

# Campus Security Report

## Including the Drug-Free Campus/Workplace Policy

Irene's Myomassology Institute works to ensure a safe environment for all staff, faculty, students and visitors to the campus. Security cameras are placed in various locations on campus. However, students must also take responsibility in taking extra measures to ensure their own safety:

- Be sure to lock vehicles while they are unattended.
- Do not walk out to the parking lot alone. Walk out with a group.
- Always be aware of your surroundings. Look around you as you walk.
- Have your key ready to unlock or start your vehicle before you reach it.
- If unable to walk out with class members, request an instructor or employee to escort you to your vehicle.
- Lock doors immediately upon entering your vehicle, then start it and leave.

If any crime, violation, or situation occurs, you should **immediately dial 911**, if it is an emergency. If it is not an emergency, the non-emergency number for the Southfield Police is 248-796-5500.

Students, faculty, staff and guests are encouraged to report all crimes, violations, situations and/or incidents that occur on Irene's campus in a timely fashion by completing an **Incident Report**. You may get an Incident Report Form from the Records Desk or see Jeff Laudicina in the Financial Aid Office for help in completing an Incident Report.

Irene's encourages anyone who is the victim of, or witness to, any crime to promptly report the incident to the Southfield Police Department. However, because police reports are public records under state law, Irene's cannot hold these reports of crimes in confidence. Confidential reports, for purposes of inclusion in the annual disclosure, and for the overall general safety and welfare of Irene's campus can be made as stated below. Confidential reports can also be made through Crime Stoppers at 1-800-SPEAK-UP.

Victims or witnesses may report crimes, violations, or situations voluntarily and confidentially using an **Incident Report**. If you are a victim of a crime and do not want to pursue action within Irene's or through the Southfield Police, you may still want to consider filing a **Confidential Incident Report**. The purpose of a **Confidential Incident Report** is to comply with your wish to keep the matter confidential, while taking steps to ensure the future safety of yourself and others. With such information, Irene's can keep an accurate record of the number of incidents involving students, determine whether there is a pattern of crime, and alert the Irene's community for potential danger. Reports filed in this manner are counted and disclosed in the annual crimes statistics for the institution. For more information on how to file a Confidential Incident Report, see Jeff Laudicina in Financial Aid.

In the event that a situation arises on campus, that in the judgment of the Administrative Director constitutes an ongoing or continuing threat, a campus wide "emergency notification" or a "timely warning" will be issued. The notification and/or warning will be issued through the students and staff members text messages on their cell phones. Students are told how to sign up and do so during orientation class as a group. To sign-up, text "**Follow Irenesnews**" to **40404** on any cell phone. The initial text message would be followed up with a bulletin, distributed to students and posted on our website, giving more information when necessary. If you change your cell phone number, please remember to complete the sign-up process with your new phone. For more information about what situations constitute an "emergency notification" and/or "timely warning", contact Jeff Laudicina in the Financial Aid Office.

### IRENE'S MYOMASSOLOGY INSTITUTE SEXUAL HARASSMENT POLICIES & GRIEVANCE PROCEDURES

#### 1. Introduction

Irene's Myomassology Institute (the "School") is committed to providing a working and educational environment for all students, faculty and staff that is free from discrimination, including sexual harassment. Every member of the

School community should be aware that the School is strongly opposed to sexual harassment, and that such behavior is prohibited by state and federal laws.

The School does not discriminate on the basis of sex in its educational, extracurricular, or other programs or in the context of employment. Sex discrimination is prohibited by Title IX of the Education Amendments of 1972, a federal law that provides:

*No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.*

As part of the School's commitment to providing a working and learning environment free from sexual harassment, this Policy shall be disseminated widely to the School community through publications, the School website, new employee orientations, student orientations, and other appropriate channels of communication. The School provides training to key staff members to enable the School to appropriately handle any allegations of sexual harassment promptly and effectively. The School will respond to all reports of sexual harassment, and will take appropriate action to prevent, correct, and if necessary, discipline behavior that violates the Policy.

## **2. Scope of the Policy**

This Policy governs sexual harassment that occurs in the School's education programs or activities. This Policy applies to all students, employees, and third parties conducting business with the School, regardless of the person's gender, gender identity, sexual orientation, age, race, nationality, class status, ability, religion or other protected status. The School encourages victims of sexual harassment to talk to someone about what happened so victims can get the support they need, and the School can respond appropriately. As further described in this Policy, the School will seek to respect a victim's request for confidentiality to the extent possible, while remaining ever mindful of the victim's well-being.

