

CAMPUS SECURITY REPORT and Sexual Misconduct policy

The campus property of the New England School of Hair Design is comprised of the plot leased to the New England School of Hair Design Inc. and does not include private property adjacent to the campus or across the street. Therefore only crimes committed on campus and within the 50ft area of interchange drive that is adjacent to the campus, or to the tenant, (Joe's Equipment), meet the requirements to be reported in the campus crime statistics. There has been one drug offense reported somewhere on Interchange drive in 2014. There is no evidence that it occurred in the area of the 50 ft. right of way adjacent to school property. There are no other reportable crimes 2012, 2013, 2014.

Correction:

There were crimes reported in error on the 2013 Crime Report, in areas designated as public property, however there is no evidence that they were within the 50 ft. area of Interchange Drive which is adjacent to the campus.

Security Policies Crime Log:

The New England school of Hair Design does not keep a crime log. This institution does not have a Security Department and, therefore, is not required to maintain a crime log.

Fire Log:

The New England School of Hair Design does not have any on-campus student housing facilities, and is, therefore, not required to maintain a fire log.

POLICIES

Policies for Preparing the Annual Disclosure of Crime Statistics:

The Annual Report for Crime Statistics is prepared in cooperation with the Lebanon Police Department using their records analysis system. Reports for Interchange Drive will be sufficient to cover all campus property and public property. The reports will be combined with any reports of crimes that are made to the Owner or Director or other employee of the school and the final statistics will be reported to the student body whereby the report will be given to each student and employee prior to October 1st each year.

Who to Report Clery and Other Crimes to:

NESHHD has no Security Personnel and is entirely dependent on the Lebanon Police Department, state and federal officials for security.

Report any and all crimes you know about to the Lebanon Police Department and to NESHHD officials in the following sequence; The School Owner, School Comptroller, School Director, Financial Aid Officer, and Instructors.

Lebanon Police Department	603-448-1212
NH State Police	800-525-5555
	603-223-4381
Facsimile (FAX)	603-271-1153
TTY/TDD Relay Services	800-735-2964
Emergency Cell for NH, ME, MA	*77

Limited Voluntary Confidential Reporting:

NESHHD encourages anyone who is the victim of or witness to any crime to promptly report the incident to the Lebanon NH Police Department. Since police reports are public records under state law, NESHHD cannot hold reports of crime in confidence.

Security of and Access to Campus Facilities:

NESHHD does not have security personnel, but is protected with motion detectors and security cameras which alert the Lebanon Police Department if there is a break in security. During posted school hours the facility will be open to the public. After hours the school will be locked and security measures will be activated. The school has no student residence halls. The parking lot is lighted and cars left overnight may be towed. City police patrol the area.

Campus Law Enforcement:

NESHHD does not have a campus security force. All campus crimes are referred to the Lebanon Police. NESHHD has no special understanding or MOU with the Lebanon Police Department.

Accurate and Prompt Reporting:

NESHHD does not have a campus security police force. The Student Handbook encourages students to report criminal activity immediately to the police and then to school officials at NESHHD.

Lebanon Police Department	603-448-1212
NH State Police	800-525-5555
	603-223-4381
Facsimile (FAX)	603-271-1153
TTY/TDD Relay Services	800-735-2964
Emergency Cell for NH, ME, MA	*77

Pastoral Counselors and Professional Counselors:

NESHHD has no pastoral or professional counselors. We encourage the student to contact;

WISE 398 Bank Street, Lebanon NH 03766	1-866-348-WISE (9473)
	603-448-5525 (Crisis Line)
	603-448-5922 (Office)

Monitoring of Criminal Activity:

NESHHD does not use local police to monitor and document criminal activity by your students at off-campus locations of student organizations.

Security Awareness Programs for Students and Employees:

NESHHD does not offer any security or crime awareness programs. Students and employees may go to <http://police.lebnh.net/home/police-docs/safety-tips> to make themselves aware of a number of crime prevention techniques covering such topics as theft prevention, driving safety, scammers, pedestrian safety, summer safety and weather. The security topic in the Student Handbook is designed to inform students and employees about campus security procedures and practices and to encourage students and employees to be responsible for their own security and the security of others.

Criminal Activity Off Campus:

NESHHD has no off-campus locations of student organizations or off-campus housing facilities and is not have a policy nor is it required to have a policy. NESHHD does not monitor off campus activity. Alcohol laws are strictly enforced by the Lebanon Police Department. The possession, sale, manufacture or distribution of any controlled substance is illegal under both state and federal laws. Such laws are strictly enforced by the Lebanon Police Department. Violators are subject to NESHHD disciplinary action, criminal prosecution, fine and imprisonment.

