
| Secondary | Signs, Social Media, Website | Student services manager or Registrar | Manager On Duty or Enrollment manager | Business Manager or Director of Academic Affairs |

School will make a reasonable effort to disseminate emergency information to the larger community, including seeking the assistance from local law enforcement. The Emergency warning or information may be placed on the School's website.

4. The School initiates the Emergency response and evacuation test procedure on annual basis. The Test is the Emergency response and evacuation procedure is conducted on campuses by the Operation department, with the assistance of Campus managers.

III. Policies Concerning Safety of and Access to Campus Facilities:

A. Personal Security Recommendations

1. BIR Training Center and the management of 3601 W. Devon Avenue, 828 S. Wabash, 6240 W. Belmont and 5440 N. Cumberland do not provide security patrols or escorts. Only you can protect yourself by being aware of your surroundings and taking appropriate steps in preventing crime from happening.
2. Facilities Emergency Guidance is located on the employees Intranet Network. The document is updated annually.
3. Protect your property:
 - (i) Personal property should never be left unattended. If you are leaving the building or classroom, take the personal property items with you.
 - (ii) Take valuables home with you at the end of class.
4. Protect your automobile:
 - (i) Always lock your car doors and never leave your keys in the vehicle.
 - (ii) Try to park your car in a well-lit area.
 - (iii) Avoid leaving property where it is visible.
5. Protect yourself at night:
 - (i) Avoid walking alone at night.
 - (ii) Refrain from taking shortcuts; walk where there is plenty of light and traffic.
6. Help us protect you: Watch for suspicious persons in and around college buildings and in parking lots. Do not pursue them. Call the Chicago Police Department immediately.
 - a. Suspicious activity:
 - (i) If you see any suspicious activity or people on or near campus, call the Chicago Police Department immediately (911 for emergencies or 311 for non-emergencies). Do not assume that what you observe is an innocent activity or that it has already been reported.
 - b. Suspicious people may be:
 - (i) Loitering about at unusual hours and locations; running, especially if something of value is being carried.
 - (ii) Exhibiting unusual mental or physical symptoms. Person(s) could be under the influence of drugs or otherwise needing medical or psychiatric assistance.
 - (iii) Carrying property that might be suspicious, depending on the circumstances, going from room to room trying door handles.
 - c. Report all thefts and property loss immediately.
- d. Be security conscious at all times

B. Security Considerations of Campus Facilities

1. Building access and maintenance:
 - a. The School campus is for the use of the students, faculty, staff and their guests and those on official business with The School. All others are subject to being charged with trespassing.
 - b. Access to locations buildings is usually limited to normal business hours.

2. Students, faculty, staff and visitors are encouraged to report needed repairs to the School Main Office.
 - a. Keys are issued to authorized faculty and staff only.
 - b. Exterior building doors should NOT be blocked open when the doors are locked.
 - c. Building evacuation is mandatory for all fire alarms.
 - d. Individual academic buildings are normally open from 8:00 a.m. until 8 p.m. and for scheduled weekend classes and special events.
 - e. Faculty and staff are instructed during orientation regarding the correct lock up procedure for specific campuses and non-campus building.
 - f. Exit signs are clearly marked.
 - g. Problems related to people in buildings after hours should be reported immediately to the Chicago Police Department (911 for emergencies or 311 for non-emergencies).

C. Emergency Response Procedures

The School has developed contingency plans and continuity of operations plans for their staff and areas of responsibility.

Depending on the nature of the incident, The School departments and local or federal agencies could also be involved in responding to the incident.

In the event that a situation occurs on or off campus which poses a threat to the School community, a notice shall be issued to the members of School community. The notice may take the form of an **emergency notification** when there is an immediate threat to the health or safety of students or employees on campus. Notices may be issued using some or all of the systems listed below:

- E-mail alerts to the School community;
- The School website www.birtraining.edu;
- Student portal, instructor portal;
- Warning posters;
- Message Boards in common areas.

