

Campus Safety and Security Policy

1. INTRODUCTION:

This document has been designed to inform all students and employees about the school's safety and security procedures and policies. A copy of this policy is located on the school's website at www.paulmitchell.edu/sarasota or a hard copy can be obtained from the School Director, Shaun Chiodo shaunc@sarasota.paulmitchell.edu. The annual disclosure document is done each year by contacting the local police department and/or the building management to compile the statistics used in the report. All crimes are reported based on the calendar year in which the crime was reported to local police agencies or to the School Director/Campus Security Coordinator. The safety of our students and employees is an important concern of the school's administration. This document explains this school's policy regarding crime and accident prevention, public safety, criminal and accident reporting procedures, and fire safety. Read this document carefully, and ask questions if you are confused or uncertain.

During the first week of a new class, at orientation for new students and employees, as well as by October 1st of each year, each student and employee is informed of the school's campus security report, procedures, and safety practices. In addition, students and employees will receive a written notice that will include: 1) a statement of the report's availability; 2) a statement that a paper copy will be provided upon request and how to obtain one; 3) a brief description of the contents; and 4) the exact electronic address of the report. We also review with students and employees the need to be responsible for their own security and safety at all times. The orientation includes training on emergency procedures, preventing crime, how to protect oneself and others from sexual assault, the Violence Against Women Act, and Title IX. In October of each year, we bring a local law enforcement official into the school to review how to protect yourself against crime, how to be responsible for your own safety, and how to protect yourself against sexual assault.

Paul Mitchell the School Sarasota, herein referred to as "school" or "institution," uses the following policy and procedures:

2. DEFINITION OF CAMPUS:

For the purposes of reporting campus crimes, the definition of the school's campus includes:

**501 North Beneva Rd
Ste 620
Sarsota FL 34232**

3. CRIME & ACCIDENT PREVENTION

The school does not assume liability for stolen property. Therefore, students and employees should always keep their personal belongings locked in the student lockers, which have been provided. The school encourages students and staff not to bring expensive jewelry, money, or other valuables to the school. Such items should be left at home in order to reduce the chance of theft.

The school reserves the right to prosecute any student or employee to the full extent of state and United States federal law for any criminal violation committed on the school premises. The school will take into consideration the specifics of any student who may be accused of a crime on a case-by-case basis, which may include suspension or termination from school. Criminal violations may include, but may not be limited to the following:

- Murder
- Rape
- Forcible sex offenses
- Non-forcible sex offenses

Campus Safety and Security Policy

- Robbery/theft
- Simple or aggravated assault
- Unlawful consumption or possession of alcohol or other controlled or illegal substance
- Hate crime including larceny-theft, simple assault, intimidation, or vandalism
- Burglary — There must be evidence of both trespass and intent to commit a felony or theft.
- Larceny — Larceny is the illegal taking and carrying away of personal property belonging to another with the purpose of depriving the owner of its possession.

Further preventative measures include:

1. Students and/or employees shall **not** be permitted to consume illegal or controlled substances, including alcoholic beverages, during school hours or at school functions.
2. Students and/or employees shall **not** be permitted to have any illegal or otherwise dangerous weapons in their possession or on school property. Such a violation will result in the confiscation of the weapon, possible prosecution, and possible termination from enrollment or employment.
3. Students and/or employees must keep their property securely locked in the designated areas in order to prevent theft.
4. Students and/or employees must park in the designated areas and should keep their cars securely locked.
5. Students and/or employees must never remain alone within the facility after closing without administrative approval. If approval has been given, the outside door must remain locked at **ALL** times, and the student/employee must not allow any unauthorized individual entrance.
6. All employees should make certain that the offices remain securely locked at **all** times. When leaving the office, employees **must** always check the door to ensure it is secure.
7. Employees should never lock the facility alone. Two people **must** always be present during locking procedures. The individuals should check to ensure that both have entered their vehicles safely upon leaving the school premises.
8. Students and/or employees shall report hazardous conditions (i.e., faulty or broken equipment, water leaks, chemical spills, exposed electrical wires, etc.) to the School Director for immediate attention.
9. The School Director shall handle all such hazards with appropriate caution and expedience. Proper procedures may require the School Director to notify the appropriate agencies (i.e., the poison control center, the fire department, the power company, etc.)
10. Students and/or employees shall not attempt to repair damaged electrical equipment or exposed wires. Instead, such problems should be reported to the administration.
11. Damaged or dangerous structural conditions shall be reported to the School Director immediately.
12. Students and/or employees should handle all equipment within the manufacturer's specifications. The school will not be responsible for accidents caused by the inappropriate or negligent use of any of its equipment.
13. Students and/or employees shall not be permitted to use unauthorized equipment. The school will not accept liability for accidents involving unapproved equipment.

Campus Safety and Security Policy

14. Students and/or employees with unusual or serious health conditions are encouraged to report such conditions upon admission or employment. Arrangements must be made with his or her physician for appropriate preventative measures. All such conditions will be kept confidential, but the nature of any reasonable accommodation may require certain school officials to be notified to implement approved reasonable accommodations.
15. Employees shall be required to attend a workshop on first-aid care. The workshop will be organized by the administration and will involve accepted professional organizations.

SECURITY AND ACCESS TO CAMPUS FACILITIES:

Only authorized individuals are permitted on the school premises, which includes students, staff, and clinic classroom guests. Individuals who are not a part of the school or receiving a guest service will be considered trespassing and will be prosecuted. All students and staff have name badges that clearly identify who they are and their role. Clinic classroom guests are permitted in the building; however, they must at all times be escorted by either a student or staff member and are limited to the clinic classroom and restroom facilities.

Maintenance personnel wear identification badges and have access during normal school hours and in the evening to clean the school or conduct maintenance of the facility. All non-staff service providers must check in at the service desk and have a badge clearly indicating their purpose on school premises.

Paul Mitchell the School Sarasota maintains its campus facilities in a manner that minimizes hazardous and unsafe conditions. Security considerations that are used in the maintenance of campus facilities include, but are not limited to:

- Parking lots and pathways are illuminated.
- Trees and shrubberies are trimmed away from the walkway and buildings.
- The school works closely with the facilities management to address burned out lights promptly as well as malfunctioning door locks or other physical conditions that are designed to enhance security.

CRIMINAL, ACCIDENT, AND OTHER EMERGENCY REPORTING PROCEDURES:

Crime prevention is the responsibility of everyone on campus. The school does not have individual campus security. All crimes are reported to the local police department for investigation and action. We encourage all students and employees to timely report all crimes to Shaun Chiodo shaunc@sarasota.paulmitchell.edu, the School Director, who will promptly contact the local authorities to address the issue. Victims and witnesses are encouraged to report crimes, but it is solely on a voluntary basis. If you need to seek professional help after having been a victim of a crime, contact the following counseling center:

Safe Place & Rape Crisis Center

2139 Main St

941-365-1976

1. In the event of a burglary or robbery:
 - a. Remain calm and agreeable with the culprit(s).
 - b. Do **not** attempt any heroic measures.
 - c. Report all burglaries to the local police.
 - d. When reporting a burglary or robbery:
 1. Indicate the name of the institution.

Campus Safety and Security Policy

2. Indicate your name.
 3. Indicate the date and time of the incident.
 4. Indicate any injuries if known.
 5. Indicate the number of suspects involved.
 6. Indicate any descriptive information.
2. In the event of larceny:
- a. Remain calm and agreeable with those involved.
 - b. Do not attempt to determine if any person is innocent or guilty.
 - c. Report all larceny to the local police department for investigation.
 1. Indicate the name and address of the school.
 2. Indicate your name.
 3. Indicate the date and time of the incident.
 4. Indicate any injuries if known.
 5. Indicate the name(s) of those involved or any witnesses.
 6. Indicate any descriptive information.
3. In the event of an accident:
- a. Report the event to the School Director or manager on duty.
 - b. The School Director or manager on duty will do the following:
 1. Determine if emergency help is needed. If so, he or she will call the appropriate agency.
 2. Complete an accident report. Include the cause, the name(s) of those involved, the date, the time, the circumstances, and the explanation of any witnesses.
 3. Report all information to the management.
 4. If necessary, notify parents and family of the victim(s).
4. In the event of a general emergency within the school's premises, please notify the school's administration immediately and remain calm. The school personnel are trained in emergency response and evacuation procedures. The School Director will determine whether a significant emergency exists by evaluating the situation and consulting with local police authorities. ***If the School Director is not available, contact the Education Leader. If the Education Leader is not available, contact the Future Professional Advisor. If the Future Professional Advisor is not available, contact the Financial Aid Leader, Admissions Leader, or Operations Leader. If any of those individuals are not available, please contact a Learning Leader.***

If a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or staff occurring on campus exists in which students and staff are in danger, an immediate announcement will be made via Facebook by the School Director who will notify the student body and staff of the emergency and the steps to follow. The safety of our students and staff is of the utmost importance to us; if in the judgment of the police, it is better to postpone making the announcement in order to assist a victim, or to contain, respond to, or otherwise mitigate the emergency, we will do so until it is determined to be safe. Police authorities will be contacted for assistance. Do not exit the building unless you have been directly instructed to do so. It may be safer to stay in the school premises in a lockdown mode. Please listen to all announcements from the School Director and follow the directions given over the intercom; remain calm. The staff will direct you where to go in the event of an emergency in order to ensure your safety.

Campus Safety and Security Policy

The school will review its evacuation plans and procedures during the orientation on the first day of class or hire, as well as yearly with the student body and staff. The school will also conduct announced emergency response and evacuation tests annually in order for the staff and students to clearly understand the procedures.

Students and staff are expected to be present on those days. Each test will be documented in the school's records as to the date, time, and whether it was an announced or unannounced test.

In the last reporting period the school conducted 1 announced and 0 unannounced emergency response and evacuation tests in order to ensure that students and staff are aware of the procedures to be used in case of a real emergency.

The test will be conducted by the School Director with the assistance of the school's staff in a minimum of once per calendar year. The tests will be documented in the school's permanent record and will include an indication of whether the test was announced or unannounced, the date, the time, and the duration of the test.

EMERGENCY PROCEDURES

In an emergency, evacuation of the school should proceed as rapidly and safely as possible. The plan accounts for two scenarios of evacuation, which are:

1. In-place evacuation: keeping students and staff members in place, but securing the location for the emergency at hand.
2. On-site evacuation: movement of students and staff members out of the building affected and relocation to another area near the school.

FIRE

1. Evacuate the area of the fire. (Always stay low as smoke and heated gasses collect near the ceiling first.)
2. Activate the fire alarm (if so equipped).
3. Call 911, indicating the need for assistance from the fire department and law enforcement. Other communication networks should be identified and utilized in the event that the fire has caused the telephone system to become out of order.
4. Evaluate the situation; determine quickly, if possible, the size, nature, and location of the fire within the facility.
5. Upon the arrival of the fire department, the School Director shall establish contact with the senior fire department official and coordinate subsequent activities with him or her.
6. Make certain that all students and staff members are accounted for and safe. Move to another location as required. A fire deemed in any way to be a threat to the safety of the students or the staff calls for evacuation to the outside area, away from the building.
7. Any of the steps above may be done simultaneously as the number of staff members on duty permits. The decision not to follow any of these steps is justifiable only when there is certainty that there is no imminent danger.
8. If the fire is small, any of the facility's fire extinguishers may be used to extinguish it, if the staff member has received proper training. Although there should be no hesitation regarding the use of fire extinguishers, the fighting of any fire by staff members should be undertaken only if there is no imminent danger.