Possession, Use and Sale of Alcoholic Beverages and Enforcement of State Underage Drinking:

The possession, sale or the furnishing of alcohol on the NESHD campus is governed the laws of the State of NH. Laws regarding the possession, sale, consumption or furnishing of alcohol by anyone under 21 years of age in a public place or a place open to the public is illegal. Organizations or groups violating alcohol/substance policies or laws may be subject to legal and NESHD sanctions.

Possession, Use and Sale of Illegal Drugs and Enforcement of Federal and State Drug Laws:

The NESHD campus has been designated “Drug Free” and only under certain circumstances is the consumption of alcohol permitted. The possession, sale, manufacture or distribution of any controlled substance is illegal under both state and federal laws. Such laws are strictly enforced by the Lebanon Police Department. Violators are subject to NESHD disciplinary action, criminal prosecution, fine and imprisonment. The school’s Drug and Alcohol Education, Abuse and Prevention Policy can be found in the Student Handbook.

Drug and Alcohol Prevention and Education Program:

The NESHD drug and alcohol prevention and education program consists of a description of the NH alcohol and drug laws and information about the NESHD policies pertaining to illegal drugs and to alcohol. The program is published the Student Handbook and discussed during each student’s orientation. The program prevents the illicit use of drugs and the abuse of alcohol by students and employees. The program provides services related to drug use and abuse including dissemination of informational materials, educational programs, counseling services, referrals and college disciplinary actions.

Disclosures to Alleged Victims of Crimes of Violence or Non-forcible Sex Offenses:

NESHD will, upon written request, disclose to the alleged victim of a crime of violence, or a non-forcible sex offense, the results of any disciplinary hearing conducted by the college against the student who is the alleged perpetrator of the crime or offense. If the alleged victim is deceased as a result of the crime or offense, NESHD will provide the results of the disciplinary hearing to the victim’s next of kin, if so requested.

*Emergency Notification, NESHD’s Emergency Response and Evacuation Procedures:***Impending Threat Notification**

A school official will immediately, upon confirmation from the Lebanon Police or appropriate authority, notify the campus community of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus. Examples of some impending emergencies are listed below:

- Approaching tornado, hurricane or other extreme weather conditions.
- Earthquake.
- Gas leak.
- Terrorist incident.
- Armed intruder.
- Bomb threat.
- Civil unrest or rioting.

Confirmation of Emergency:

To confirm an emergency an institution official, (or officials), will verify that a legitimate emergency or dangerous situation exists. The following officials are responsible in the sequence listed; School Owner, School Comptroller, School Director, Financial Aid Officer working in conjunction with Instructors present at the time of the emergency. Confirmation doesn’t necessarily mean that all of the pertinent

details are known or even available. Confirmation may be made by calling the Lebanon Police and or Lebanon Fire Department, NH or VT State Police, Homeland Security or Federal Authorities. If these authorities are broadcasting warnings on the public media, the school authority may make a judgment based upon that type of confirmation.

Notification of Emergency:

NESHHD will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to or otherwise mitigate the emergency. The director or school official in charge will personally tour the facility, parking lot and grounds and tell all students and persons of the emergency. To communicate with students not in school the school official in charge will post the emergency notifications and recommendations to the school face book, twitter and/or call each student. The school official may also ask students to call, text, twitter and face book through a formal or informal phone tree. Notifications may also be posted on the main entrance door.

Annual Emergency Notification and Evacuation Drill:

In the case of a fire impending emergency, a school official will sound a horn and the students will evacuate through the marked fire exits in an orderly fashion. Each student will escort her/his client to the fire exits where marked when possible. A school official will clear the building and grounds of all persons. All students, staff and clients will immediately gather in the Northwest corner of the parking lot, (lot closest to Brown Furniture). The receptionist or school official will bring the attendance book and appointment pages out with her and conduct an attendance check and client check to determine if everyone is accounted for. A safety ladder is stored on top of the file cabinet in the administrative offices on the top floor to be used as an escape route from the balcony.

- The date of the most recent annual test: November 19,2014
- Time Elapsed: 2 minutes 20 seconds
- Unannounced

“Shelter-in-Place” Guidance:

If an incident occurs and the building you are in is not damaged, stay inside, seeking an interior room, until you are told it is safe to come out. If your building is damaged, take your personal belongings, (purse, wallet, etc.), and follow the evacuation procedures for your building. (Close your door, proceed to the nearest exit, and use the stairs instead of the elevators.) Once you have evacuated, seek shelter at the nearest building quickly. If police or fire department personnel are on the scene, follow their directions.