Most emergency notifications will be issued through email alerts, but may be supplemented through other notification methods listed below.

| | System to use | Primary Message Creator | Backup Message Creator | Authority For Approving & Sending Messages |
|-----------|--------------------------------|---|---------------------------------------|---|
| Primary | Email to staff, Student Portal | Business Manager | Registrar or Manager on Duty | Director of Academic Affairs or Chief Inform. Officer |
| Secondary | Signs, Social Media, Website | Student services manager or Manager on Duty | Enrollment manager or Faculty manager | Business Manager or Chief Inform. officer |

The Business Manager or her designee shall notify the local police department of the emergency, to ensure notification to the larger community and coordinate efforts to alleviate the threat. The larger community can access information regarding an emergency on campus via the website, social media or local/national media.

The Business office is responsible for confirming an emergency, with the assistance of administration of The School, local law enforcement and fire officials, and the national weather service. The Business manager should consult the local police department to determine on a case-by-case basis of when an emergency or dangerous situation threatens the School community, and whether to issue a notice.

In emergency situations the following authorities should be notified, as they may immediately issue an emergency notification to the School community:

Business Manager – Ms. Zina Bousson, 3601 W. Devon Avenue, Chicago, 2nd floor, Tel: (773) 977-1412

Manager of Student Services – Mr. Michael Glatt, 3601 W. Devon Avenue, Chicago, 2nd floor, or 828 S. Wabash, Chicago, 2nd floor; Tel: (773) 866-0111 ext. 513

Faculty Manager – Mr. Andre Guerra, 3601 W. Devon Avenue, Chicago, 2nd floor, or 828 S. Wabash, Chicago, 2nd floor; Tel: (773) 977-1419

Registrar – Ms. Ezella Montgomery, 3601 W. Devon Avenue, Chicago, 2nd floor, or 828 S. Wabash, Chicago, 2nd floor; Tel: (773) 977-1416

Senior Systems Network Administrator – Mr. Edward Verbitski, 3601 W. Devon Avenue, Chicago, 2nd floor. Tel: (773) 977-1499.

Chicago Police Department: Tel: 911

The School tests its emergency notification systems at the beginning of each school year.

D. Evacuation Plan

In certain emergencies, it is necessary that students, faculty and staff vacate the School facilities. In order to ensure an orderly and safe evacuation, all members of the community should be familiar with these guidelines.

Static Evacuation

In some instances it may be necessary to remain inside facilities due to outside threats (such as tornadoes, civil disturbances, chemical or biological attacks, snipers or active shooters). The Campus managers and the Business office will be responsible for informing the landlords for the shutdown of HVAC units as necessary.

Building Evacuation

In the instances of fire, bomb threats, earthquakes, it may be necessary vacate the buildings. Familiarize yourself with the locations of fire extinguishers and exit signs in the buildings you frequent.

When a total building or partial building must be evacuated due to conditions making it no longer safe to remain inside, or a specific area within a building, a fire alarm will be sounded or other emergency communication will be used. In those circumstances, occupants (students, staff, faculty and visitors) must take the following actions:

Contain fires by closing doors behind you, and exit the building using the nearest safe exit.

Do not congregate at the entrance of the building. Do not block the entrance and exits.

Do not use elevators; only use stairways.

Do not re-enter the building unless the all clear has been given.

Notify the proper authorities (dial 911) with any useful information, particularly if anyone is in need of assistance. Individuals should assist people with disabilities exit the building.

Advance Evacuations

In some cases it may be necessary to evacuate the entire School community from all campuses and non-campus building, or from city.

Students, faculty, and staff shall maintain updated records with the School, for emergency contact information.

The School may use this information to contact individuals in the event of evacuation. The School will use available communications systems, including the School website and email to provide pertinent information throughout the evacuation and reentry process.

In situations which necessitate evacuations from School facilities, Location managers or Managers-on-Duty will be predetermined to ensure that everyone in their designated area has evacuated that area.