## **3. Prohibited Conduct**

Sexual harassment comprises a broad range of behaviors focused on sex that may or may not be sexual in nature. Sexual harassment includes unwelcome sexual conduct. Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the School's education programs or activities also constitutes sexual harassment. Sexual assault, stalking, domestic violence, and dating violence are all forms of sexual harassment. Retaliation following an incident of alleged sexual harassment or attempted sexual harassment is strictly prohibited. The definitions for specific acts of sexual harassment can be found in the Definitions of Key Terms at the end of this Policy statement.

Sexual harassment can occur between strangers or acquaintances, or people who know each other well, including between people involved in an intimate or sexual relationship, can be committed by anyone regardless of gender identity, and can occur between people of the same or different sex or gender. **This Policy prohibits all forms of sexual harassment.**

## **4. Options for Assistance Following an Incident of Sexual Harassment**

The School strongly encourages any victim of sexual harassment to seek immediate assistance. Seeking prompt assistance may be important to ensure a victim's physical safety or to obtain medical care. The School strongly advocates that a victim of sexual harassment report the incident in a timely manner. Time is a critical factor for evidence collection and preservation.

### **Reporting Incidents of Sexual Harassment**

Victims of sexual harassment may file a report with the Southfield Police Department. Victims may also file a report with any faculty or staff member to be delivered to the School's Title IX Coordinator. More information about reporting an incident of sexual harassment can be found in Section 6 of this Policy, below.

The School will respond promptly when it has actual knowledge of sexual harassment in its education programs or activities. The Title IX Coordinator will promptly contact the complainant to discuss the availability of supportive measures as described below, consider the complainant's wishes with respect to supportive measures, inform the

complainant of the availability of supportive measures with or without the filing of a formal complaint, and explain to the complainant the process for filing a formal complaint. The School will also provide the complainant with written notification about assistance available both within and outside of the School community.

A complainant may choose for the investigation to be pursued through the criminal justice system and/or through the School's disciplinary procedures by filing a formal complaint as described in this Policy. The School and the criminal justice system work independently from each other. Law enforcement officers do not determine whether a violation of this Policy has occurred. The Title IX Coordinator will guide the complainant through the available options and support the complainant in his or her decision.

### **Supportive Measures**

The School's Title IX Coordinator will work with all students affected by sexual harassment to ensure their safety and support their wellbeing. This assistance may include providing supportive measures to support or protect a student after an incident of sexual harassment and while an investigation or disciplinary proceeding is pending. Supportive measures are non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the complainant or the respondent before or after the filing of a formal complaint or where no formal complaint has been filed. Such measures are designed to restore or preserve equal access to the School's education programs and activities including measures designed to protect the safety of all parties or the School's educational environment, or deter sexual harassment, without unreasonably burdening the other party. The School will maintain as confidential any supportive measures provided to the complainant or respondent, to the extent that maintaining such confidentiality would not impair the ability of the School to provide the supportive measures. The Title IX Coordinator is responsible for coordinating the effective implementation of supportive measures.

Supportive measures may include:

- counseling,
- extensions of deadlines or other course-related adjustments,
- modifications of class schedules,
- campus escort services,
- mutual restrictions on contact between the parties,
- leaves of absence,
- increased security and monitoring of certain areas of campus, or
- other similar measures.

The measures needed by a student may change over time, and the Title IX Coordinator will communicate with student(s) throughout any investigation to ensure that any supportive measures are necessary and effective based on the students' evolving needs. Students who report an incident of sexual harassment may also be able to obtain a formal protection order from a civil or criminal court. The School will work with the student and the applicable court to assist in the enforcement of any such protective orders.

### **Support Services Available**

Counseling, advocacy and support services are available through various resources for complainants, whether or not a complainant chooses to make an official report or participate in the School's disciplinary or criminal process. *Irene's Myomassology Institute does not provide counseling or health care services.*

Sexual harassment crisis and counseling options are available locally and nationally through a number of agencies, including:

#### National Resources:

**Breathe Network** <http://www.thebreathenetwork.org>

**Anti-Violence Project** 212-714-1141 <http://www.antiviolenceproject.org>

**Love Is Respect** 866-331-9474 <http://www.loveisrespect.org>

**The National Center for Victims of Crime** 855-484-2846 [www.victimsofcrime.org](http://www.victimsofcrime.org)

**The National Domestic Violence Hotline** 800-799-7233 <http://www.thehotline.org>

**The Rape, Abuse, & Incest National Network (RAINN)** 1-800-656-4673 [www.rainn.org](http://www.rainn.org)  
**National Sexual Violence Resource Center** [www.nsvrc.org](http://www.nsvrc.org)