How You Will Know to “Shelter-in-Place?”:

A shelter-in-place notification may come from several sources, including the Lebanon Police, NH State Police or federal authorities.

How to “Shelter-in-Place”:

No matter where you are, the basic steps of shelter-in-place will generally remain the same. Should the need ever arise, follow these steps, unless instructed otherwise by local emergency personnel:

1. If you are inside, stay where you are. Collect any emergency shelter-in-place supplies and a telephone to be used in case of emergency. If you are outdoors, proceed into the closest building quickly or follow instructions from emergency personnel on the scene.
2. Locate a room to shelter inside. It should be:
 - An interior room;
 - Above ground level; and

- Without windows or with the least number of windows. If there is a large group of people inside a particular building, several rooms maybe necessary
3. Shut and lock all windows, (tighter seal), and close exterior doors.
 4. Turn off air conditioners, heaters, and fans.
 5. Close vents to ventilation systems as you are able. (NESHD staff will turn off ventilation as quickly as possible.)
 6. Make a list of the people with you and ask someone, (faculty or other staff), to call the list in so they know where you are sheltering. If only students are present, one of the students should call in the list.
 7. Turn on a radio or TV and listen for further instructions.
 8. Make yourself comfortable

Timely Warning:

In the event that a situation arises, either on or off campus, that, in the judgment of the Lebanon NH Chief of Police constitutes an ongoing or continuing threat, a campus wide “timely warning” will be issued. The warning will be announced to all students at the school’s attendance check. Depending on the particular circumstances of the crime, especially in all situations that could pose an immediate threat to the community and individuals, NESHD may send individual emails or text messages to students describing the danger, providing the NESHD community with more immediate notification. Anyone with information warranting a timely warning should report the circumstances to the Lebanon Police office, and school officials, by phone or in person.

Before issuing a Timely Warning, the school officials shall determine the nature of the crime. NESHD will consider the type of crime that was reported to determine if it is a Clery crime. NESHD will also consider if the crime is continuing danger to the campus community. (For example, if a rape is reported on campus and the alleged perpetrator has not been caught, the risk is there. If the alleged perpetrator was apprehended, there is no continuing risk.)

Missing Student Notification:

NESHD has no on-campus student housing facilities and therefor is not required to have a missing student notification policy.

Addressing Preventing and Responding to Sex Offenses, Educational Programs to Promote the Awareness of Rape, Acquaintance Rape and Other Forcible and Non-Forcible Sex Offenses:

NESHD educates the student community about sexual assaults and date rape through mandatory Freshman Orientation where it refers students to literature on date rape education, risk reduction, is available through the following contacts.

WISE 398 Bank Street, Lebanon NH 03766

**1-866-348-WISE (9473)
603-448-5525 (Crisis Line)
603-448-5922 (Office)**

THE CUT IT OUT PROGRAM® <http://probeauty.org/cutitout/>
CUT IT OUT®

Salons Against Domestic Abuse is dedicated to mobilizing salon professionals and others to fight the epidemic of domestic abuse in communities across the U.S. by building awareness and training salon professionals to recognize warning signs and safely refer clients, colleagues, friends and family to local resources.

Disclosure to the Alleged Victim of a Crime of Violence, or a Non-Forcible Sex Offense:

NESHD will, upon written request, disclose to the alleged victim of a crime of violence, or a non-forcible sex offense, the results of any disciplinary hearing conducted by NESHD against the student who is the alleged perpetrator of the crime or offense. If the alleged victim is deceased as a result of the crime or offense, NESHD will provide the results of the disciplinary hearing to the victim's next of kin, if so requested. If you are a victim of a sexual assault at this institution, your first priority should be to get to a place of safety. You should then obtain necessary medical treatment. The Lebanon Police Department strongly advocates that a victim of sexual assault report the incident in a timely manner. Time is a critical factor for evidence collection and preservation. An assault should be reported directly to a NESHD officer. Filing a police report with a NESHD officer will not obligate the victim to prosecute, nor will it subject the victim to scrutiny or judgmental opinions from officers.

Filing a police report will:

- ensure that a victim of sexual assault receives the necessary medical treatment and tests, at no expense to the victim;
- provide the opportunity for collection of evidence helpful in prosecution, which cannot be obtained later, (ideally a victim of sexual assault should not wash, douche, use the toilet, or change clothing prior to a medical/legal exam);
- assure the victim has access to free confidential counseling from counselors specifically trained in the area of sexual assault crisis intervention.