Campus Safety and Security Policy

ILLNESS OR INJURY

A. MINOR

1. Treat with medical supplies on hand.
2. Evaluate periodically to see if further medical attention is required.

B. MAJOR

1. Employ first aid techniques as trained, if needed.
2. Contact 911 if immediate medical attention is required.
3. If an illness or an injury requires a doctor's care, but emergency services are not required, the staff members should then arrange for transportation to the emergency room, clinic, or hospital.

BOMB THREATS

1. Any bomb threat should be treated as real until proven otherwise.
2. Unidentified or suspicious objects should be reported to the authorities.
3. Evacuation should be to an outdoor area as far from the building as safely possible. The area to be evacuated should be searched quickly before evacuation. In certain circumstances, based on the location of the threat, the school may be directed to shelter in place by first responders and/or law enforcement. All directions of first responders/law enforcement are to be followed, including the direction to shelter in place.
4. Upon arrival of law enforcement authorities, the facility director, or designee, will assist with the search (i.e., unlocking doors, identifying strange or suspicious objects, etc.)
5. The appropriate authorities should be consulted prior to reentry into the building.

UTILITIES AND MAINTENANCE EMERGENCIES

A. GAS LEAK

1. If any staff member or student smells gas, act quickly.
2. Open windows immediately.
3. Call 911 and report the possible gas leak.
4. Do not turn any electrical switches on **OR** off. Eliminate all flames.
5. Check all gas taps and turn them off.
6. If necessary, turn off the gas main. The shutoff valve is next to the meter.
7. If the gas odor remains strong, evacuate the area immediately.
8. Do not return to the building until the fire department announces it is safe.

EMERGENCY EVACUATION

In the event of a fire, bomb threat, active shooter, electrical, chemical, or other emergency that would require the evacuation of the building, all staff members should adhere to the following:

1. Call 911, indicating the need for assistance from the local fire department and law enforcement.
2. Make certain all students and staff members are accounted for and are safe.
3. Evacuate all students and staff members to an area as far from the building as safely practical.
 - a. Adhere to predetermined evacuation routes, if possible; however, do not hesitate to adjust these routes to avoid dangerous areas.

Campus Safety and Security Policy

- b. All students and staff members with special needs are to be assisted as needed.
 - c. In certain circumstances, based on the location of the threat, the school may be directed to shelter in place by first responders and/or law enforcement. All directions of first responders/law enforcement are to be followed, including the direction to shelter in place.
4. Conduct a second head count for students and staff members.
 5. Notify the School Director as soon as possible.
 6. Do not approach or reenter the building until consultation with the proper authorities.

TORNADO/SEVERE WEATHER WATCHES AND WARNING PROCEDURES

1. The safe place designated by the School Director is the Core Room.
 - a. All students and staff will be moved to the designated location.
 - b. Maintain flashlight and voice contact among staff members at all times.

Make sure to conduct a head count before moving to a safe place, after arriving at a safe place, and after leaving the designated area.

2. After there is absolute certainty that the storm has passed:
 - a. The staff members should conduct a head count.
 - b. Provide any necessary first aid and call 911 for any necessary response agencies.
 - c. Check the entire building for any damages such as fire, water, or structural.
 - d. Turn on and test utilities.
3. Notify the School Director as soon as possible with an update of conditions.
4. Notify any agents that services are needed.

The school encourages pastoral counselors and professional counselors, in instances where the student may need assistance in dealing with a particular situation, when appropriate. To avail yourself of this service, please contact Shaun Chiodo shaunc@sarasota.paulmitchell.edu, the School Director, for assistance in obtaining help. We encourage students who may have been the victim of a crime to seek help. The counseling sessions are voluntary and confidential for the basis of inclusion in the annual disclosure of crime statistics.

PASTORAL AND PROFESSIONAL COUNSELORS

The school encourages the use of pastoral counselors and professional counselors in instances where the student may need assistance in dealing with a particular situation, when appropriate ; however, the school does not employ any individuals in the role of a pastoral or professional counselor and as such, no school employee is a confidential resource operating in this capacity for Clery Act purposes.

To avail yourself of this service, please contact Shaun Chiodo shaunc@sarasota.paulmitchell.edu, the School Director, for assistance in obtaining help. We encourage students who may have been the victim of a crime to seek help. Referrals to counseling sessions are voluntary and matters disclosed are confidential for the basis of inclusion in the annual disclosure of crime statistics, as they are not school employees.

Campus Safety and Security Policy

In addition to community-based resources, the school has a Student Wellness Program through a company called BPA Health. One of the resources offered through that wellness program is access to mental health professionals and counseling resources. As they are not employees of the school, they are not CSAs for Clery Act purposes and are not required to report crimes for inclusion in the annual disclosure of crime statistics.

To access this resource, please go to:

CIVIL DEMONSTRATIONS AND/OR DISTURBANCES

This action plan is intended to assist Paul Mitchell the School Sarasota team members, Future Professionals, and guests in preparing for and responding to civil demonstrations and/or disturbances.

Definitions

Civil demonstrations or protests may involve organized or ad hoc groups who have a difference of opinion with a governing body regarding a variety of issues.

Civil disturbance is an activity arising from a mass act of civil disobedience in which the participants can become hostile toward authority, and authorities incur difficulties in maintaining public safety and order over the disorderly crowd.

Action Plan

Most demonstrations are peaceful, and people not involved should attempt to carry on business as usual. Avoid provoking or obstructing demonstrators.

Planned or Unplanned Demonstrations

Demonstrations within 20 miles of the campus will be monitored closely. If necessary, the school may make the decision to close the facility for the day; release the staff and students early or delay the start of work/school; and/or have students and staff shelter in place.

If the demonstration turns confrontational or heated and starts to escalate, please call the police department at 941-263-6773 and provide the following information:

- The name of the group, if known
- The exact location
- The size of the group
- Weapons involved
- What is the group doing?
 - Damaging property
 - Making threats
 - Holding signs
- Do they have shouting/chanting amplification devices?

General safety guidance:

- Remain calm
- Follow directions of authorities

Campus Safety and Security Policy

- Do not become a spectator; remove yourself from the area
- Lock and avoid all windows and doors
- Close all blinds to prevent flying glass/debris
- Do not argue or enter into the debate with demonstrators
- Do not commit or become involved in any crimes

STUDENT RIGHT TO KNOW POLICY:

All criminal activity and accidents that occur on the school premises must be reported to the School Director who must keep a confidential file on the circumstances surrounding each incident. The School Director must make the information available to the employees and students, although he or she will keep personal information, such as names, confidential. The school may withhold information if there is clear and convincing evidence that the release of the Information would jeopardize an ongoing criminal investigation or the safety of an individual; cause a suspect to flee or evade detection; or result in the destruction of evidence. The school will only withhold that information that would cause the adverse effect described. The school will disclose any information withheld once the adverse effect described is no longer likely to occur. The School Director shall use the following procedures for informing students and employees of criminal activity and accidents:

1. Each week during weekly announcements, a general account of any criminal activity that may have occurred will be given.
2. Each week, a general account of any criminal incident and/or accident will be available for review in the Director's office. Confidential information will **not** be available.
3. A confidential file will be kept that describes each accident and criminal incident in detail. The file must include dates, times, names, extenuating circumstances, agencies notified, etc.
4. During the announcements, emphasis **will** be placed on accident and crime prevention.
5. Statistics regarding the incidence of rape, burglary, drug violations, motor vehicle theft, murder, and simple or aggravated assaults that occurred within the institution will be available to any and all students and/or employees upon request.
6. Statistics concerning the number of arrests for on-campus crimes of murder, forcible and non-forcible sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, liquor law violations, drug law violations, illegal weapon possessions, arson, negligent manslaughter, and non-negligent manslaughter during the calendar years of 2020, 2021, and 2022 are listed.
7. The school will identify where on campus the crime occurred, such as in the school building, in front of the school, or in the parking lot.
8. The crime log for the most recent 60-day period is open to public inspection during normal business hours. Any portion of the log older than sixty days is available within two business days of a request for public inspection.

Campus Safety and Security Policy

A school's **campus** is defined as "(i) Any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institution's educational purposes, including residence halls; and (ii) any building or property that is within or reasonably contiguous to the area identified in (i) of this definition, that is owned by the institution but controlled by another person, is frequently used by students, and supports institutional purposes.

Public Property is defined as "all public property that is within the same reasonably contiguous geographic area of the institution, such as a sidewalk, a street, other thoroughfare, or parking facility, and is adjacent to a facility owned or controlled by the institution if the facility is used by the institution in direct support of, or in a manner related to the institution's educational purposes."

Type of Crime on Campus	Number of Occurrences			Number of Arrests		
	2020	2021	2022	2020	2021	2022
Murder	0	0	0	0	0	0
Criminal Homicide	0	0	0	0	0	0
Sex Offenses: Rape	0	0	0	0	0	0
Sex Offenses: Fondling	0	0	0	0	0	0
Sex Offenses: Incest	0	0	0	0	0	0
Sex Offenses: Statutory Rape	0	0	0	0	0	0
Robbery	0	0	0	0	0	0
Simple or Aggravated Assault	0	0	0	0	0	0
Burglary	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0
Arson	0	0	0	0	0	0
Liquor Law Violations	0	0	0	0	0	0
Drug Law Violations	0	0	0	0	0	0
Illegal Weapons Possessions	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0
Murder and Non-Negligent Manslaughter	0	0	0	0	0	0
Hate Crimes	0	0	0	0	0	0
Hate Crimes based on Race*	0	0	0	0	0	0
Hate Crimes based on Gender*	0	0	0	0	0	0
Hate Crimes based on Religion*	0	0	0	0	0	0
Hate Crimes based on National Origin*	0	0	0	0	0	0
Hate Crimes based on Gender Identity*	0	0	0	0	0	0
Hate Crimes based on Sexual Orientation*	0	0	0	0	0	0
Hate Crimes based on Ethnicity*	0	0	0	0	0	0
Hate Crimes based on Disability*	0	0	0	0	0	0
Hate Crimes based on Larceny**	0	0	0	0	0	0
Hate Crimes based on Theft (except motor vehicle)**	0	0	0	0	0	0
Hate Crimes based on Simple Assault***	0	0	0	0	0	0

Campus Safety and Security Policy

Type of Crime on <i>Campus Continued</i>	Number of Occurrences			Number of Arrests		
	2020	2021	2022	2020	2021	2022
Hate Crimes based on Intimidation***	0	0	0	0	0	0
Hate Crimes based on Destruction to Property****	0	0	0	0	0	0
Hate Crimes based on Damage to Property****	0	0	0	0	0	0
Hate Crimes based on Vandalism****	0	0	0	0	0	0
Hate Crime: Any Other Crime Involving Bodily Injury	0	0	0	0	0	0