Local Resources:

**Haven:** 248-334-1284; <https://www.haven-oakland.org/programs/support-groups>

**Common Ground:** 800-231-1127 <https://commongroundhelps.org>

**Southfield Police:** 248-796-5500 <https://www.cityofsouthfield.com/LZ/PoliceDepartment/tabid/200/Default.aspx>

### **Evidence Preservation**

Victims of sexual assault, domestic violence or dating violence should consider seeking medical attention as soon as possible. It is important that a victim of sexual assault not bathe, douche, smoke, change clothing or clean the bed/linen where they were assaulted so that evidence necessary to prove criminal activity may be preserved. In circumstances where the victims do not opt for forensic evidence collection, health care providers can still treat injuries and take steps to address health concerns. Victims of sexual harassment are encouraged to also preserve evidence by saving text messages, instant messages, social networking pages, other communications, and keeping pictures, logs or other copies of documents, if they have any, that would be useful in connection with a School or police investigation.

### **5. Title IX Coordinator**

The School's Title IX Coordinator is responsible for monitoring and overseeing the School's compliance with Title IX and the prevention of sexual harassment and discrimination. The Title IX Coordinator is:

- Knowledgeable and trained in School policies and procedures and relevant state and federal laws;
- Available to advise any individual, including a complainant, respondent, or a third party, about School and community resources and reporting options;
- Available to provide assistance to any School employee regarding how to respond appropriately to a report of Title IX-related prohibited conduct and related retaliation;
- Participates in ensuring the effective implementation of this Policy, including monitoring compliance with all procedural requirements, record keeping, and timeframes; and
- Responsible for overseeing training, prevention, educational efforts and reviews of School culture.

Inquiries or concerns about Title IX may be referred to the School's Title IX Coordinator:

**Jennifer Smith, Career Services Director**

26061 Franklin Road  
Southfield, Michigan 48033  
Phone (248) 350-1400  
Email: [jennifer@irenes.edu](mailto:jennifer@irenes.edu)

### **6. Reporting Policies and Protocols**

Irene's Myomassology Institute strongly encourages all members of the School community to report information about any incident of sexual harassment as soon as possible. Reports can be made either to the School and/or to law enforcement.

#### **Reporting to the School**

An incident of sexual harassment must be delivered to the School's Title IX Coordinator or to a designated School official. No other School officials or employees have the authority to institute corrective measures under these Policies and Procedures on behalf of the School.

**The School will not be deemed to have actual knowledge of alleged sexual harassment unless the School's Title IX Coordinator or a designated School official possess such knowledge.** Reports of sexual harassment to School officials or employees other than the Title IX Coordinator or a designated School official will not confer actual knowledge to the School of such allegations, unless the Title IX Coordinator or designated School official subsequently obtain such actual knowledge.

If the School's Title IX Coordinator is the alleged perpetrator of the sexual harassment, the report should be submitted to a designated School official. Filing a report with a School official will not obligate the victim to prosecute, nor will it subject the victim to scrutiny or judgmental opinions from officers.

Any person may report sex discrimination, including sexual harassment (whether or not the person reporting is the person alleged to be the victim of conduct that could constitute sex discrimination or sexual harassment), in person, by mail, by telephone, or by electronic mail, using the contact information listed in Section 5 for the Title IX Coordinator, or by any other means that results in the Title IX Coordinator or designated School official receiving the person's verbal or written report. Such a report may be made at any time (including during non-business hours) by using the telephone number or email address, or by mail to the office address, listed for the Title IX Coordinator.

While there is no time limit for reporting, reports of sex discrimination or harassment should be brought forward as soon as possible. All incidents should be reported even if significant time has elapsed, but prompt reporting will better enable the School to respond, investigate, provide an appropriate remedy, and impose discipline if appropriate. Note that if a complainant seeks to file a formal complaint for the School to initiate an investigation into allegations of sexual harassment, the complainant must be participating in or attempting to participate in the School's education programs or activities at the time of filing such formal complaint. The School is committed to supporting the rights of a person reporting an incident of sexual harassment to make an informed choice among options and services available.

The School will respond to all reports in a manner that treats each individual with dignity and respect and will take prompt responsive action to end any harassment, prevent its recurrence, and address its effects.