When a sexual assault victim contacts the Police Department, the Police Sex Crimes Unit will be notified as well. The victim of a sexual assault may choose for the investigation to be pursued through the Lebanon Police Department. NESHD disciplinary proceedings, as well as special guidelines for cases involving sexual misconduct, are detailed in the Student Handbook. A student found guilty of violating the NESHD sexual misconduct policy could be criminally prosecuted in the state courts and may be suspended or expelled from NESHD for the first offense.

Advising the Campus Community About Sex Offenders:

The Campus Sex Crimes Prevention Act (CSCPA) of 2000 is a federal law that provides for the tracking of convicted sex offenders enrolled at, or employed at, institutions of higher education. The CSCPA is an amendment to the Jacob Wetterling Crimes Against Children and Sexually Violent Offender Act. The federal law requires state law enforcement provide NESHD with a list of registered sex offenders who have indicated that they are either enrolled, employed or carrying on a vocation NESHD. NESHD is required to inform the campus community that the registration list of sex offenders will be available at the Financial Aid Office of NESHD where the staff will assist in viewing the list of all registered sex offenders in NH.

<http://publicrecords.onlinesearches.com/New-Hampshire-Sex-Offender-Registration.htm>

VT is available from the Vermont Sex Offender Registry http://vcic.vermont.gov/sex_offender

The CSCPA further amends the Family Educational Rights and Privacy Act of 1974 (FERPA) to clarify that nothing in the act can prohibit an educational institution from disclosing information provided to the institution concerning registered sex offenders.

New England School of Hair Design

Sexual Misconduct Policy

INTRODUCTION

The New England School of Hair Design *hereafter* called the “college” is committed to providing a safe environment for its students. The school does not tolerate sex or gender based misconduct. When an allegation of misconduct is brought to the appropriate administrators attention and a person is found to have violated this policy, sanctions will be used to reasonable assure that such actions are not repeated.

SCOPE

1. This policy applies to:
 - a. All staff, faculty, students, and third parties such as clients or visitors to the school during the school hours of 8:30AM to 4:30 PM Tuesday through Saturday. Staff, faculty, students, clients and visitors should not be on the property on Sunday or Monday or before 8:30 AM or after 4:30 PM without permission. This policy applies regardless of sexual orientation or gender identification.
 - b. Offsite activities of the school which are supervised by staff or faculty. If a student is victimized off school property the student may wish to speak with a staff member however the school cannot investigate or adjudicate when the perpetrator is not a student of the school. Such an incident is outside the scope of our policy.
 - c. Students are defined as persons attending the Cosmetology, Manicuring or Instructor Training program.
 - d. School property. This is defined as the property leased to the school consisting of the school area and the school parking lot.
 - e. Public property. This is defined as the publically owned property adjacent to the school property consisting of 50 feet of public road at the school entrance.
 - f. Sexual misconduct covered by the Violence Against Women Act. (VAWA)
 - i. Dating Violence
 - ii. Domestic Violence
 - iii. Sexual violence
 - iv. Stalking
2. Confidentiality

The college encourages victims of sexual violence to talk to somebody about what happened –so that victims can get the support they need, and so the college can respond

appropriately. Different employees on campus have different abilities to maintain a victim's confidentiality:

- Some are required to maintain near complete confidentiality; talking to them is sometimes called a “privileged communication.”
- Other employees may talk to a victim in confidence, and generally only report to the school that an incident occurred without revealing any personally identifying information. Disclosures to these employees will not trigger a college investigation into an incident against the victim's wishes.
- Thirdly, some employees are required to report all the details of an incident, (including the identities of both the victim and alleged perpetrator) to the Title IX Coordinator. A report to these employees, (called “responsible employees”), constitutes a report to the college—and generally obligates the school to investigate the incident and take appropriate steps to address the situation. This policy is intended to make students aware of the various reporting and confidential disclosure options available to them—so they can make informed choices about where to turn should they become a victim of sexual violence. The College encourages victims to talk to someone identified in one or more of these groups.