The crimes listed above occurred on the following areas of campus:

Type of Crime on <i>Public Property</i>	Number of Occurrences			Number of Arrests		
	2020	2021	2022	2020	2021	2022
Murder	0	0	0	0	0	0
Criminal Homicide	0	0	0	0	0	0
Sex Offenses: Rape	0	0	0	0	0	0
Sex Offenses: Fondling	0	0	0	0	0	0
Sex Offenses: Incest	0	0	0	0	0	0
Sex Offenses: Statutory Rape	0	0	0	0	0	0
Robbery	0	0	0	0	0	0
Simple or Aggravated Assault	0	0	0	0	0	0
Burglary	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0
Arson	0	0	0	0	0	0
Liquor Law Violations	0	0	0	0	0	0
Drug Law Violations	0	0	0	0	0	0
Illegal Weapons Possessions	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0
Murder and Non-Negligent Manslaughter	0	0	0	0	0	0
Hate Crimes	0	0	0	0	0	0
Hate Crimes based on Race*	0	0	0	0	0	0
Hate Crimes based on Gender*	0	0	0	0	0	0
Hate Crimes based on Religion*	0	0	0	0	0	0
Hate Crimes based on National Origin*	0	0	0	0	0	0
Hate Crimes based on Gender Identity*	0	0	0	0	0	0
Hate Crimes based on Sexual Orientation*	0	0	0	0	0	0
Hate Crimes based on Ethnicity*	0	0	0	0	0	0
Hate Crimes based on Disability*	0	0	0	0	0	0
Hate Crimes based on Larceny**	0	0	0	0	0	0
Hate Crimes based on Theft (except motor vehicle)**	0	0	0	0	0	0

Campus Safety and Security Policy

Type of Crime on <i>Public Property</i> Continued	Number of Occurrences			Number of Arrests		
	2020	2021	2022	2020	2021	2022
Hate Crimes based on Simple Assault***	0	0	0	0	0	0
Hate Crimes based on Intimidation***	0	0	0	0	0	0
Hate Crimes based on Destruction to Property****	0	0	0	0	0	0
Hate Crimes based on Damage to Property****	0	0	0	0	0	0
Hate Crimes based on Vandalism****	0	0	0	0	0	0
Hate Crime: Any Other Crime Involving Bodily Injury	0	0	0	0	0	0

The crimes listed above occurred on the following areas of campus:

Public Property Hate Crime Arrests and Disciplinary Referrals

	Number of Occurrences			Number of Arrests		
	2020	2021	2022	2020	2021	2022
Hate Crimes	0	0	0	0	0	0
Hate Crimes based on Race*	0	0	0	0	0	0
Hate Crimes based on Gender*	0	0	0	0	0	0
Hate Crimes based on Religion*	0	0	0	0	0	0
Hate Crimes based on National Origin*	0	0	0	0	0	0
Hate Crimes based on Gender Identity*	0	0	0	0	0	0
Hate Crimes based on Sexual Orientation*	0	0	0	0	0	0
Hate Crimes based on Ethnicity*	0	0	0	0	0	0
Hate Crimes based on Disability*	0	0	0	0	0	0
Hate Crimes based on Larceny**	0	0	0	0	0	0
Hate Crimes based on Theft (except motor vehicle)**	0	0	0	0	0	0
Hate Crimes based on Simple Assault***	0	0	0	0	0	0
Hate Crimes based on Intimidation***	0	0	0	0	0	0
Hate Crimes based on Destruction to Property****	0	0	0	0	0	0
Hate Crimes based on Damage to Property****	0	0	0	0	0	0
Hate Crimes based on Vandalism****	0	0	0	0	0	0
Hate Crimes: Any other crime involving bodily injury	0	0	0	0	0	0

Campus Safety and Security Policy

Public Property Hate Crime Arrests and Disciplinary Referrals

The crimes listed above occurred on the following areas of campus:

On Campus Hate Crime Arrests and Disciplinary Referrals

	Number of Occurrences			Number of Arrests		
	2020	2021	2022	2020	2021	2022
Hate Crimes	0	0	0	0	0	0
Hate Crimes based on Race*	0	0	0	0	0	0
Hate Crimes based on Gender*	0	0	0	0	0	0
Hate Crimes based on Religion*	0	0	0	0	0	0
Hate Crimes based on National Origin*	0	0	0	0	0	0
Hate Crimes based on Gender Identity*	0	0	0	0	0	0
Hate Crimes based on Sexual Orientation*	0	0	0	0	0	0
Hate Crimes based on Ethnicity*	0	0	0	0	0	0
Hate Crimes based on Disability*	0	0	0	0	0	0
Hate Crimes based on Larceny**	0	0	0	0	0	0
Hate Crimes based on Theft (except motor vehicle)**	0	0	0	0	0	0
Hate Crimes based on Simple Assault***	0	0	0	0	0	0
Hate Crimes based on Intimidation***	0	0	0	0	0	0
Hate Crimes based on Destruction to Property****	0	0	0	0	0	0
Hate Crimes based on Damage to Property****	0	0	0	0	0	0
Hate Crimes based on Vandalism****	0	0	0	0	0	0
Hate Crimes: Any other crime involving bodily injury	0	0	0	0	0	0

The crimes listed above occurred on the following areas of campus:

Campus Safety and Security Policy

Clery Act Reporting allows a school not to include (or may remove) a reported crime from its statistics when sworn or commissioned law enforcement personnel have fully investigated the reported crime and have made a formal determination that the crime report is false or baseless and, therefore, “unfounded.” In this case a school must report to the Department and disclose in their Annual Security Report statistics that include the total number of crime reports that were “unfounded” and subsequently withheld from its crime statistics during each of the three most recently completed calendar years. Any crimes listed as unfounded have been identified below, indicating the year the crime was determined to be unfounded and the type of crime.

NONE

When listing crimes committed on the school campus, we will use the FBI’s UCR program and the Hierarchy Rule when more than one offense was committed during a single incident. If arson is committed, the school will always record the arson in its statistics, regardless of whether or not it occurs in the same incident as another crime. If rape, fondling, incest, or statutory rape occurs in the same incident as murder, the school will record both the sex offense and the murder in its statistics. The school will also compile the crime statistics for murder, and non-negligent manslaughter, negligent manslaughter, rape, robbery, aggravated assault, burglary, motor vehicle theft, arson, liquor law violations, drug law violations, and illegal weapons possession using the definitions of those crimes from the Summary Reporting System User Manual from the FBI’s UCR Program.

*The school will separately report any hate crimes by category of prejudice and by type of crime, if any are reported during the reporting period.

**The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another. Attempted larcenies are included.

***To unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack.

****To willfully or maliciously destroy, damage, deface, or otherwise injure real or personal property without the consent of the owner or the person having custody or control of it.

An incident must meet three conditions to be classified as a burglary. First, there must be evidence of unlawful entry (trespass). Both forcible entry and unlawful entry — no force are counted. Second, the unlawful entry must occur within a structure, which is defined as having four walls, a roof, and a door. Finally, the unlawful entry into a structure must show evidence that the entry was made in order to commit a felony or theft. If the intent was not to commit a felony or theft, or if the intent cannot be determined, the proper classification is larceny.

The following number of students was referred to campus disciplinary action for the following violations:

Violations on Campus	Number of Incidents		
	2020	2021	2022
Liquor Law Violations	0	0	0
Drug Law Violations	0	0	0
Illegal Weapons Possession	0	0	0

Campus Safety and Security Policy

Violations on Public Property	Number of Incidents		
	2020	2021	2022
Liquor Law Violations	0	0	0
Drug Law Violations	0	0	0
Illegal Weapons Possession	0	0	0

Violations on Non-Campus Buildings and Property	Number of Incidents		
	2020	2021	2022
Liquor Law Violations	0	0	0
Drug Law Violations	0	0	0
Illegal Weapons Possession	0	0	0

On-Campus Arrests and Disciplinary Referrals	Number of Incidents		
	2020	2021	2022
Liquor Law Violations	0	0	0
Drug Law Violations	0	0	0
Illegal Weapons Possession	0	0	0

The following Drug-Free Workplace Policy is to notify all employees and students that pursuant to the Federal Drug-Free Workplace Act of 1988 (Public Law 101-690) and [California Drug-Free Workplace Act of 1990], and Drug-Free Schools and Campuses Act of 1989 (EDGAR Part 86 Subpart B), prohibits being under the influence, the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in the workplace, on school property, or as part of any school activity. Paul Mitchell the School Sarasota similarly prohibits being under the influence, the unlawful use, possession, and distribution of alcohol in the workplace, on school property, or as part of any school activity, as well as any other unlawful conduct involving alcohol.

The drug-free workplace consists of all locations where Paul Mitchell the School Sarasota does business. This includes, but is not limited to, all lecture classrooms, parking lots, all administrative offices, corridors, storage rooms, and any space added to the school or school property.

Health Risks:

The abuse of narcotics, depressants, stimulants, hallucinogens, or alcohol can cause serious detriment to a person’s health. The health risks associated with the misuse of the previously mentioned drugs vary, but may include, and are not limited to: convulsions, coma, paralysis, irreversible brain damage, tremors, fatigue, paranoia, insomnia, and possible death. Drug and alcohol abuse is extremely harmful to a person’s health and interferes with productivity and alertness. Working while under the influence of drugs or alcohol could be a danger to the individual under the influence, coworkers, and students. Described below are additional dangers and symptoms relative to use and/or abuse.

Marijuana

Commonly known as “pot,” marijuana is a plant with the botanical name of cannabis sativa. Pot is almost always smoked but can be ingested. Use causes the central nervous system to become disorganized and confused. Most users experience an increase in heart rate, reddening of eyes, and dryness of the throat and mouth.

Studies have proven that marijuana’s mental effects include temporary impairment of short-term memory and an altered sense of time. It also reduces the ability to perform tasks requiring concentration, swift reactions, and coordination. Feelings of euphoria, relaxation, and bouts of exaggerated laughter are also commonly reported.

Campus Safety and Security Policy

Smoking “pot” may cause: brain chemical changes, an altered reality, physically damaged lungs, emphysema, chronic bronchitis, lung cancer, a weakened immune system, damage to sperm in males, irregular menstrual cycles in females, and reduced fertility and sex drive.

Regardless whether or not the state allows the use of marijuana or medical marijuana, at the federal level, marijuana remains classified as a Schedule I substance under the Controlled Substances Act, in which Schedule I substances are considered to have a high potential for dependency and no accepted medical use, making distribution or use of marijuana a federal offense. Therefore, regardless of the circumstance, marijuana cannot be brought to or used on the school’s campus.

Cocaine/Crack

Cocaine is a stimulant drug, which is derived from the coca plant. Street cocaine is available in the form of a powder or a “rock” of crack and is most commonly inhaled or smoked. Cocaine increases the heart rate and blood pressure and is highly addictive.

Crack is a form of smokable cocaine named for the popping sound it makes when burned. It is a mixture of cocaine, baking soda, and water. It is 5–10 times more potent than cocaine and is extremely harmful. It has been reported that addiction can occur with as few as two “hits.” Some symptoms of cocaine/crack abuse are: personality changes; unexplained weight loss; excess sniffing and coughing; insomnia; depression; irritability; neglect of responsibility toward work, school, family, and friends; and panic attacks.