### **Reporting to Law Enforcement**

An incident of sexual harassment can be reported to law enforcement at any time, 24 hours a day/7 days a week, by calling 911. At the complainant's request, the School will assist the complainant in contacting law enforcement. If the complainant decides to pursue the criminal process, the School will cooperate with law enforcement agencies to the extent permitted by law. A complainant has the option to decide whether or not to participate in any investigation conducted by law enforcement. Filing a police report will:

- Ensure that a victim of sexual assault receives the necessary medical treatment and tests
- 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)

### **Reporting of Crimes & Annual Security Reports**

Campus safety and security are important issues at Irene's Myomassology Institute. Our goal is to provide students with a safe environment in which to learn and to keep students, parents, and employees well informed about campus security. The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, or Clery Act, requires institutions of higher education to record and report certain information about campus safety, including the number of incidents of certain crimes on or near campus, some of which constitute sexual harassment under this Policy.

Each year the School prepares an annual security report to comply with the Clery Act. The full text of this report can be located on the School's web site at [www.irenes.edu](http://www.irenes.edu). This report is prepared in cooperation with the local law enforcement agencies around our campus. Each year notification is made to all enrolled students and employees that provides the web site to access this report. Copies of the report may also be obtained in person from the Financial Aid Director or by calling (248) 350-1400. All prospective employees may also obtain a copy from the Financial Aid Director.

### **Timely Warnings**

In the event that a situation arises, either on or off campus, that, in the judgment of the Executive Director constitutes an ongoing or continuing threat, a campus wide "timely warning" will be issued. The Executive Director will immediately notify the School community upon the confirmation of a significant emergency or dangerous

situation involving an immediate threat to the health or safety of students or staff occurring at the School, unless issuing a notification will compromise efforts to contain the emergency. The warning will be issued through the most effective and efficient means available and may include instant messaging to students and School employees. Notices may also be posted in the common areas throughout the School. Anyone with information warranting a timely warning should report the circumstances to the Executive Director by phone at (248) 350-1400 or in person at the School. The School will provide adequate follow-up information to the community as needed.

### **Third-Party and Anonymous Reporting**

In cases where sexual harassment is reported to the Title IX Coordinator or a designated School official by someone other than the complainant (by an instructor, classmate, or friend, for example), the Title IX Coordinator will promptly notify the complainant that a report has been received. This Policy and the Procedures will apply in the same manner as if the complainant had made the initial report. The Title IX Coordinator will make every effort to meet with the complainant to discuss available options and resources. Reports from an anonymous source will be treated in a similar fashion.

### **No Retaliation**

The School prohibits retaliation against any individual for the purpose of interfering with any right or privilege secured by Title IX, or because the individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in a Title IX investigation, proceeding, or hearing. The School will take strong responsive action if retaliation occurs. Any incident of retaliation should be promptly reported to the Title IX Coordinator or the designated school official.

Except as may otherwise be required by law, the School will keep confidential the identity of any individual who has made a report or complaint of sex discrimination, including any complainant, any individual who has been reported to be the perpetrator of sex discrimination, any respondent, and any witness.

Charging an individual with a violation of the School's code of conduct for making a materially false statement in bad faith in the course of a grievance proceeding does not constitute retaliation, provided, however, that a determination regarding responsibility, alone, is not sufficient to conclude that any party made a materially false statement in bad faith.

### **Coordination With Drug Free School Policy**

Students may be reluctant to report instances of sexual harassment because they fear being disciplined pursuant to the School's alcohol or drug policies. The School encourages students to report all instances of sexual harassment and will take into consideration the importance of reporting sexual harassment in addressing violations of the School's alcohol and drug policies. This means that, whenever possible, the School will respond educationally rather than punitively to student alcohol or drug policy violations associated with reported sexual harassment.

## **7. School Policy on Confidentiality**

The School encourages victims of sexual harassment to talk to somebody about what happened – so victims can get the support they need, and so the School can respond appropriately.

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 harassment. The School encourages victims to talk to someone identified in one or more of these groups.

### **Privileged and Confidential Communications – Professional & Pastoral Counselors**

Professional, licensed counselors and pastoral counselors who provide mental-health counseling to members of the 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. *The School does not provide professional or pastoral counseling, but can assist a victim of sexual harassment in obtaining support services from these groups or agencies.* Contact information for these support organizations is listed in Section 4 of this Policy.