THE OPTIONS FOR REPORTING SEXUAL MISCONDUCT

Privileged and Confidential Communications with Professional and Pastoral Counselors

Professional, licensed counselors and pastoral counselors who provide mental-health counseling to members of the school community, (and including those who act in that role under the supervision of a licensed counselor), are not required to report any information about an incident to the Title IX Coordinator without a victim's permission. Following is the contact information for these individuals:

- i. Wiseoftheuppervalley.org
- ii. Wise Program Center, 38 Bank Street, Lebanon NH 03766—phone 603-448-5922

Non-Professional Counselors and Advocates Individuals Who Work On-Campus

Individuals, who work at the school, including front desk staff, can generally talk to a victim without revealing any personally identifying information about an incident to the college. A victim can seek assistance and support from these individuals without triggering a school investigation that could reveal the victim's identity or that the victim has disclosed the incident. While maintaining a victim's confidentiality, these individuals or their office should report the nature, date, time, and general location of an incident to the Title IX Coordinator. This limited report – which includes no information that would directly or indirectly identify the victim—helps keep the Title IX Coordinator informed of the general extent and nature of sexual violence on and off campus so the coordinator can track patterns, evaluate the scope of the problem, and formulate appropriate campus-wide responses. Before reporting any information to the Title IX Coordinator, these individuals will consult with the victim to ensure that no personally identifying details are

shared with the Title IX Coordinator. Following is contact information for these non-professional counselors and advocates:

All Instructors Currently Working for the School

A victim who speaks to a professional or non-professional counselor or advocate must understand that, if the victim wants to maintain confidentiality, the school will be unable to conduct an investigation into the particular incident or pursue disciplinary action against the alleged perpetrator. Even so, these counselors and advocates will still assist the victim in receiving other necessary protection and support, such as victim advocacy, academic support or accommodations, disability, health or mental health services, and changes to living, working or course schedules. A victim who at first requests confidentiality may later decide to file a complaint with the school or report the incident to local law enforcement, and thus have the incident fully investigated. These counselors and advocates will provide the victim with assistance if the victim wishes to do so.

NOTE: If the school determines that the alleged perpetrator(s) pose a serious and immediate threat to the college community, [By the Director or Gary Trotter], may be called upon to issue a timely warning to the community. Any such warning should not include any information that identifies the victim.

REPORTING TO “RESPONSIBLE EMPLOYEES”

A “responsible employee” is a college employee who has the authority to redress sexual violence, who has the duty to report incidents of sexual violence or other student misconduct, or who a student could reasonably believe has this authority or duty.

When a victim tells a responsible employee about an incident of sexual violence, the victim has the right to expect the college to take immediate and appropriate steps to investigate what happened and to resolve the matter promptly and equitably. A responsible employee must report to the Title IX coordinator all relevant details about the alleged sexual violence shared by the victim and that the college will need to determine what happened –including the names of the victim and alleged perpetrator(s), any witnesses, and any other relevant facts, including the date, time and specific location of the alleged incident.

To the extent possible, information reported to a responsible employee will be shared only with people responsible for handling the college’s response to the report.

NOTE: Although some of the non-professional counselors and advocates described above could have responsibilities that would otherwise make them “responsible employees” for Title IX purposes, they need only report general, non-personally identifying information to the Title IX Coordinator, not the details of an incident. See U.S. Department of Education, Office for Civil Rights, Questions and Answers on Title IX and Sexual Violence (April 2014), E-3 (urging schools

to designate these individuals as confidential sources, and exempting them from detailed-reporting requirement).

A responsible employee should not share information with law enforcement without the victim's consent or unless the victim has also reported the incident to law enforcement.

The following employees (or categories of employees), are the college's responsible employees:

Director

Financial Aid Officer

Comptroller

Admissions Director

Before a victim reveals any information to a responsible employee, the employee should ensure that the victim understands the employee's reporting obligations and, if the victim wants to maintain confidentiality, direct the victim to confidential resources. If the victim wants to tell the responsible employee what happened but also maintain confidentiality, the employee should tell the victim that the college will consider the request, but cannot guarantee that the college will be able to honor it. In reporting the details of the incident to the Title IX Coordinator, the responsible employee will also inform the coordinator of the victim's request for confidentiality. Responsible employees will not pressure a victim to request confidentiality, but will honor and support the victim's wishes, including for the college to fully investigate an incident. By the same token, responsible employees will not pressure a victim to make a full report if the victim is not ready to.

Requesting Confidentiality from the college: How the school will weigh the request and respond
If a victim discloses an incident to a responsible employee but wishes to maintain confidentiality or requests that no investigation into a particular incident be conducted or disciplinary action taken, the college must weigh that request against the college's obligation to provide a safe, non-discriminatory environment for all students, including the victim. If the college honors the request for confidentiality, a victim must understand that the college's ability to meaningfully investigate the incident and pursue disciplinary action against the alleged perpetrator(s) maybe limited. Although rare, there are times when the college may not be able to honor a victim's request in order to provide a safe, non-discriminatory environment for all students.