Alcohol

In small amounts, alcohol has a tranquilizing effect on most people, although it appears to stimulate others. Alcohol first acts on those parts of the brain that affect self-control and other learned behaviors; lowered self-control can lead to aggressive behavior. Alcohol use can also cause dehydration, coordination problems, and blurred vision.

In large amounts, alcohol can dull sensation and impair muscular coordination, memory, and judgment. Taken in larger amounts over a long period of time, alcohol can damage the liver, heart, and brain, and cause numerous other health and medical issues.

When anyone under age 21 drinks alcohol, it is considered underage drinking. Underage drinking is against the law, except in special cases, such as when it is part of a religious ceremony. Underage drinking is also dangerous. It can harm the mind and body of a growing adolescent in ways many people don’t realize. If caught by the police, you may be arrested, lose your driver’s license, or be required to attend an alcohol awareness program. If a student is caught drinking on the school’s campus or at a school-sponsored event, the student will be terminated from school.

Hallucinogens

Hallucinogens are also known as psychedelics. The effects vary; a user’s reactions can vary by occasion. Most users are affected by changes in time and space perception, delusions, and hallucinations. The effects may be mild or overwhelming, depending on the dose and quantity of the drug.

Physical reactions range from minor changes, such as dilated pupils or an increase in temperature and heartbeat, to major changes, such as tumors. High doses can significantly alter the state of consciousness. After taking a hallucinogenic drug, the user loses control of thought processes. Although many perceptions are benign, others may cause panic or may make the user believe he or she cannot be harmed. Such delusions can be dangerous.

Campus Safety and Security Policy

Heroin

Heroin is a narcotic, which relieves pain and induces sleep. Commonly known as “junk” or “smack,” heroin is a highly addictive depressant and has been attributed as the cause of many deaths. Symptoms include “pin-point pupils”; drowsiness, lethargy, and slurred speech; and an inability to concentrate. Related medications used to treat pain include oxycontin and oxycodone, methadone, and codeine. The abuse of painkillers ranks second only to the abuse of marijuana in the United States. Heroin users experience a higher rate of infectious disease due to a weakened immune system and sharing contaminated needles. Children can be born addicted or can become addicted as a result of heroin in the mother’s breast milk.

Crystal Methamphetamine

Crystal methamphetamine is a colorless, odorless, powerful, and highly addictive synthetic (man-made) stimulant. Crystal methamphetamine typically resembles small fragments of glass or shiny blue-white “rocks” of various sizes. Like powdered methamphetamine, crystal methamphetamine produces long-lasting euphoric effects. Crystal methamphetamine, however, typically has a higher purity level and may produce even longer-lasting and more intense physiological effects than the powdered form of the drug.

Crystal methamphetamine use is associated with numerous serious physical problems. The drug can cause rapid heart rate, increased blood pressure, and damage to the small blood vessels in the brain, which can lead to stroke. Chronic use of the drug can result in inflammation of the heart lining. Overdoses can cause hyperthermia (elevated body temperature), convulsions, and death.

Crystal methamphetamine users may experience episodes of violent behavior, paranoia, anxiety, confusion, and insomnia. The drug can produce psychotic symptoms that persist for months or years after an individual has stopped using the drug.

Crystal methamphetamine users who inject the drug expose themselves to additional risks, including contracting HIV (human immunodeficiency virus). Methamphetamine users also risk scarred or collapsed veins, infections of the heart lining and valves, abscesses, pneumonia, tuberculosis, and liver or kidney disease.

Depressants

Depressants are highly addictive; they are usually known as “downers.” A user may be drowsy and lethargic, suffer from memory loss, and have slurred speech. Many lawful drugs that have characteristics of depressants are from the family of drugs called barbiturates. More serious effects of the abuse of downers are liver damage, paradoxical anxiety and excited rage, coma, and death.

Ecstasy (MDMA)

Also known as XTC, X, and E, Ecstasy is a mind-altering drug with hallucinogenic and speed-like side effects. Often used at raves, it is taken to promote loss of inhibition, excitability, euphoria, energy, and sexual stimulation. Ecstasy increases the amounts of serotonin in the user’s brain, which causes increased energy and euphoria; it also contains anti-coagulative properties, which can cause the user to bleed to death if injured. Ecstasy can also cause serious brain damage in a short time. Side effects of ecstasy include: depression, increased heart rate and blood pressure, muscle tension, nausea, blurred vision, faintness, chills, brain damage, organ damage, and death. Similar “designer drugs” include MDEA and MDA (also known as “Adam” and “Eve”).

Ritalin

Methylphenidate (Ritalin) is a medication prescribed for individuals (usually children) who have an abnormally high level of activity or attention-deficit hyperactivity disorder (ADHD). It contains amphetamines and can be abused as a stimulant by those for whom it is not prescribed. When abused, the tablets are either taken orally or crushed and snorted. Some abusers dissolve the tablets in water and inject the mixture — complications can arise from injection as insoluble fillers in the tablets can block small blood vessels.

Campus Safety and Security Policy

GHB

Gamma-hydroxybutyrate is an intoxicating chemical with medical, recreational, and potentially dangerous uses. Its use is illegal for any purpose in the United States. Nicknamed the “date rape drug,” it is a clear liquid often mixed in drinks to promote relaxation or increased sociability. When taken, side effects can include: drowsiness, dizziness, vomiting, amnesia, decreased motor skills, slurring of speech, unrouseable sleep (coma), and death. GHB was used as a dietary supplement until banned by the FDA. GHB is now illegal in the United States. Common slang names for GHB are: G, Liquid X, GBH, Gamma-oh, Blue Verve, Grievous Bodily Harm, Goop, and EZLay.

Drug Conviction Notification and Imposed Sanctions:

- Any employee or student must notify Paul Mitchell the School Sarasota of any criminal drug statute conviction for a violation occurring in the workplace no later than **five** days after such a conviction.
- Within 30 days after receiving notice of an employee or student conviction, will impose corrective measures on the employee or student convicted of drug abuse violations in the workplace by:
 - ❶ Taking appropriate action against the employee or student up to and including expulsion or termination of employment and referral for prosecution and/or
 - ❷ Requiring such employee or student to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a federal, state, or local health, law enforcement, or other appropriate agency.

Laws Relating to Drug Violations:

Attached is a list of violation codes associated with the unlawful manufacture, distribution, dispensing, possession, or use of any controlled substance. Any employee or student violating any of the described laws of the Health and Safety Code or the Business and Professional Code could be subject to fines and imprisonment.

Where can students go for help?

White Sanes Alcohol & Drug Rehab Sarasota
3202 N Tamiami Trail
Sarasota FL 34234
941-960-7405

Where can staff go for help?

White Sands Alcohol & Drug Rehab Sarasota
3202 N Tamiami Trail
Sarasota FL 34234
941-960-7405

Drug Abuse and Addiction Information and Treatment Centers

- | | |
|--|--------------|
| • Harm Reduction Therapy Clinic | 415-863-4282 |
| • National Institute on Drug Abuse | 301-443-1124 |
| • Alcohol Abuse | 212-870-3400 |
| • Alcoholics Anonymous World Services | 212-870-3400 |
| • National Institute of Alcohol Abuse and Alcoholism | 301-443-3836 |
| • Rapid Detox | 586-558-8798 |
| • Treatment Access Services | 888-558-8798 |
| • Alcoholics Anonymous (AA) | 212-870-3400 |
| • ACOA (Adult Children of Alcoholics) | 310-534-1815 |
| • AL-ANON (Family and Friends of Alcoholics) | 888-425-2666 |
| • The Center for Substance Abuse Treatment and Referral Hotline: | 888-662-4357 |

Paul Mitchell the School Sarasota

has additional referrals you can contact.

Campus Safety and Security Policy

Policy Distribution Procedures:

Paul Mitchell the School Sarasota Drug-Free Workplace Policy will be distributed to all employees and students on an annual basis using the following procedure:

- Students will receive a copy of the Drug-Free Workplace Policy at the time of initial enrollment. The enrollment agreement signed by every student will acknowledge receipt of the Drug-Free Workplace Policy.
- Staff employees will receive a copy of the Drug-Free Workplace Policy with the initial employment agreement. It will be read, and the signature page will be returned with the employment agreement. Annually, the human resources department will be responsible for distributing the policy to current staff employees.

Biennial Review

The school conducts a biennial review of its Drug-Free Workplace Policy to determine the program's effectiveness, any needed changes, the number of drug- and alcohol-related violations and fatalities, and the number and type of sanctions imposed. Contact the School Director to request a copy of the biennial review.

Campus Safety and Security Policy

Federal Trafficking Penalties*

Drug/Schedule	Quantity	Penalties	Quantity	Penalties
Cocaine (Schedule II)	500–4,999 grams mixture	<p>First offense: Not less than five years, and not more than 40 years. If death or serious injury, not less than 20 years or more than life imprisonment. Fine of not more than \$2 million if an individual, \$5 million if not an individual.</p> <p>Second offense: Not less than 10 years, and not more than life imprisonment. If death or serious injury, life imprisonment. Fine of not more than \$4 million if an individual, \$10 million if not an individual.</p>	5 kilograms or more mixture	<p>First offense: Not less than 10 years, and not more than life imprisonment. If death or serious injury, not less than 20 years or more than life imprisonment. Fine of not more than \$4 million if an individual, \$10 million if not an individual.</p> <p>Second offense: Not less than 20 years, and not more than life imprisonment. If death or serious injury, life imprisonment. Fine of not more than \$8 million if an individual, \$20 million if not an individual.</p> <p>Two or more prior offenses: Life imprisonment</p>
Cocaine Base (Schedule II)	28–278 grams mixture		279 grams or more mixture	
Fentanyl (Schedule II)	40–399 grams mixture		400 grams or more mixture	
Fentanyl Analogue (Schedule I)	10–99 grams mixture		100 grams or more mixture	
Heroin (Schedule I)	100–999 grams mixture		1 kilogram or more mixture	
LSD (Schedule I)	1–9 grams mixture		10 grams or more mixture	
Methamphetamine (Schedule II)	5–49 grams pure or 50–499 grams mixture		50 grams or more pure or 500 grams or more mixture	
PCP (Schedule II)	10–99 grams pure or 100–999 grams mixture		100 grams or more pure or 1 kilogram or more mixture	
Penalties				
Other Schedule I and II Drugs (and any drug product containing Gamma Hydroxybutyric Acid)	Any amount	<p>First offense: Not more than 20 years. If death or serious injury, not less than 20 years, or more than life imprisonment. Fine \$1 million if an individual, \$5 million if not an individual.</p> <p>Second offense: Not more than 30 years. If death or serious injury, not less than life imprisonment. Fine \$2 million if an individual, \$10 million if not an individual.</p>		
Flunitrazepam (Schedule IV)	1 gram or more			
Other Schedule III Drugs	Any amount	<p>First offense: Not more than five years. Fine not more than \$250,000 if an individual, \$1 million if not an individual.</p>		
Flunitrazepam (Schedule IV)	30 to 999 milligrams	<p>Second offense: Not more than 10 years. Fine not more than \$500,000 if an individual, \$2 million if not an individual.</p>		
All Other Schedule IV Drugs	Any amount	<p>First offense: Not more than three years. Fine not more than \$250,000 if an individual, \$1 million if not an individual.</p>		
Flunitrazepam (Schedule IV)	Less than 30 milligrams	<p>Second offense: Not more than six years. Fine not more than \$500,000 if an individual, \$2 million if not an individual.</p>		
All Schedule V Drugs	Any amount	<p>First offense: Not more than one year. Fine not more than \$100,000 if an individual, \$250,000 if not an individual.</p> <p>Second offense: Not more than two years. Fine not more than \$200,000 if an individual, \$500,000 if not an individual.</p>		