The emergency response and evacuation plans shall be reviewed on a recurring basis no less than annually. Fire extinguishers are tested annually by the fire marshal.

IV. Policies and Procedures Concerning Law Enforcement:

- A.** The School does not employ a security staff and does not have a campus police or security department.
Chicago Police Officers will be called in to handle all suspected or reported criminal activity.
- B.** Report all crime immediately! All criminal activity should be reported immediately to the Chicago Police department (dial 911 for emergencies or 311 for non-emergencies) and, when it is safe, to the School Main office.
 - 1. The School will assist the complainant in completing the crime reports.
 - 2. The School will accept the third party reports in certain cases, such as sex offenses. The School prefers to receive reports from the victim, as the details are often more accurate when received directly from the victim.
 - 3. Maintain all physical evidence. Do not wash or destroy what may be the critical evidence.
- C.** Report as much detail as possible to ensure accurate reporting. If you are a victim of a crime, your immediate recall of the event is often the best.
As recommended for the reporting of the crime to the Police department, write down as much information as you know and remember after a crime. If the perpetrator could not be identified by name, the following details are recommended to be specified: gender, approximate age, height,

weight/build, description of face, eye color, hair color, dress/clothing, facial hair, glasses, scars or other distinguishing marks, voice.

- D.** The school obtains from the Chicago Police Department the statistics of crime committed in the area of 2 city blocks of all campuses on annual basis. There is no written agreement between the School and any of the local Law Enforcement agencies. The School follows its procedure of obtaining the statistics, as follows:

The School communicates annually with the Research and Analysis department of the Chicago Department of Police, to gather data on the crime statistics at and around the campus of the School.

Each year, during the months of February-March, The School submits to the Research and Development Division of the Police department the request for crime statistics of the previous calendar year. The requested data must cover the area of 2 city blocks surrounding each of the School campuses.

The data is received by the Student services Department usually between May and July. The statistics received are for the previous calendar year.

The data is used to comply with the Federal Law, 20 U.S.C 1092(f), known as Clery Act.

- E.** Persons filing a crime report with the School will be provided a copy of the School's policies and procedures.
- F.** Any employee or faculty member, who becomes aware of an allegation of the School's policy, student code of conduct, civil or criminal law, should report the allegation to their supervisor and to the designated managers and office listed in Part II, Section B.1, 2, 3 and 4 of this report.
- G.** It is recommended that the individuals should not attempt to investigate but should instead report the crime.
- H.** All persons in the B.I.R. Training Center community are encouraged to assist anyone in reporting the alleged criminal activity, as well as providing assistance in making the report.

V. Programs to Educate the School Community Regarding Security:

- A.** The Orientations for new students, employees and faculty incorporate security and safety training. Additional training sessions are provided periodically as the needs of the school dictate.
- B.** The maps depicting campuses and non-campus building, and floor plans are located in the School offices. The maps are available for prospective students and employees.
- C.** BIR Training Center encourages students, visitors, and employees to be responsible for their own security and the security of others.
- D.** The School can help interested individuals find materials on the Internet regarding various safety and security issues and provide referrals for students in coping with alcohol and drug abuse.

VI. Monitoring and Recording Activity at Off-Campus Locations:

- A.** Off-campus School-sponsored activities will be monitored by the Chicago Police Department, which shares information with The School.

- B.** The School includes the off-campus crime statistics in its Annual Security Report.

VII. Policy Regarding the Illegality of Alcoholic Beverages on Campus and Enforcement of Under-Age Drinking Laws:

- A.** The School forbids the consumption, possession, manufacture, sale, transportation or furnishing of the alcoholic beverages. The prohibition of possession or consumption of alcoholic beverages applies regardless of age. The only exception is authorized use for special functions. Only the President may authorize such programming use.
- B.** The School enforces the Illinois drinking laws, including the prohibition of use by persons who are under 21 years of age. Possession or consumption of alcohol is prohibited by The School and may result in the disciplinary sanction.
- C.** If the accused is not cooperative or is underage, the Chicago Police Department may be called to assist.