**NOTE:** While these professional and pastoral counselors and advocates may maintain a victim's confidentiality vis-

à-vis the School, they may have reporting or other obligations under state law.

**ALSO NOTE:** If the School determines that the alleged perpetrator(s) pose a serious and immediate threat to the School community, the Executive Director 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 a Designated School Official**

A “designated school official” is a School employee who has the authority to institute corrective measures on behalf of the School upon actual notice of sexual harassment.

A designated school official will report to the Title IX Coordinator all relevant details about the alleged sexual harassment shared by the complainant – including the names of the complainant and respondent, 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 designated school official will be shared only with people responsible for handling the School’s response to the report. Designated school officials should not share information with law enforcement without the complainant’s consent or unless the complainant has also reported the incident to law enforcement.

In addition to the Title IX Coordinator, the School’s designated school officials include the School’s Financial Aid Director, who serves as the Deputy Title IX Coordinator, and the School’s Executive Director.

Before a complainant reveals any information to a designated school official, the official should ensure that the complainant understands the official’s reporting obligations – and, if the complainant wants to maintain confidentiality, direct the complainant to confidential resources.

If the complainant wants to tell the designated school official what happened but also maintain confidentiality, the official should tell the complainant that the School will consider the request but cannot guarantee that the school will be able to honor it. In reporting the details of the incident to the Title IX Coordinator, the official will also inform the Coordinator of the complainant’s request for confidentiality.

Designated school officials will not pressure a complainant to request confidentiality, but will honor and support the complainant’s wishes, including for the School to fully investigate an incident. By the same token, designated school officials will not pressure a complainant to make a formal complaint and initiate a School investigation if the complainant is not ready to do so.

A complainant who at first requests confidentiality may later decide to file a formal complaint with the School or report the incident to local law enforcement, and thus have the incident fully investigated.

### **Reporting to Title IX Coordinator**

To the extent possible, information reported to the Title IX Coordinator will be shared only with people responsible for handling the School’s response to the report. The Title IX Coordinator should not share information with law enforcement without the complainant’s consent or unless the complainant has also reported the incident to law enforcement.

Before a complainant reveals information to the Title IX Coordinator, the Coordinator will ensure that the complainant understands the Coordinator’s reporting obligations – and, if the complainant wants to maintain confidentiality, direct the complainant to confidential resources. If the complainant wants to tell the Title IX Coordinator what happened but also maintain confidentiality, the Coordinator should tell the complainant that the School will consider the request but cannot guarantee that the School will be able to honor it.

The Title IX Coordinator will not pressure a complainant to request confidentiality, but will honor and support the complainant’s wishes, including for the School to fully investigate an incident. By the same token, the Title IX

Coordinator will not pressure a complainant to make a formal complaint and initiate a School investigation if the complainant is not ready to do so.

**Requesting Confidentiality: How the School Will Weigh the Request and Respond**

If a complainant discloses an incident to the Title IX Coordinator but wishes to maintain confidentiality or requests that no investigation into a particular incident be conducted or disciplinary action taken, the School must weigh that request against the School's obligation to provide a safe, non-discriminatory environment for all students, including the complainant.

If the School honors the request for confidentiality, a complainant must understand that the School's ability to investigate the incident and pursue disciplinary action against the respondent will be limited. A complainant may provide the Title IX Coordinator with confidential knowledge of alleged sexual harassment and receive supportive measures from the School without the complainant filing a formal complaint and initiating an investigation. Although rare, there are times when the School may not be able to honor a complainant's request in order to provide a safe, non-discriminatory environment for all students.

The Title IX Coordinator will evaluate requests for confidentiality. When weighing a complainant's request for confidentiality or that no investigation or discipline be pursued, the Title IX Coordinator will consider a range of factors, including the following:

- The increased risk that the respondent will commit additional acts of sexual harassment or other violence, such as:
  - whether there have been other sexual harassment complaints about the same respondent;
  - whether the respondent has a history of arrests or records from a prior school indicating a history of violence;
  - whether the respondent threatened further sexual harassment or other violence against the complainant or others;
  - whether the sexual harassment was committed by multiple respondents;
- Whether the sexual harassment was perpetrated with a weapon;
- Whether the complainant is a minor;
- Whether the School possesses other means to obtain relevant evidence of the sexual harassment (e.g., security cameras or personnel, physical evidence); and
- Whether the complainant's report reveals a pattern of perpetration (e.g., 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 Title IX Coordinator to file a formal complaint to investigate and, if appropriate, pursue disciplinary action. If none of these factors are present, the School will likely respect the complainant's request for confidentiality.