Campus Safety and Security Policy

Federal Trafficking Penalties — Marijuana*

Drug	Quantity	First Offense	Second Offense
Marijuana	1,000 kilograms or more mixture; or 1,000 or more plants	<ul style="list-style-type: none"> • Not less than 10 years, not more than life imprisonment. • If death or serious injury, not less than 20 years, not more than life imprisonment. • Fine not more than \$4 million if an individual, \$10 million if other than an individual. 	<ul style="list-style-type: none"> • Not less than 20 years, not more than life imprisonment. • If death or serious injury, mandatory life imprisonment. • Fine not more than \$8 million if an individual, \$20 million if other than an individual.
Marijuana	100 kilograms to 999 kilograms mixture; or 100 to 999 plants	<ul style="list-style-type: none"> • Not less than five years, not more than 40 years. • If death or serious injury, not less than 20 years, not more than life imprisonment. • Fine not more than \$2 million if an individual, \$5 million if other than an individual. 	<ul style="list-style-type: none"> • Not less than 10 years, not more than life imprisonment. • If death or serious injury, mandatory life imprisonment. • Fine not more than \$4 million if an individual, \$10 million if other than an individual.
Marijuana	more than 10 kilograms hashish; 50 to 99 kilogram mixture more than 1 kilogram of hashish oil; 50 to 99 plants	<ul style="list-style-type: none"> • Not more than 20 years. • If death or serious injury, not less than 20 years, not more than life imprisonment. • Fine \$1 million if an individual, \$5 million if other than an individual. 	<ul style="list-style-type: none"> • Not more than 30 years. • If death or serious injury, mandatory life imprisonment. • Fine \$2 million if an individual, \$10 million if other than an individual.
Marijuana	1 to 49 plants; less than 50 kilogram mixture	<ul style="list-style-type: none"> • Not more than five years. • Fine not more than \$250,000, \$1 million if other than an individual. 	<ul style="list-style-type: none"> • Not more than 10 years. • Fine \$500,000 if an individual, \$2 million if other than an individual.
Hashish	10 kilograms or less		
Hashish Oil	1 kilogram or less		

*From the U.S. Drug Enforcement Administration

The school monitors and records any criminal activity that takes place at a school event off campus by contacting local policy agencies to ensure that all off-campus activities are conducted in safe and secure facilities. Each of these events is supervised by teachers and staff of the school.

Campus Safety and Security Policy

POLICIES AND PROGRAMS ADDRESSING DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, AND STALKING

This document has been designed to inform all students and employees of the Violence Against Women Act (VAWA), Title IX, and Clery Act and outlines Paul Mitchell the School Sarasota's commitment to the health and safety of its students and employees. Paul Mitchell the School Sarasota prohibits the crimes of domestic violence, dating violence, sexual assault, and stalking (as defined by the Clery Act, VAWA, and Title IX Regulations). The school reaffirms its commitment to maintaining a campus environment that emphasizes the dignity and worth of all members of the school community. The school strictly prohibits any student or staff member from engaging in any crime outlined under the VAWA, Clery Act, and/or Title IX, including the crimes of dating violence, domestic violence, sexual assault, and stalking, and is committed to taking the necessary steps to investigate any allegations of wrongdoing in line with applicable jurisdiction requirements. This annual disclosure document is completed each year by contacting the local police department and/or the building management to compile the statistics used in the report.

The school maintains programs to prevent and address domestic violence, dating violence, sexual assault/misconduct, and stalking. Under the school's Protected Class Nondiscrimination Policy and Procedures and Future Professional Advisory Policy, student conduct sets forth the disciplinary procedures for action in cases of alleged domestic violence, dating violence, sexual assault, and/or stalking. The school's Protected Class Nondiscrimination Policy and Procedure's definition for sexual harassment includes sexual assault, dating violence, domestic violence, and stalking.

The school recognizes that anyone can be impacted by domestic violence, dating violence, sexual assault, and stalking regardless of sex, gender, gender identity, gender expression, and/or sexual orientation. All campus services are available to anyone who experiences these crimes.

Please note that throughout this portion of the report the term, "victim" will be used to refer to anyone who experiences a Clery crime. The school recognizes that each person may use other terms to describe themselves and their experiences.

Retaliation Prohibited

Retaliation is prohibited by school policy (see Protected Class Nondiscrimination Policies and Procedures). The school will not tolerate retaliation in any form against an individual who makes an allegation, files a report, serves as a witness, assists a party to an investigation/adjudication, or participates in related processes. Allegations of retaliation should be reported immediately to the Title IX Coordinator and/or the School Director.

Reporting Domestic Violence, Dating Violence, Sexual Assault, and/or Stalking

Victims or witnesses to a crime on the school premises may report the crime to the School Director/Campus Security Coordinator on a confidential basis for inclusion into the in the annual disclosure of crime statistics. This document explains the institution's policy regarding crime prevention, public safety, and criminal reporting procedures. This document will be provided to all prospective students and staff, as well as be reviewed with all students during orientation and with staff at the time of hire. It is also provided annually on or before October 1 to all currently enrolled students and currently employed staff.

Training and Prevention Programming

The school will provide training in October of each year when the new statistics are available. The training promotes awareness and prevention of rape, acquaintance rape, domestic violence, dating violence, sexual assault, stalking, and the prevention of crime, as well as gives options for reducing the risk of such offenses occurring, the warning signs of abusive behavior, and how to avoid potential attacks. Please read

Campus Safety and Security Policy

this document carefully, and ask questions if you are confused or uncertain. The school's Campus Security Coordinator is Shaun Chiodo shaunc@sarasota.paulmitchell.edu, the School Director.

To conduct the awareness program, we bring in a local law enforcement official and a representative from Sarasota Police Department, the local crisis-center, into the school to provide our students and staff with knowledge, information, and resources to prevent violence, promote safety, and reduce risk by showing how to protect yourself against crime, how to be responsible for your own safety, and how to protect yourself against sexual assault. Paul Mitchell the School Sarasota is committed to making your school a safe place.

The school also provides comprehensive prevention and awareness programming/training through EverFi/Vector Solutions to all Future Professionals upon entry into the program. Staff are also annually trained via EverFi/Vector Solutions.

Some examples of safe and positive options for bystander intervention include:

- Checking in with a friend who looks very intoxicated when leaving a party or event, either alone or with someone else.
- Talking with friends, classmates, teammates, and peers about intimate violence as a serious issue in the community.
- Speaking up to a friend or someone else who says they had sex with someone who was very intoxicated or couldn't consent.
- Expressing discomfort when someone makes a joke about or minimizes sexual or domestic violence or stalking.
- Helping a friend get home safely if they seem very intoxicated.
- Interrupting a conversation when it looks like one person might be making another person feel uncomfortable or unsafe.
- Talking to a friend suspected of being in a relationship that is abusive or harmful to connect them to supportive resources.
- Calling for campus safety and security personnel or law enforcement to intervene in a situation that might be dangerous or unsafe.

Risk reduction refers to options designed to decrease perpetration and bystander inaction and to increase empowerment for victims in order to promote safety and to help individuals and communities address conditions that facilitate violence.

Definition of Consent:

Federal Definition:

Consent is informed, voluntary, and revocable. Consent is an affirmative, unambiguous, and conscious decision by each participant to engage in mutually agreed-upon sexual activity. It must be given without coercion, force, threats, or intimidation. Consent must be ongoing throughout a sexual encounter and can be revoked at any time. Once consent is withdrawn, the sexual activity must stop immediately.

Campus Safety and Security Policy

Local Jurisdiction Definition:

consent as "a clear and unambiguous agreement, expressed outwardly through mutually understandable words or actions, to engage in a particular activity." Consent can be withdrawn by either party at any point. Consent must be voluntarily given and may not be valid if a person is being subjected to actions or behaviors that elicit emotional, psychological, physical, reputational, financial pressure, threat, intimidation, or fear (coercion or force).

Definitions of Domestic Violence, Dating Violence, Sexual Assault (Rape), and Stalking

What is domestic violence

Federal Definition:

The definition of "**domestic violence**" includes felony or misdemeanor crimes of violence committed by:

- a) current or former spouse or intimate partner of the victim,
- b) by a person with whom the victim shares a child in common,
- c) by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner,
- d) by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or
- e) by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

Local Jurisdiction Definition:

"Domestic violence" means the occurrence of any of the following acts by a person that is not an act of self-defense:

- (i) Causing or attempting to cause physical or mental harm to a family or household member.
- (ii) Placing a family or household member in fear of physical or mental harm.
- (iii) Causing or attempting to cause a family or household member to engage in involuntary sexual activity by force, threat of force, or duress.
- (iv) Engaging in activity toward a family or household member that would cause a reasonable person to feel terrorized, frightened, intimidated, threatened, harassed, or molested



Campus Safety and Security Policy

National Domestic Violence Hotline: 1-800-799-7233
www.thehotline.org
Text START to 88788

What is dating violence

Federal Definition:

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 where the existence of such a relationship shall be determined based on a consideration of the following factors: the length of the relationship; the type of relationship; and the frequency of interaction between the persons involved in the relationship.

Local Jurisdiction Definition:

Dating violence is a pattern of assaultive and controlling behaviors that one person uses against another in order to gain or maintain power in the relationship. The abuser intentionally behaves in ways that cause fear, degradation, and humiliation to control the other person. Forms of abuse can be physical, sexual, emotional and psychological.

National Teen Dating Abuse Hotline: 1-800-799-SAFE (7233)
loveisrespect.org or text start to 88788
National Domestic Violence Hotline: 1-800-799-7233
www.thehotline.org
Text START to 88788

Campus Safety and Security Policy

What is sexual assault

Federal Definition:

Sexual assault is defined as an offense classified as a forcible or nonforcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation. Sexual assault occurs when a physical sexual activity is engaged in without the consent of the other person or when the other person is unable to consent to the activity. The activity or conduct may include physical force, violence, threat, or intimidation, ignoring the objections of the other person, causing the other person's intoxication or incapacitation through the use of drugs or alcohol, and taking advantage of the other person's incapacitation (including voluntary intoxication).

Local Jurisdiction Definition:

the legal term used for rape, "sexual assault". Sexual assault is any form of unwanted sexual contact obtained without consent and/or obtained through the use of force, threat of force, intimidation, or coercion.

National Sexual Assault Hotline: 1-800-656-4673
Online chat: online.rainn.org website: rainn.org/resources

What is rape?