VIII. Policy Regarding the Illegality of Drugs on Campus and the Enforcement of Federal and State Drug Laws

- A.** The School will comply with the Drug-Free Schools and Communities Act at all times.
- B.** The School forbids the possession, use or sale of drugs (other than by a doctor's prescription). This includes but is not limited to possession, sale, use, growing, manufacturing and making of narcotic drugs.
- C.** The School enforces both Illinois and Federal drug laws regarding the use, possession, and sale of illegal drugs and will call the Chicago Police Department to assist.
- D.** The School will impose sanctions on students and employees who violate drug and alcohol laws, ordinances, and the school policies.

IX. Drug and Alcohol Abuse Education Programs and Prevention Plan.

- A.** The purpose of this policy is to set forth The School's policy regarding alcohol and other drug use, including unlawful drug use or abuse in the workplace in accordance with the Drug Free Workplace Act of 1988 (Public Law 100-690, Title V, Subtitle D) and Drug Free Schools and Communities Act Amendments of 1989 (Public Law 101-226). A copy of the Drug Free Workplace information may be obtained from the Student & Administrative Services Office.
- B.** The School recognizes the reality of chemical dependency and is aware of possibility of its occasional presence in the school community.
- C.** The School will provide reasonable assistance to any student, faculty or staff member who seeks information on chemical dependency or treatment for chemical dependency.
- D.** The School makes the educational information available regarding the risks associated with the use of drugs and alcohol. The educational pamphlets and the Institutional Drug-Free Environment Notice are located in the Student Services offices, the student lounge area, in the employee lounge area and in the Academic counseling offices.

X. Policy Regarding Sexual Assault, Sexual Offenses and Violence Against Women

Policy

1. Sexual abuse, sexual harassment, and violence against women will not be tolerated. Every effort will be made to assure that all members of the school community are provided an atmosphere free from sexual abuse, sexual harassment, and violence against women.
2. A guiding principle in the reporting of sexual assault is to avoid re-victimizing the sexual assault survivor by forcing the person into any plan of action. Sexual assault victims should contact The School's Main Office and law enforcement authorities for assistance.
3. The School will assist the victims of sex offenses and domestic violence to identify and obtain the services of the off-campus counseling.

Procedures regarding Sexual Offences and Violence Against Women

4. Contact the Chicago Police Department (911 for emergencies or 311 for non-emergencies) as soon as possible. Please remember it is most important to preserve evidence. Do not bathe, douche, use the toilet, or change clothing. Note everything about the location. If you have been raped, you should seek medical attention immediately regardless of whether you report the matter to the police.
5. Every attempt is made to maintain the anonymity of the sexual assault survivor. Every attempt will be made not to release names to the media. Unless requested by the sexual assault survivor, names and addresses of survivors are released to the Chicago Police Department. Each report of sexual assault will be investigated in order to provide better protection to the survivor of a sexual assault and all members of the community. Sexual assault survivors should be aware of the need of the school to release information (for the protection and safety of others) regarding the fact that an assault has occurred.
6. The School's Main Office is the office of official record for reports of sexual assault, as it is in all reported law violations. Students, faculty, visitors, and staff are encouraged to contact The School to report any information regarding assaults.
7. Sexual assault victims have the right to have reports made anonymously (third party) to the Chicago Police Department. The School will assist the survivor in making this report if the survivor so wishes. In these situations, the name of the complainant will not be forwarded. Third party reports may prevent The School and the Chicago Police Department from actively investigating the criminal activity.
8. If you are the victim of a sexual assault, BIR Training Center encourages you to contact Chicago Rape Crisis Hotline 1-888-293-2080
9. If The School and/or premises management determine that a threat continues to exist for the community, information about the reported sexual assault will be reported to the campus community whether reported by a sexual assault survivor or through a third-party report. As much detail as possible regarding location, date and time of the assault, and any information that might help identify the assailant will be reported. The method(s) of communication may be in the form of posters, appropriate notices, website announcements, etc.
10. Each report will be taken as presented by the complainant. Appropriate criminal classifications will be determined after a review of all facts by the Chicago Police Department personnel.
11. The School will take appropriate action to safeguard the alleged victim and, at the same time,

protect the rights of the alleged perpetrator. If the victim of a sexual offense requests, The School will attempt to provide, if reasonably available, the change in class schedule or class location.