The college has designated the following individual(s) to evaluate requests for confidentiality once a responsible employee is on notice of alleged sexual violence: Gary Trottier, President.

When weighing a victim's request for confidentiality or that no investigation or discipline be pursued, Gary Trottier, President, will consider a range of factors, including the following:

The increased risk that the alleged perpetrator will commit additional acts of sexual or other violence, such as:

Whether there have been other sexual violence complaints about the same alleged perpetrator;

Whether the alleged perpetrator has a history of arrests or records from a prior school indicating a history of violence;

Whether the alleged perpetrator threatened further sexual violence or other violence against the victim or others;

Whether the sexual violence was committed by multiple perpetrators;

Whether the sexual violence was perpetrated with a weapon;

Whether the victim is a minor;

Whether the college possesses other means to obtain relevant evidence of the sexual violence, (e.g., security cameras or personnel, physical evidence);

Whether the victim's report reveals a pattern of perpetration (via illicit use of drugs or alcohol), at a given location or by a particular group.

The presence of one or more of these factors could lead the college to investigate and, if appropriate, pursue disciplinary action. If none of these factors is present, the college will likely respect the victim's request for confidentiality.

If the college determines that it cannot maintain a victim's confidentiality, the college will inform the victim prior to starting an investigation and will, to the extent possible, only share information with people responsible for handling the college's response. The college will remain ever mindful of the victim's well-being, and will take ongoing steps to protect the victim from retaliation or harm and work with the victim to create a safety plan. Retaliation against the victim, whether by students or college employees, will not be tolerated. The college will also:

Assist the victim in accessing other available victim advocacy, academic support, counseling, disability, health or mental health services, and legal assistance both on and off campus (see portion of policy identifying these);

Provide other security and support, which could include issuing a no-contact order, helping arrange a change of living or working arrangements or course schedules (including for the alleged perpetrator pending the outcome of an investigation) or adjustments for assignments or tests; and

Inform the victim of the right to report a crime to campus or local law enforcement –and provide the victim with assistance if the victim wishes to do so.

If, for example, the school has credible information that the alleged perpetrator has committed one or more prior rapes, the balance of factors would compel the school to investigate the allegation and, if appropriate, pursue disciplinary action.

The school may not require a victim to participate in any investigation or disciplinary proceeding. Because the college is under a continuing obligation to address the issue of sexual violence campus-wide, reports of sexual violence, (including non-identifying reports) will also prompt the college to consider broader remedial action –such as increased monitoring, supervision or security at locations where the reported sexual violence occurred; increasing education and prevention efforts, including to targeted population groups; conducting climate assessments/victimization surveys; and/or revisiting its policies and practices.

If the school determines that it can respect a victim’s request for confidentiality, the school will also take immediate action as necessary to protect and assist the victim.

Anonymous Reporting

Although the College encourages victims to talk to someone, the College provides an online [or other system] for anonymous reporting. The system will notify the user (before s/he enters information) that entering personally identifying information may serve as notice to the College for the purpose of triggering an investigation.

OFF-CAMPUS COUNSELORS AND ADVOCATES

Off-campus counselors, advocates, and health care providers will also generally maintain confidentiality and not share information with the college unless the victim requests the disclosure and signs a consent or waiver form.

Following is contact information for the local off -campus resource:

Wiseoftheupervalley.org

Wise Program Center, 38 Bank Street, Lebanon NH 03766—phone 603-448-5922

OPTIONS FOR ASSISTANCE FOLLOWING AN INCIDENT OF SEXUAL MISCONDUCT

Immediate Assistance

Students may contact:

WISE at 38 Bank Street Lebanon NH 603-448-5922 www.wiseuv.org
 www.facebook.com/wiseuv
 Lebanon Police 603-448-1212

SEXUAL ASSAULT RESPONSE TEAM (SART)

A sexual assault response team (SART) is provided by WISE at 38 Bank Street Lebanon NH. 603-448-5922 www.wiseuv.org ww.facebook.com/wiseuv

The SART will:

1. Ensure the victim is aware of the options to seek treatment for injuries, preventative treatment for sexually transmitted diseases, and other health services.
2. Discuss the option of seeking medical treatment in order to preserve evidence.
3. Identify where/how to get a rape kit or find a Sexual Assault Nurse Examiner (SANE).