Federal Definition:

Rape is defined as penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.

Campus Safety and Security Policy

Local Jurisdiction Definition:

The legal term used for rape, "sexual assault". Sexual assault is any form of unwanted sexual contact obtained without consent and/or obtained through the use of force, threat of force, intimidation, or coercion.

What is stalking?

Federal Definition:

Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for the person's safety or the safety of others; or suffer substantial emotional distress. For the purposes of this definition, *course of conduct* means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveys, threatens, or communicates to or about a person, or interferes with a person's property. *Reasonable person* means a reasonable person under similar circumstances and with similar identities to the victim. *Substantial emotional distress* means significant mental suffering or anguish that may, but does not necessarily lead to professional treatment or counseling. For the purposes of complying with the requirements of this regulation, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

Campus Safety and Security Policy

Local Jurisdiction Definition:

"Stalking" means a willful course of conduct involving repeated or continuing harassment of another individual that would cause a reasonable person to feel terrorized, frightened, intimidated, threatened, harassed, or molested and that actually causes the victim to feel terrorized, frightened, intimidated, threatened, harassed, or molested.

If you feel you are being stalked and in immediate danger, call 911 for assistance.

Procedures for Victims of Dating Violence, Domestic Violence, Sexual Assault (Rape), and Stalking (What to Do If You are a Victim of These Crimes)

There is not a "right" or "wrong" way to respond if you are the victim of dating violence, domestic violence, sexual assault, or stalking. It is important to remember that it is not your fault that you experienced this behavior. The following are options for you to consider, but you are not required to do any of these actions—what you do is up to you.

If you are assisting someone who has experienced dating violence, domestic violence, sexual assault, or stalking, please support their decision-making and do not substitute your judgement for theirs by telling them what to do. Work to assist them in making decisions.

If a student or staff member is a victim of domestic violence, dating violence, sexual assault (rape), and/or stalking, and the school is made aware of the incident, the school will inform the victim that they have the option to notify the appropriate law enforcement authorities, including the local police and for medical assistance. If the victim wants the School Director/Campus Security Coordinator/Title IX Coordinator to notify the authorities, they will call (911) for medical assistance, if needed, and/or to alert the police. The School Director/Campus Security Coordinator/Title IX Coordinator and/or a representative from the police department will guide the victim through the available options and support the victim in their decision, including where applicable, restraining orders, orders for protection, no-contact orders, or similar lawful orders issued by a criminal or civil court.

The school and police strongly advocate that a victim of stalking, domestic violence, dating violence, sexual assault (rape), and/or stalking report the incident in a timely manner.

Campus Safety and Security Policy

While there is not a timeline to file a report, the school encourages complainants and others with information about possible discriminatory misconduct (including domestic violence, dating violence, sexual assault (rape) and/or stalking to report as soon as possible). A delay in reporting may impact the school and/or law enforcement's ability to gather relevant and reliable information or for the school to have jurisdiction over the respondent. Some additional considerations regarding timing of a report include, but are not limited to:

- Time is a critical factor for evidence collection and preservation.
- Filing a police report will ensure that a victim receives the necessary medical treatment and tests, if needed, at no expense to the victim; and
- Reporting to police provides the opportunity for collection of evidence helpful in prosecution, which cannot be obtained later.
- It is important to preserve evidence for the proof of a criminal offense, and if possible, do not disturb the area surrounding the incident.

A student or staff member can file a complaint with the School Director/Campus Security Coordinator/Title IX Coordinator. The complaint should outline all details of the event and include a list of any witnesses or documentation to help support the allegations of domestic violence, dating violence, sexual assault (rape), and/or stalking. The complaint should be filed as soon as possible after the occurrence has taken place.

How to Access Supportive Measures Available for Victims:

Supportive measures are available to the individual who experienced the behavior. It is not necessary for the individual to report the crime to law enforcement or file a formal complaint to access these resources.

School officials will work cooperatively with the victim to assist them in accessing and implementing reasonable supportive measures at the victim's request, or upon determination by the Title IX Coordinator, in certain circumstances.

Supportive measures include but are not limited to access to counseling services in the community, extensions of deadlines or other course related adjustments, leaves of absence, modifications of class schedules to another program, increased security or monitoring of campus spaces, safety planning, referrals to other off campus resources, trainings, mutual no contact directives, and other similar measures.

An example of a possible change to the academic or work schedule could be transferring to a different available program, such as moving from night to day classes (where available) , or from a full-time to a part-time schedule. The school will also help find options related to transportation or resources to address housing issues to accommodate the victim, or any other protective measures (such as how to file for a protective order) that may be deemed necessary. The school will make available to the student a leave of absence or opportunity to drop and reenroll at a later date without incurring any additional charges or penalties. The school's Financial Services Leader is available to meet with the victim to discuss his or her options regarding loan repayment or financial aid options. These, as well as other options will be provided to the alleged victim in writing, regardless of whether or not the victim chooses to report the crime to the police or file a complaint with the school; please notify the School Director/Campus Security Coordinator/Title IX Coordinator in person at Julie Flores of such a request for supportive measures.

To request changes as supportive measures, please contact the Title IX Coordinator at:

Julie Flores

Julief@sarasota.paulmitchell.edu

Campus Safety and Security Policy

To request assistance, you may do so by making a statement about what you experienced and request the supportive measures that you believe would be helpful to remain safe and successful in the school environment. Upon receipt, the Title IX Coordinator will determine if the request is reasonable supportive measures.

How to Seek Medical Attention:

After an incident of domestic violence, dating violence, sexual violence (rape), and in some circumstances stalking, you should consider seeking medical attention as soon as possible to treat injuries, be screened for sexually transmitted diseases, pregnancy, or seek the medical collection of evidence.

Sarasota Memorial Hospital
1700 S Tamiami Trail
Sarasota FL 34239
941-917-9000

Sexual Assault Nurse Examiners ("SANE") are forensic nurses who may be available to conduct a forensic examination. There is no cost to have a Sexual Assault Forensic Examination completed. Completing this examination does not require filing a police report or taking criminal action.

How to Preserve Evidence:

Evidence can include many kinds of information from pictures of injuries, social media posts, text messages, voicemails, emails, or photographs/videos. This type of information may assist in proving a crime occurred, a campus policy was violated, or help obtain an order of protection or other civil remedy.

Sexual Assault

In cases of sexual assault (rape), medical forensic evidence may be collected within 120 hours of the assault by a specially trained SANE (Sexual Assault Nurse Examiner). In Sarasota, you can get a Sexual Assault Forensic Examination by a SANE at:

Safe Place and Rape Crisis Center
941-365-1976

Paying for the exam:

Per Florida Statute 960.28, payment for a victim's initial forensic physical examinations is available to a medical provider who performs an initial forensic physical examination. The provider may not bill a victim or the victim's parent or guardian if the victim is a minor, directly or indirectly for that examination. The Crime Victims Services Office of the Department of Legal Affairs shall pay for medical expenses connected with an initial forensic physical examination of a victim of sexual battery as defined in Chapter 794 or a lewd or lascivious offense as defined in Chapter 800. Such payment shall be made regardless of whether the victim is covered by health or disability insurance and whether the victim participates in the criminal justice system or cooperates with law enforcement. The payment shall be made only out of moneys allocated to the Crime Victims Services Office for the purposes of this section.

Things to consider before a SANE Examination:

If you are interested in or unsure about pursuing charges, you can consent to the collection of evidence at an emergency room. This is commonly referred to as a "rape kit." This is a tool to collect evidence to document the physical injuries and evidence like hairs or possibly DNA that may have been transferred during the assault. It is your choice to have evidence collected. You may agree to some parts of the exam but refuse others or all parts of the kit. By choosing to engage in the evidence collection process does not force you to pursue criminal charges.

Evidence is best preserved by not washing away evidence and by collecting all things present near the assault, like clothing or bedding.

- If possible, do not use the bathroom/toilet, especially if you suspect incapacitation by a drug.
- Avoid cleaning up like showering, changing cloths, brushing hair, smoking, drinking, brushing teeth, or cleaning up the area where the assault occurred.
- If you change clothes, put all of your clothing you were wearing at the time of the assault in a paper bag. It is not recommended to use plastic bags, as they can damage evidence by moisture retention. The hospital will provide you with scrubs or clothing or you can have someone bring you clothing.

Campus Safety and Security Policy

Dating Violence /Domestic Violence/Stalking

It is important to preserve evidence if you experience dating violence, domestic violence, and/or stalking. Seeking medical attention for physical assaults that occur as part of one of these crimes can provide documentation of physical injuries sustained. You can also keep a record of witnesses to the behaviors or people you told about what you were experiencing.

You can take or have a friend take pictures of bruising or physical injuries or property damage. If you choose to make a police report, these pictures can be used in the reporting process.

It is also useful to preserve emails, text messages/online messages, voicemails, written notes, pictures of property damage or other evidence, videos, social media postings, etc. If it is safe to do so, you can keep a record of all incidents in an email account or in a notebook with dates and times and descriptions of the behaviors experienced.

Rights of Victims and School Responsibilities for Orders of Protection, Restraining Orders, or Similarly Situated Lawful Court Orders or Orders Issued by the School

Orders of Protection, also known as restraining orders, are civil court orders that are designed to stop harassing and/or violent behavior by limiting contact by the abuser. The school cannot apply to the court system for this type of court ordered protection. Individuals seeking this type of order must apply directly for services themselves.

The Florida law for Personal Protection Order is available at 741.3
This code sets forth the procedure for requesting the order.

A petition for a risk protection order may be filed by a law enforcement officer or law enforcement agency.

The school may also issue a mutual no contact order when the school has control over both parties. This would be at the request of a party, or if deemed appropriate by the school. If the school receives a report that the mutual no contact order has been violated, the school will initiate appropriate discipline under the Future Professional Advisory process and impose sanctions if a violation is found.

School Response to Reports of Domestic Violence, Dating Violence, Sexual Assault (Rape) and/or Stalking

The school has designated the Title IX Coordinator to oversee the school's compliance with relevant federal, state, and local civil rights laws, including those laws that address domestic violence, dating violence, sexual assault (rape) and stalking. The Title IX Coordinator is responsible for implementing the school's Protected Class Nondiscrimination Policy and Procedures. This policy and procedures set forth how the school will respond to reports of domestic violence, dating violence, sexual assault (rape) and/or stalking.

The school's response to each report will depend on the circumstances and facts of each reported incident.

If an individual is found to be responsible for the reported behavior after following the procedures in the Protected Class Nondiscrimination Policies and Procedures, the school will consider the following in sanctioning and/or corrective actions:

- Frequency and severity of the offense
- History of past behavior that was found to be discriminatory, harassing, and/or retaliatory
- Any other factors relevant to the specific findings.

Campus Safety and Security Policy

If an individual is found responsible under the Protected Class Nondiscrimination Policy and Procedures, including domestic violence, dating violence, sexual assault (rape), stalking, hostile environment harassment, and/or quid pro quo harassment, the responsible individual may be subject to disciplinary action up to and including termination of employment for employees or termination of enrollment for students. The Protected Class Nondiscrimination Policy and Procedures has a complete list of student and employee sanctions.