12. In accordance with preliminary guidance issued by the Department of Education regarding the reporting of violations of the Violence Against Women Reauthorization Act of 2013 (“VAWA”), and regarding the implementation of policies and procedures pertaining to VAWA, beginning in 2013 The School:
 - a) encourages women who are victims of domestic violence, dating violence, sexual assault or stalking to report any such occurrences to the School Management and to the Chicago Police Department
 - b) collects data regarding violations of VAWA
 - c) reports data regarding violations of VAWA in The School’s 2013 Annual Security Report, and every ASR thereafter
 - d) supports women who are victims of VAWA violations in securing counseling from relevant social service agencies
 - e) the School refined and expended policies and procedures which support the purpose and spirit of VAWA.
13. Both the accuser and the accused will be informed of the Final determination and any sanction that was imposed against the accused, in cases involving the allegation of a sex offence.
14. The accuser and accused are entitled to the same opportunities to have others present during a disciplinary proceedings, for the purpose of support.

Sexual Misconduct Policy and Procedures

The following policy and procedures were developed during 2014-2015 school year, in order to expand the policy in the paragraph X. of this report regarding Sexual offences.

Policy on Sexual Misconduct and Sex Discrimination

I. POLICY

B.I.R. Training Center is committed to taking necessary action to prevent, correct, and where indicated, discipline any instances of sexual misconduct and sex discrimination.

Sexual misconduct violates the standards of our community, and is unacceptable at the B.I.R. People who believe they have experienced any sexual misconduct are encouraged to report the incident and to seek medical care and support as soon as possible.

This policy expresses the school’s commitment to an environment free from sexual harassment, sexual misconduct, sexual assault, domestic violence, dating violence, and stalking. It applies to students and other program participants, staff, and faculty.

This policy applies to misconduct that occurs: (1) on school’s property or (2) off school’s property, if: (a) the conduct occurred in connection with school or school-sponsored activity; or (b) the conduct has or reasonably may have the effect of creating a hostile educational or work environment for a member of the school community.

II. DEFINITIONS OF SEXUAL MISCONDUCT

“Dating violence” means the use or threat of use of physical, mental or emotional abuse, or sexual violence by a person who is in a social relationship of a romantic or intimate nature with the victim.

“Domestic violence” means harassment, interference with personal liberty, intimidation of a dependent, physical abuse, or willful deprivation by a person who is or was a family or household member of the victim.

“Sexual abuse” means an act of sexual conduct:

By the use of force or threat of force; or

When the accused knew that the victim was unable to understand the nature of the act or was unable to give knowing consent; or

Where the accused is under 17 years of age and the victim was at least 9 years of age but under 17 years of age when the act was committed; or

In which the accused delivered (by injection, inhalation, ingestion, transfer of possession, or any other means) to the victim without his or her consent, or by threat or deception, and for other than medical purposes, any controlled substance.

“Sexual assault” means an act of sexual penetration:

By the use of force or threat of force, including threatening or endangering the life of the victim.

“Sexual conduct” means any intentional or knowing touching or fondling by the victim or the accused, either directly or through clothing, of the sex organs, anus, or breast of the victim or the accused, or any part of the body of a child under 13 years of age.

“Stalking” means a course of conduct (two or more acts) directed at a specific person that would cause a reasonable person to fear for her or his safety or the safety of a third person, or to suffer emotional distress. Stalking behavior includes, but is not limited to: following a person; appearing at a person’s home, work, or school; making unwanted phone calls; sending unwanted e-mails or text messages; leaving objects for a person; vandalizing a person’s property; placing a person under surveillance.