ONGOING ASSISTANCE

Counseling, advocacy, and support, health, mental health– The school has no on campus resources however you may contact WISE for these services. Students may contact WISE at 38 Bank Street Lebanon NH 603-448-5922 www.wiseuv.org ww.facebook.com/wiseuv

ONGOING SUPPORT DURING THE INSTITUTIONAL DISCIPLINARY OR CRIMINAL PROCESS

Academic accommodations and interim measures: The school will take reasonable steps and interim measures to ensure the safety and well-being of the victim, such as alter academic schedules, withdraw from/retake a class without penalty.

THE TITLE IX COORDINATOR

The Title IX Coordinator for New England School of Hair Design is Gary Trottier. The college's Title IX coordinator's role is to enforce this policy as the overall response to sexual misconduct.

Contact information: Gary Trottier, gtrottier1@neshd.org 603-298-5199, 12 Interchange Drive West Lebanon NH 0784

DEFINITIONS

Dating Violence Definition:

Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with a victim.

Social Relationship of a Romantic or Intimate Nature

Determination is based upon the reporting party's statement (including the statement of a third-party other than the victim) taking into consideration:

- The length of the relationship;
- The type of the relationship; and
- The frequency of the relationship

Dating Violence – Psychological or Emotional Abuse

We fully support the inclusion of emotional and psychological abuse in definitions of “dating violence” used for research, prevention, victim service, or intervention purposed, however according to the United States Department of Education they do not believe that it should be included in the definition of “dating violence” for purposed of crime reporting.

Domestic Violence Definition:

A felony or misdemeanor crime of violence committed by:

- Current or former spouse or intimate partner;
- Person with whom the victim shares a child in common;
- A person cohabitating, or has cohabitated with, the victim as a spouse or intimate partner;
- A person similarly situated to a spouse under the domestic and family violence laws of the jurisdiction in which the crime of violence; or
- Any other person against an adult or youth victim who is protected from that person's acts under the domestic and family violence laws of the jurisdiction in which the crime of violence occurred.

Sexual Violence Definition:

An offense that meets the definition of rape, fondling, incest, or statutory rape as used in the FBI's UCR program included in Appendix A of Subpart D of Part 668.

Stalking 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

Course of Conduct Definition:

Engaging in 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, surveils, threatens or communicates to or about a person, or interferes with a person's property.

Reasonable Person Definition:

A reasonable person under similar circumstances and with similar identities to the victim.

Substantial Emotional Distress Definition:

Significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

Consent Definition:**Consent: Permission for something to happen or agreement to do something**

- Silence or absence of resistance does not imply consent;
- Consent to engage in sexual activity with one person does not imply consent with another;
- Consent can be withdrawn at any time;
- Coercion, force, or threat of either invalidates consent;
- If someone is under the influence of alcohol or drugs they cannot consent.

CLEAR STATEMENT AGAINST SEX DISCRIMINATION

The policy applies to all students and employees regardless of sexual orientation or gender identity. The policy may apply to third parties such as clients.

CLEAR STATEMENT OF THE SCHOOL'S COMMITMENT TO VAWA

The school is commitment to providing a safe environment for students, staff and faculty and is committed to the heart and the spirit of VAWA.

WHAT IS COVERED BY VAWA

Students, staff and faculty on the school property between the hours of 8:30 am and 4:30 pm on Tuesday through Saturday are covered by VAWA. The school property includes the building and the parking lot. As a reminder no student, staff or faculty member should be on the property before 8:30 am, after 4:30 pm and on Sundays and Mondays unless they have permission.

- Off-site activities in which the students, staff and faculty participate are covered by the policy.
- Students attending the Cosmetology, Esthetics, and Nail Technology, or Instructor Training program are covered by the policy.

If a student is victimized off school property the student may certainly talk to someone at the school for guidance however the school cannot investigate or adjudicate this type of incident as the perpetrator is not a student an outside the scope of this policy.

INVESTIGATION PROCEDURES AND PROTOCOLS

Please note: The school's Title IX Coordinator is not expected to be a lawyer, police officer or any type of law enforcement or investigative professional. The adjudication aspects of VAWA will need to be done in conjunction with local law enforcement and/or local domestic or sexual violence centers.

Students ARE NOT required to report any victimization to the school, police or sexual violence crisis centers.

If victimization should be reported to the school, investigation and adjudication will be performed to the best of the ability of the Title IX Coordinator. The Title IX Coordinator does not possess skills which can be better performed by law enforcement or sexual violence crisis centers. At present the United States Department of Education will not have approved trainers or training for at least 2 years as explained by James Moore on April 15, 2015 at the PCCS conference in Philadelphia. We do not want to minimize the importance of a proper investigation and adjudication. Any student who wants a properly done investigation and s\adjudication should know this information.