If a report of domestic violence, dating violence, sexual assault, and/or stalking is reported to the Title IX Coordinator, the school will follow the following procedures (please note that this is not necessarily a linear list and multiple steps may occur concurrently or in a different order):

When an Incident of Domestic Violence, Dating Violence, Sexual Assault and/or Stalking is Reported:

1. The school will work with the complainant to address immediate health and safety needs of the complainant (if relevant).
2. The school will provide the complainant with a written explanation¹ of their rights resources, supports and options, including contact information for the local police, how to apply for a protective order, a copy of the Protected Class Nondiscrimination Policy and Procedures.
3. The school will assist the complainant in contacting the local police if the complainant requests, or if there is an immediate health and safety risk that cannot be addressed solely by school personnel. If the police are called without the complainant wanting to speak with the Police, they are not obligated to speak with the police.
4. The school will provide the complainant with mental health resource referrals in the community.
5. The school will assess and implement supportive measures, if appropriate.
6. If deemed appropriate, the school will “trespass” or disallow the accused party from the school. Note, there are certain circumstances under which this is not possible if the alleged individual is also an enrolled student and/or employee.
7. The school will inform the complainant of timeframes for inquiry, investigation, and/or resolution.
8. The school will inform the complainant of the outcome of any process (investigation/adjudication), including a process that is taken administratively.
9. The school takes seriously its obligation to enforce the non-retaliation provisions and will take immediate and separate action against parties who retaliate against a person for exercising their rights under the Protected Class Nondiscrimination Policy and Procedures and/or for assisting in an investigation.

Descriptions of Hearing Process and Procedures for Reports of Domestic Violence, Dating Violence, Sexual Assault (Rape), and/or Stalking Campus Security

The school has implemented the Protected Class Nondiscrimination Policy and Procedures for the investigation and adjudication of reports of domestic violence, dating violence, sexual assault (rape) and/or stalking. There are jurisdictional requirements, but generally, the policy and procedures apply to employees and students. At times, they may also apply to guests (this is a case-by-case analysis).

The school’s Protected Class Nondiscrimination Policy and Procedures provides for a prompt, fair, and impartial process for investigation and resolution of alleged violations of the school’s policy that prohibits domestic violence, dating violence, sexual assault (rape) and/or stalking.

Where possible, the following is also the practice of the office:

- 1) Provide the parties of timely notice for the meetings where the either or both will be present.
- 2) All parties and officials will have timely and equal access to information used during formal investigations/ processes.

¹In certain circumstances, particularly related to Dating Violence, Domestic Violence and/or Stalking, it may not be safe to provide written explanation of resources in an electronic format to the individual. In this circumstance, the Title IX Coordinator and/or designee will provide a hard copy of the written explanation, but the complainant may decline to take a physical copy or have a copy provided electronically. In this circumstance, if the complainant would like to access the information contained in the written explanation, they may do so at any time by reviewing the hard copy in the Title IX Coordinator’s office.

Campus Safety and Security Policy

- 3) The procedures will not be conducted by an individual with a conflict of interest or bias for any party.
- 4) The procedures will be implemented by individuals who have annual training on Title IX, VAWA, and the Clery Act.
- 5) The parties all have the same opportunities to have an advisor present for the school proceeding. For more information, please see the Protected Class Nondiscrimination Policy and Procedures.
 - a. The school will not limit the choice of advisor for any party for meetings and/or school proceedings.
 - b. If a party does not have an advisor they have chosen and provided, one will be provided for them.
 - c. The parties may be advised at any stage of the process and may be accompanied to any meetings/ hearings with that advisor.
 - d. Please note that the role of an advisor is to provide advice to the party and for cross-examination purposes. The advisor may not speak for the party.
- 6) The parties will be notified simultaneously, in writing, of any initial, interim, and/or final decision related to any formal investigation.
- 7) Where applicable, the parties will be notified simultaneously, in writing, of the procedures for filing an appeal of the outcome. When an appeal is filed, the parties will all be notified simultaneously, in writing of the final outcome upon resolution of the appeal.

Accessing the Protected Class Nondiscrimination Policy and Procedures (Disciplinary Process) for Domestic Violence, Dating Violence, Sexual Assault (Rape), and/or Stalking:

To access the Protected Class Nondiscrimination Policy and Procedures for reports of domestic violence, dating violence, sexual assault (rape), and/or stalking, please see the policy and/or the description of actions taken below.

1. Filing a Complaint:
 - a. The individual who experienced the behavior may initiate a complaint by reporting to the Title IX Coordinator. The Title IX Coordinator and/or designee will work with the individual who experienced the behavior to determine what action they would like to take, including action under the Protected Class Nondiscrimination Policy and Procedures.
 - b. The school may become aware of actions that would require institutional action without the consent of the individual who experienced the behavior. To the extent possible, based on the facts and circumstances known to the school, the Title IX Coordinator and/or designee will work with the individual who experienced the behavior, so that they understand their rights/options and requirements for participation when a mandatory case is taken.
 - c. In most cases, the decision is up to the individual who experienced the behavior.
 - d. The policy and procedure documents may be accessed at: <https://paul-mitchell-schools-website-1ightsai.s3.amazonaws.com/uploads/sites/275/Sarasota-Protected-Class-N>
2. How the School Determines What Policy Applies:

Each report received by the Title IX Coordinator is evaluated for jurisdiction and to determine if there is an immediate health and safety risk for the school. If the Title IX Coordinator and/or designee determines that there is no jurisdiction under the Protected Class Nondiscrimination Policy and Procedures, the Title IX Coordinator will make the appropriate referral to other processes, if applicable.
3. Steps in the Process:

Generally, the following procedural steps under the Protected Class Nondiscrimination Policy and Procedures for matters covered by Title IX include:

 - a) Upon receipt of a report of conduct that may be prohibited by the policy and also falls within the jurisdiction of the school and Title X Coordinator, the Title IX Coordinator will offer the individual who experienced the behaviors supportive measures (including available protective measures) and invite them to meet with the Title IX Coordinator or designee to discuss the options available to them and the process for filing a Formal Complaint.
 - b) If the individual who experienced the behavior (complainant) wishes to proceed with a formal complaint, the Title IX Coordinator will notify the respondent(s) of the allegations included in the formal complaint and will conduct an investigation in line with the Protected Class Nondiscrimination Policy and Procedures.

Campus Safety and Security Policy

- c) Prior to the completion of the investigation, the parties will be provided with an opportunity to review the evidence collected and submit written responses to the evidence collected.
 - d) The investigator will issue an investigative report to the Title IX Coordinator who will provide it simultaneously to both parties in preparation for the hearing.
 - e) The parties will be given notice for a hearing.
 - f) The hearing officer will preside over a live hearing, where each party will present witnesses and engage in cross-examination as set forth in the policy. Each party will be advised by a party of their choosing or if none is chosen, one will be appointed by the school.
 - g) Upon the conclusion of the hearing, the Hearing Officer will issue a written report using the preponderance of the evidence standard making determinations as to responsibility. If a finding of responsibility is made, the written document will include the sanction(s) to be imposed on the responsible party. This will be provided simultaneously to the parties.
 - h) Each party has the right to appeal the outcome to the Title IX Coordinator, as outlined in the Protected Class Nondiscrimination Policy and Procedures.
4. Anticipated Timelines:
The school makes every effort to complete the investigative process promptly while also following the required regulatory timeframes for notice and review. The process does also allow for timeframe extensions if either party requests or if there is a reasonable cause for the delay (like availability of parties or witnesses). Other reasonable reasons for delay may include complex investigations with many witnesses or other reasonable availability-based delays. The school will do its best to complete a formal complaint process within 180 days of receiving the formal complaint.
5. Decision-Making Process:
The decision-maker is an individual who has annual training on Title IX and VAWA requirements. The decision-maker will render their opinion based on a preponderance of the evidence standard after a live hearing, when Title IX applies. Please see the Protected Class Nondiscrimination Policy and Procedures for a complete description of the process.
6. Standard of Evidence:
The standard of evidence that is used in making determinations is the preponderance of the evidence standard. This means that it is more likely than not that the behavior did or did not occur.
7. Possible Sanctions:
Sanctions include, but are not limited to:
- a. Students:
Coaching: A formal statement that the conduct was unacceptable and a warning that further violation of any School policy, procedure, or directive will result in more severe sanctions/responsive actions. Suspension: Termination of Future Professional status for a definite period of time not to exceed two years and/or until specific criteria are met. Termination: Permanent termination of Future Professional status and revocation of rights to be on campus for any reason or to attend School-sponsored events. Other Actions: In addition to or in place of the above sanctions, the School may assign any other sanctions as deemed appropriate.
 - b. Employees:
Verbal or Written Warning Performance Improvement Plan/Management Process Enhanced Supervision, Observation, or Review Required Counseling Required Training or Education Probation Denial of Pay Increase/Pay Grade Loss of Oversight or Supervisory Responsibility Demotion Transfer Reassignment Assignment to New Supervisor Restriction of Stipends and/or Professional Development Resources Suspension/Administrative Leave with Pay Suspension/Administrative Leave without Pay Termination Other Actions: In addition to or in place of the above sanctions/responsive actions, the School may assign any other responsive actions as deemed appropriate.

If a student or employee is alleged to having committed dating violence or domestic violence, stalking, over which the School has jurisdiction, that student will have the right to a prompt, fair, and impartial investigation and hearing by an impartial investigator and hearing officer who have received annual training on issues related to stalking and how to conduct an investigation and hearing process that protects both the safety of the victim and promotes accountability and do not have a conflict of interest or bias for or against the accuser or the accused. This process is overseen by a Title IX Coordinator. The accused and the victim will each be allowed to have others present, including an advisor of their choice to accompany them throughout the hearing. The

Campus Safety and Security Policy

standard of evidence in this case requires a preponderance of the evidence that the incident more than likely occurred. The school's policy is to investigate the allegations and conduct a hearing within 150 days of receiving the complaint. If necessary, the school's investigative team may need additional time in order to properly conduct a review of the alleged incident and to come to a fair conclusion; however, the school will make every effort to expedite the review process, however there are certain regulatory review requirements that require some time for completion. If an extension of time is needed to conduct the investigation and hearing for good cause, the school will send a written notification to the complainant and respondent of the delay and the reason for the delay. The proceedings will be conducted in a manner that is consistent with the school's policies and is transparent to the Complainant and Respondent, which includes timely notice of meetings at which either or both, may be present; provides timely and equal access to the Parties and appropriate officials to any information that will be used during informal and formal disciplinary meetings and hearings; and that will be conducted by school officials who do not have a conflict of interest or bias for or against the Parties. Proceeding means all activities related to a non-criminal resolution of an institutional disciplinary complaint, including, but not limited to, fact-finding investigations, formal or informal meetings, and hearings. Proceeding does not include communications and meetings between officials and parties concerning accommodations or protective measures to be provided to a Party. The accuser and the accused Parties are entitled to the same opportunities to have an advisor of their choice present during the disciplinary proceeding,

The school's policy is to investigate the allegations and conduct a hearing within thirty days of receiving the complaint. If necessary, the school's investigative team may need additional time in order to properly conduct a review of the alleged incident and to come to a fair conclusion; however, the school will make every effort to expedite the review process. If an extension of time is needed to conduct the investigation and hearing for good cause, the school will send a written notification to the accuser and the accused of the delay and the reason for the delay.