III. REPORTING AND NON-RETALIATION

Complaints or concerns about violations of this policy should be submitted to the Manager-on-Duty and/or Business manager. All complaints and concerns will be treated as confidentially as is feasible and will be addressed.

The school will protect privacy and confidentiality to fulfill its commitment to address complaints of sexual misconduct fairly and expeditiously.

All parties and witnesses involved in an investigation or hearing under this policy are prohibited from disclosing, at any time and through any medium (including social media), the identity of the parties and witnesses, and any details or information regarding an incident, investigation, or hearing to anyone except:

- (1) To school employees as necessary to implement any provisions of this policy or the business of the school; or
- (2) As permitted or required by law.

IV. INFORMAL RESOLUTION OF COMPLAINTS THAT DO NOT INVOLVE SEXUAL ASSAULT

The school’s procedures of handling incidents depend on the nature of the incident, and to the extent possible, the wishes of the person bringing forward the complaint. Under TITLE IX, the school has an obligation to investigate all allegations of sexual misconduct, including sexual assault, sexual harassment, domestic violence, dating violence, stalking, rape, and acquaintance rape about which a “responsible employee” knows or should have known. All members of the faculty and staff are obligated to report sexual misconduct to the Department chair or supervisor, Business Office and Human Resources.

If informal discussion with the person accused of misconduct does not resolve the matter, or if the complainant prefers, the complainant may make use of the formal investigation.

V. FORMAL INVESTIGATION AND RESOLUTION OF COMPLAINTS

Anyone may choose to bring forward a complaint within the school instead of, or in addition to, seeking redress outside the institution in the legal system. Someone with a complaint of sexual assault, domestic violence, dating violence or stalking may also opt to pursue his or her complaint via the legal system without engaging the school's disciplinary process.

The school is committed to providing a prompt, fair, impartial, and thorough investigation and resolution that is consistent with the school's policies.

In most cases, the school's investigation will be completed within 60 days of a complaint, whenever possible.

The complainant, the respondent, and appropriate school officials will receive timely and equal access to information that will be used during disciplinary proceedings.

Sanctions for a student found responsible for sexual assault, domestic or dating violence, or stalking include but are not limited to warning, probation, restrictions regarding access to school property or school events, discharge from student employment, suspension, and expulsion.

For employees (staff and faculty), possible sanctions are suspension, demotion, salary decrease, termination of employment or appointment, disqualification from future employment.

Anonymous Reporting

If a complaint discloses an incident or incidents of sexual misconduct to the school but asks to remain anonymous during the investigation, the investigators will consider how to proceed, taking into account the complainant's wishes.

Time Limits

There is no time limit for filing a complaint of sexual misconduct. However, complainants should report as soon as possible to maximize the school ability to respond promptly and effectively.

Title IX Coordinator

The School designated the employee, Business Manager Ms. Zina Bousson, to coordinate the school's efforts to comply with and carry out the responsibilities under Title IX of the Education Amendments of 1972, which prohibits sex discrimination in education programs and activities.

The above employee is the school's Title IX coordinator as of July 1, 2015.

The Title IX coordinator's responsibilities and authority:

- a) Coordinate the school's compliance with Title IX, including the grievance procedures for resolving Title IX complaints.
- b) Be informed of all reports and complaints raising Title IX issues.
- c) Coordinate the responses to all complaints involving possible sex discrimination.
- d) Must be involved in drafting and revision of any guidelines or policies and procedures on sex discrimination.
- e) Participate in any Title IX-related investigation, hearing, or proceeding.