If the victim remains confidential and does not reveal the perpetrator's name there will be no investigation. Should the victim want an investigation the Title IX Coordinator will explain what can be done without the help of law enforcement? This will depend on the incident. If the victim wants law enforcement involved they will be called and take over the case.

Time Frame for investigation. If an investigation is done by the school the time frame will depend on the type of incident and possibly other unanticipated factors however every effort will be made to conduct the investigation in a timely manner. If the victim wants local law enforcement to do the investigation the timeframe will be explained by them.

Preserving evidence. The school does not have expertise in this area and does not make any statements or guarantees in this area.

The Title IX Coordinator will make every effort to provide equitable rights to the victim and perpetrator during the schools process through all channels available while protecting the victim.

Information Sharing. The victim will determine what information may or may not be shared with law enforcement unless the information must be shared for the public safety. That will be discussed with the victim prior to any disclosures.

Where necessary, the school will take immediate steps to protect complainants pending the final outcome of an investigation, including academic accommodations such as withdraw from/retake a class without penalty; the alleged perpetrator's course schedule.

If a victim's request for confidentiality limits the school's ability to investigate a particular matter, the school may take reasonable steps to limit the effects of the alleged sexual misconduct and

prevent its recurrence without initiating formal action against the alleged perpetrator or revealing the identity of the student complainant.

GRIEVANCE/ADJUDICATION PROCEDURES

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Adjudication

Mediation is not used in sexual assault cases but may be used in other areas covered by VAWA;

The school will never assume any person is in violation of the schools policy. The preponderance-of-the-evidence (i.e., more likely than not) standard will be used in any Title IX fact-finding and related proceedings, including any hearings;

Identify the adjudicators, including:

The adjudicators will be the Title IX coordinator and all responsible employees as identified in this document. If the police are brought in that would determine who the adjudicators will be.

There is no training available to determine whether an incident occurred. The school will enlist the services of WISE or the police to make this determination.

Determine the sanction. The sanction will be determined by the Title IX Coordinator with the advice of council and the school's responsible employees. The school reserves the right to take whatever measures it deems necessary in response to an allegation of sexual misconduct in order to protect students' rights

and safety. Not all sexual misconduct will be deemed equally serious and the school reserves the right to impose a range of sanctions, ranging from verbal warning to expulsion, depending on the severity of the offense. The school will consider the concerns of both the complainant and the person accused of sexual misconduct. This would be done without revealing the victim's name if so desired by the victim.

Conflicts of Interest: if the victim or perpetrator is concerned with a possible conflict of interest they may put their concerns in writing to be reviewed by the Title IX coordinator and the responsible parties.

Both Parties will receive notice of hearings.

There will be an opportunity for both parties to present witnesses and other evidence, including: the victim, perpetrator and their witnesses if deemed appropriate by the Title IX Coordinator.

Evidence may be presented if approved by the Title IX Coordinator prior to the hearing. Questioning or evidence about the complainant's prior sexual conduct with anyone other than the alleged perpetrator is prohibited.

Evidence of prior consensual dating or sexual relationship between the parties by itself does not imply consent or preclude a finding of sexual misconduct.

Cross examination is not permitted.

Possible results of the adjudication process:

Sanctions: Restrictions on off-campus school activities, suspension and termination from attendance.

Remedies/accommodations for the victim; If additional remedies are needed for the victim they will be reviewed with the victim prior to adoption or implementation to determine the best course of action.

Additional remedies for the school community: If additional remedies are needed for the school community, they will be reviewed with the school community prior to adoption or implementation.

The parties will be informed of the results of the adjudication;

Written notice to both parties of the outcome of the complaint. There will be no option for appeal.

The school will not require a party to abide by a nondisclosure agreement, in writing or otherwise, that would prevent the re-disclosure of information related to the outcome of the proceeding.

There is no appeal.

PREVENTION AND EDUCATION

VAWA policies are reviewed at each student's orientation. Orientations are held 5 times a year and a student may feel free to repeat an orientation class after giving 1 week prior notice to the director.

TRAINING

The school's employees are trained on a yearly basis by area professionals such as attorneys, sexual misconduct or violence centers, domestic violence centers, local law enforcement professionals and individuals deemed appropriate by the US Department of Education, (when such guidance becomes available).

Revised: sept 24, 2015