The proceedings will be conducted in a manner that is consistent with the school's policies and is transparent to the accuser and accused, which includes timely notice of meetings at which the accuser or accused, or both, may be present; provides timely and equal access to the accuser, the accused, and appropriate officials to any information that will be used during informal and formal disciplinary meetings and hearings; and that will be conducted by school officials who do not have a conflict of interest or bias for or against the accuser or the accused. Proceeding means all activities related to a non-criminal resolution of an institutional disciplinary complaint, including, but not limited to, fact-finding investigations, formal or informal meetings, and hearings. Proceeding does not include communications and meetings between officials and victims concerning accommodations or protective measures to be provided to a victim. The accuser and the accused are entitled to the same opportunities to have an advisor of their choice present during the disciplinary proceeding, including the opportunity to be accompanied to any related meeting or proceeding. The school may establish restrictions regarding the extent to which the advisor may participate in the proceedings, as long as the restrictions apply equally to both parties. The appropriate Hearing Officer will hold a hearing to hear evidence about the complaint. Both Parties will simultaneously be informed in writing of the outcome and any institutional disciplinary proceeding, the opportunity for appeal and the notification of the outcome of any appeal before the results become final, and when the results of the proceedings become final. The results include any initial, interim, or final decision by the school regarding any sanctions imposed, as well as the rationale for the results and any sanctions. In accordance with the Violence Against Women Act, the school is required to publish the results of the hearing(s); however, the names of the individuals involved will be withheld. Result means any initial, interim, and final decision by any official or entity authorized to resolve disciplinary matters within the institution. The result must include any sanctions imposed by the institution. Notwithstanding section 444 of the General Education Provisions Act (20 U.S.C. 1232g), commonly referred to as the Family Educational Rights and Privacy Act (FERPA), the result must also include the rationale for the result and the sanctions. A student found guilty of violating the school's stalking policy could be criminally prosecuted in the state courts and may be reprimanded, sent to counseling, placed on probation, suspended, or expelled from the school for the first offense. Any information obtained during the school's investigation process will be shared with any parallel law enforcement investigation upon receipt of a court subpoena of the school's records. The school will protect the confidentiality of the victim(s) in accordance with the law.

Campus Safety and Security Policy

In some cases, the school may need to disclose some information about a victim to a third party to provide necessary accommodations or protective measures. The school will only disclose information that is necessary to provide the accommodations or protective measures requested and will carefully consider who may have access to this information to minimize the risk to a victim's confidentiality. The school will inform the victim before sharing personally identifiable information about him or her and only if it is necessary to provide an accommodation or protective measure. Compliance with these provisions of the Violence Against Women Act does not constitute a violation of Section 444 of the General Education Provision Act (20U.S.C. 1232g), commonly referred to as the Family Education Rights to Privacy Act of 1974 (FERPA). Any student or employee who reports to the school that he or she has been a victim of stalking, whether the offense occurred on or off campus, shall be provided with a written explanation of the student's or employee's rights and options. No officer, employee, or agent of the school shall retaliate, intimidate, threaten, coerce, or otherwise discriminate against any individual for exercising his or her rights or responsibilities under any provision of the Violence Against Women Act. A student found guilty of violating the school's stalking policy could be criminally prosecuted in the state courts and may be reprimanded, sent to counseling, placed on probation, suspended, or expelled from the school for the first offense. Any information obtained during the school's investigation process will be shared with any parallel law enforcement investigation upon receipt of a court subpoena of the school's records.

Campus Security

The school does not have individual campus security. All crimes are reported to the local police department for investigation and action on school premises or vicinity. We encourage all students and employees to timely report all crimes to the School Director/Campus Security Coordinator, who will promptly contact the local authorities to address the issue. Victims and witnesses are encouraged to report crimes, but it is solely on a voluntary basis. If you are a witness to the crime, contact 911 for immediate assistance, and, if you feel it is safe to intervene on behalf of the victim, do so in the presence of others, if possible, or call out to the perpetrator that you have contacted the police and indicate that they are on their way; do not put yourself in danger as well.

If you are a victim of a sexual assault, domestic violence, dating violence, or stalking at this institution or off the school premises, your first priority should be to get to a place of safety. You should then obtain necessary medical treatment. In the event that you witness rape or sexual violence on campus:

- a. Remain calm.
- b. Calm the victim; notify the School Director/Campus Security Coordinator.
- c. Inform the victim that he or she has the option to notify the appropriate law enforcement authorities, including the local police and for medical assistance. If the victim wants the School Director/Campus Security Coordinator to notify the authorities, he or she will call (911) for medical assistance and to alert the police. The School Director/Campus Security Coordinator and a representative from the police department will guide the victim through the available options and support the victim in his or her decision, including where applicable, restraining orders, orders for protection, no-contact orders, or similar lawful orders issued by a criminal or civil court.

If a victim chooses not to file a police report at the time of the incident, we recommend that the victim use a forensic nurse, who would conduct a forensic examination to preserve evidence in case the victim seeks to file criminal charges or obtain a restraining order at a later date. If the victim chooses to use a forensic examination, it does not require him or her to subsequently file a police report. Please contact the School Director/Campus Security Coordinator for information on where to obtain the services of a forensic nurse.

- d. The school encourages victims of sex offenses to seek professional counseling. The school will ensure that the victim has access to free confidential counseling from counselors specifically trained in the area of sexual assault, domestic violence, dating violence, stalking, and crisis intervention, as well as health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available for victims both in the school and the community.

Campus Safety and Security Policy

If you need to seek professional help or pastoral counselors after having been a victim of a rape, sexual assault, domestic violence, or dating violence, you can contact the School Director/Campus Security Coordinator or contact one of the following counseling centers:

<http://www.ovw.usdoj.gov/statedomestic.htm>
 Womens Resource Center
 340 S Tuttle Ave Sarasota, FL 342237
 941-366-1700

The school educates the student community about sexual assaults and date rape through mandatory orientation. The police department offers sexual assault education and informational programs to students and employees. Literature on date rape education, risk reduction, and the school’s response are available through the School Director/Campus Security Coordinator.

Reporting Crime to the School Community

In accordance with the Clery Act, schools must provide timely warnings in response to crimes that pose a continuing threat to the school campus. These warnings must be provided in a manner that is timely and that will aid in the prevention of similar crimes. Under the regulations, schools must not disclose the names and personally identifying information of victims when issuing a timely warning. However, in some cases to provide an effective timely warning, a school may need to provide information from which an individual might deduce the identity of the victim. The school will take each incident on a case-by-case basis, and will take all necessary steps to protect the identity of the victim whenever possible.

Any records of the incident will be maintained by the School Director/Campus Security Coordinator. Only staff members who need to know will be apprised of the name(s) of the victim(s). The school is required to publish each year statistics for certain crimes that are reported to the school authorities or local police agencies, including incidents of sexual assault, domestic violence, dating violence, and stalking; however, the report only includes incidents and not the names or identifiable information about the victim(s).

Type of Crime On-Campus	Number of Incidents			Number of Arrests		
	2020	2021	2022	2020	2021	2022
Sexual assault	0	0	0	0	0	0
Rape	0	0	0	0	0	0
Domestic violence	0	0	0	0	0	0
Dating violence	0	0	0	0	0	0
Stalking*	0	0	0	0	0	0
Fondling	0	0	0	0	0	0
Incest	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0
Hate Crimes based on Dating Violence	0	0	0	0	0	0
Hate Crimes based on Domestic Violence	0	0	0	0	0	0
Hate Crimes based on Stalking	0	0	0	0	0	0

The crimes listed above occurred in the following areas of campus:

Campus Safety and Security Policy

On-Campus Crimes Arrest and Disciplinary Referrals	Number of Incidents			Number of Arrests		
	2020	2021	2022	2020	2021	2022
Dating Violence	0	0	0	0	0	0
Domestic Violence	0	0	0	0	0	0
Stalking*	0	0	0	0	0	0

The crimes listed above occurred in the following areas of campus:

Public Property Crimes and Arrests and Disciplinary Referrals	Number of Incidents			Number of Arrests		
	2020	2021	2022	2020	2021	2022
Dating Violence	0	0	0	0	0	0
Domestic Violence	0	0	0	0	0	0
Stalking*	0	0	0	0	0	0

The crimes listed above occurred in the following areas of campus:

Non-Campus Buildings and Property Crimes and Arrest and Disciplinary Referrals	Number of Incidents			Number of Arrests		
	2020	2021	2022	2020	2021	2022
Dating Violence	0	0	0	0	0	0
Domestic Violence	0	0	0	0	0	0
Stalking*	0	0	0	0	0	0

The crimes listed above occurred in the following areas of campus:

**Stalking*—stalking which crosses calendar years should be recorded in each and every year in which the stalking is reported to a campus security authority or local police.

The following crime reports were considered “unfounded” and subsequently withheld from its crime statistics during each of the following three most recent calendar years. Identify the unfounded crime and the year it occurred.

All reported crimes must be reported. If the school has any crimes that were determined to be unfounded, the school must disclose that information. A school may not withhold, or subsequently remove, a reported crime from its crime statistics based on a decision by a court, coroner, jury, prosecutor, or other similar non-campus official. Only a sworn or commissioned law enforcement personnel may “unfound” a crime report for purposes of reporting under this section. The recovery of stolen property, the low value of stolen property, the refusal of the victim to cooperate with the prosecution, and the failure to make an arrest do not “unfound” a crime report. The school will retain any documentation that would support the “unfound” report of a crime to review by the U.S. Department of Education. Crimes reported must indicate whether the crime was on campus, in a non-campus building or property, or on a public property. When recording reports of stalking that include activities in more

Campus Safety and Security Policy

than one calendar year, the school will record a crime statistic for each year in which the course of conduct is reported to the local police or to the School Director/Campus Security Coordinator. The school will record each report of stalking as occurring at only the first location within the institution's Clery geography in which a perpetrator engaged in the stalking course of conduct or when the victim first became aware of the stalking. The statistics do not require the identification of the victim or the person accused of committing the crime.

Sex Offenders Registry

In accordance with the Violent Crime Control and Law Enforcement Act of 1994 (42 U.S.C. § 14071(j)), and the Adam Walsh Child Protection and Safety Act of 2006, we are notifying you that you can obtain information concerning registered sex offenders by visiting www.familywatchdog.us for a list of registered offenders near the school premises.

ACKNOWLEDGEMENT OF STUDENTS/STAFF:

I acknowledge that I have read and understand the policies and procedures explicated in this document titled: "Campus Safety and Security Policy." I also acknowledge that I accept the conditions and responsibilities outlined within this document.

Signature of Student/Employee: _____ Date: _____

Signature of Administration: _____ Date: _____

Campus Safety and Security Policy Daily Log

Nature of the Crime	
Date	Time
General Location	
Disposition of the Complainant	

Nature of the Crime	
Date	Time
General Location	
Disposition of the Complainant	