| Criminal Offenses | | | | | | | | | |
|--|------|------|------|------|--|------|------|------|------|
| | 2011 | 2012 | 2013 | 2014 | | 2011 | 2012 | 2013 | 2014 |
| Murder/Non-Negligent Manslaughter | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Negligent Manslaughter | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Forcible Sex Offenses | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Non-Forcible Sex Offenses | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Robbery | 0 | 0 | 0 | 0 | | 3 | 0 | 0 | 0 |
| Aggravated Assault | 0 | 0 | 0 | 0 | | 0 | 1 | 0 | 0 |
| Burglary | 3 | 0 | 0 | 0 | | 0 | 0 | 0 | 1 |
| Motor Vehicle Theft | 0 | 0 | 0 | 0 | | 8 | 2 | 0 | 0 |
| Arson | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| | | | | | | | | | |
| Hate Crimes | | | | | | | | | |
| | 2011 | 2012 | 2013 | 2014 | | 2011 | 2012 | 2013 | 2014 |
| Murder/Non-Negligent Manslaughter | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Negligent Manslaughter | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Forcible Sex Offenses | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Non-Forcible Sex Offenses | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Robbery | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Aggravated Assault | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Burglary | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Motor Vehicle Theft | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Arson | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Any Other Crimes Involving Bodily Injury | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |

| Arrest | | | | | | | | | |
|---|------|------|------|------|--|------|------|------|------|
| | 2011 | 2012 | 2013 | 2014 | | 2011 | 2012 | 2013 | 2014 |
| Liquor Law Violations | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Drug Law Violations | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 2 |
| Illegal Weapons Possession | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Disciplinary Actions/Judicial Referrals | | | | | | | | | |
| Liquor Law Violations | 0 | 0 | 0 | 0 | | 3 | 0 | 0 | 0 |
| Drug Law Violations | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 2 |
| Illegal Weapons Possession | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Violence Against Women | | | | | | | | | |
| Domestic Violence | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Dating Violence | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Sexual Assault | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Stalking | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |

| Criminal Offenses | | | | | | | | | |
|--|------|------|------|------|--|------|------|------|------|
| | 2011 | 2012 | 2013 | 2014 | | 2011 | 2012 | 2013 | 2014 |
| Murder/Non-Negligent Manslaughter | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Negligent Manslaughter | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Forcible Sex Offenses | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Non-Forcible Sex Offenses | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Robbery | 0 | 0 | 0 | 0 | | 3 | 1 | 0 | 3 |
| Aggravated Assault | 0 | 0 | 0 | 0 | | 0 | 1 | 0 | 0 |
| Burglary | 3 | 0 | 0 | 0 | | 0 | 0 | 1 | 2 |
| Motor Vehicle Theft | 0 | 0 | 0 | 0 | | 8 | 3 | 0 | 2 |
| Arson | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| | | | | | | | | | |
| Hate Crimes | | | | | | | | | |
| | 2011 | 2012 | 2013 | 2014 | | 2011 | 2012 | 2013 | 2014 |
| Murder/Non-Negligent Manslaughter | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Negligent Manslaughter | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Forcible Sex Offenses | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Non-Forcible Sex Offenses | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Robbery | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Aggravated Assault | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Burglary | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Motor Vehicle Theft | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Arson | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Any Other Crimes Involving Bodily Injury | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |

| Arrest | | | | | | | | | |
|--|------|------|------|------|--|------|------|------|------|
| | 2011 | 2012 | 2013 | 2014 | | 2011 | 2012 | 2013 | 2014 |
| Liquor Law Violations | 0 | 0 | 0 | 0 | | 0 | 1 | 0 | 0 |
| Drug Law Violations | 0 | 0 | 0 | 0 | | 0 | 1 | 0 | 3 |
| Illegal Weapons Possession | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Disciplinary Actions/Judicial Referrals | | | | | | | | | |
| Liquor Law Violations | 0 | 0 | 0 | 0 | | 3 | 0 | 0 | 0 |
| Drug Law Violations | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Illegal Weapons Possession | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Violence Against Women | | | | | | | | | |
| Domestic Violence | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Dating Violence | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Sexual Assault | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Stalking | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |

| Criminal Offenses | | | | | | | | | |
|--|------|------|------|------|--|------|------|------|------|
| | 2011 | 2012 | 2013 | 2014 | | 2011 | 2012 | 2013 | 2014 |
| Murder/Non-Negligent Manslaughter | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Negligent Manslaughter | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Forcible Sex Offenses | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Non-Forcible Sex Offenses | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Robbery | 1 | 0 | 0 | 0 | | 3 | 1 | 1 | 0 |
| Aggravated Assault | 0 | 0 | 0 | 0 | | 4 | 0 | 1 | 0 |
| Burglary | 3 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Motor Vehicle Theft | 0 | 0 | 0 | 0 | | 8 | 1 | 0 | 1 |
| Arson | 0 | 0 | 0 | 0 | | 1 | 0 | 0 | 0 |
| | | | | | | | | | |
| Hate Crimes | | | | | | | | | |
| | 2011 | 2012 | 2013 | 2014 | | 2011 | 2012 | 2013 | 2014 |
| Murder/Non-Negligent Manslaughter | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Negligent Manslaughter | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Forcible Sex Offenses | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Non-Forcible Sex Offenses | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Robbery | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Aggravated Assault | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Burglary | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Motor Vehicle Theft | 0 | 0 | 0 | 0 | | 0 | 0 | 1 | 0 |
| Arson | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Any Other Crimes Involving Bodily Injury | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |

| Arrest | | | | | | | | | |
|--|------|------|------|------|--|------|------|------|------|
| | 2011 | 2012 | 2013 | 2014 | | 2011 | 2012 | 2013 | 2014 |
| Liquor Law Violations | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Drug Law Violations | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Illegal Weapons Possession | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Disciplinary Actions/Judicial Referrals | | | | | | | | | |
| Liquor Law Violations | 0 | 0 | 0 | 0 | | 3 | 0 | 0 | 0 |
| Drug Law Violations | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Illegal Weapons Possession | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Violence Against Women | | | | | | | | | |
| Domestic Violence | 0 | 0 | 0 | 0 | | 0 | 0 | 1 | 0 |
| Dating Violence | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Sexual Assault | 0 | 0 | 0 | 0 | | 0 | 0 | 8 | 0 |
| Stalking | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |

| Criminal Offenses | | | | | | | | | |
|--|------|------|------|------|--|------|------|------|------|
| | 2011 | 2012 | 2013 | 2014 | | 2011 | 2012 | 2013 | 2014 |
| Murder/Non-Negligent Manslaughter | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Negligent Manslaughter | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Forcible Sex Offenses | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Non-Forcible Sex Offenses | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Robbery | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Aggravated Assault | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Burglary | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Motor Vehicle Theft | 0 | 0 | 0 | 1 | | 0 | 0 | 0 | 0 |
| Arson | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| | | | | | | | | | |
| Hate Crimes | | | | | | | | | |
| | 2011 | 2012 | 2013 | 2014 | | 2011 | 2012 | 2013 | 2014 |
| Murder/Non-Negligent Manslaughter | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Negligent Manslaughter | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Forcible Sex Offenses | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Non-Forcible Sex Offenses | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Robbery | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Aggravated Assault | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Burglary | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Motor Vehicle Theft | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Arson | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Any Other Crimes Involving Bodily Injury | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |

| Arrest | | | | | | | | | |
|--|------|------|------|------|--|------|------|------|------|
| | 2011 | 2012 | 2013 | 2014 | | 2011 | 2012 | 2013 | 2014 |
| Liquor Law Violations | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Drug Law Violations | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 1 |
| Illegal Weapons Possession | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Disciplinary Actions/Judicial Referrals | | | | | | | | | |
| Liquor Law Violations | 0 | 0 | 0 | 0 | | 0 | 0 | 1 | 0 |
| Drug Law Violations | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Illegal Weapons Possession | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Violence Against Women | | | | | | | | | |
| Domestic Violence | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Dating Violence | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Sexual Assault | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |
| Stalking | 0 | 0 | 0 | 0 | | 0 | 0 | 0 | 0 |