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

- Assist the complainant in accessing other available victim advocacy, academic support, counseling, disability, health or mental health services, and legal assistance;
- Provide other security and support, which could include issuing a no-contact order, helping arrange a change of course schedules (including for the respondent pending the outcome of an investigation), or adjustments for assignments or tests; and
- Inform the complainant of the right to report a crime to local law enforcement – and provide the complainant with assistance if the complainant wishes to do so.

The School may not require a complainant to participate in any investigation or disciplinary proceeding.

Because the School is under a continuing obligation to address the issue of sexual harassment campus-wide, reports of sexual harassment (including non-identifying reports) will also prompt the School to consider broader remedial action – such as increased monitoring, supervision, or security at locations where the reported sexual harassment 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 complainant's request for confidentiality**, the School will also take immediate action as necessary to protect and assist the complainant. This includes the Title IX Coordinator promptly contacting the complainant to discuss the availability of supportive measures. A complainant's request for confidentiality will limit the School's ability to investigate a particular matter. The School may take steps to limit the effects of the alleged sexual harassment and prevent its recurrence without initiating formal action against the respondent or revealing the identity of the student complainant. Examples include: providing increased monitoring, supervision, or security at locations or activities where the harassment occurred; providing training and education materials for students and employees; revising and publicizing the School's policies on sexual harassment; and conducting climate surveys regarding sexual harassment.

#### **Off-campus Counselors and Advocates**

Off-campus counselors, advocates, and health care providers will also generally maintain confidentiality and not share information with the School unless the complainant requests the disclosure and signs a consent or waiver form. Contact information for these off-campus resources can be found in Section 4 of this Policy.

#### **8. Formal Complaint Investigation Procedures and Protocols**

The School will investigate all formal complaints of sexual harassment. A formal complaint must be in writing filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that the School investigate the allegation of sexual harassment. A formal complaint form may be obtained from the Title IX Coordinator, although no particular form is required to submit a formal complaint so long as the complaint is in writing, signed by a complainant, alleges sexual harassment against a respondent, and requests an investigation. The School's Title IX Coordinator oversees the School's investigation, response to, and resolution of all reports of prohibited sexual harassment, and of related retaliation, involving students, faculty, and staff.

As soon as practicable after receiving a formal complaint, the Title IX Coordinator will make an initial assessment of the formal complaint to determine whether the formal complaint, on its face, alleges an act prohibited by this Policy. If the Title IX Coordinator determines the formal complaint states facts which, if true, could constitute sexual harassment in violation of this Policy, the Title IX Coordinator will proceed through the formal investigation process (see below). If the Title IX Coordinator determines the complainant's report does not state facts that, if true, could constitute a violation of this Policy, the Title IX Coordinator will communicate this determination in writing to the complainant. In such circumstances the complainant may still file a report with the federal Office for Civil Rights, the police, or seek available civil remedies through the judicial system. The complainant may also re-file the report with the School upon discovery of additional facts.

The School will dismiss a formal complaint if the conduct alleged in the formal complaint would not constitute sexual harassment under Title IX even if proved, did not occur in the School's education program or activity, or did not occur against a person in the United States. ***Such dismissal does not preclude action under another provision of the School's code of conduct.*** The School may dismiss the formal complaint if a complainant notifies the Title IX Coordinator in writing that the complainant would like to withdraw the formal complaint; the respondent is no longer enrolled or employed by the School; or specific circumstances prevent the School from gathering evidence sufficient to reach a determination as to the formal complaint or allegations therein. The School will promptly send written notice of the dismissal and reasons therefor simultaneously to the parties.

#### **Notice**

Upon receipt of a formal complaint, the School will provide written notice of the School's grievance process to known parties. The School will also provide the parties with notice of the allegations of sexual harassment potentially constituting sexual harassment, including sufficient details known at the time and with sufficient time to

prepare a response before any initial interview. Sufficient details include the identities of the parties involved in the incident, if known; the conduct allegedly constituting sexual harassment; and the date and location of the alleged incident, if known. The written notice will include a statement that the respondent is presumed not responsible for the alleged conduct and that a determination regarding responsibility is made at the conclusion of the grievance process. The written notice will inform the parties that they may have an advisor of their choice, who may be, but is not required to be, an attorney, and may inspect and review evidence that is submitted to and/or collected by the School in connection with the investigation. The written notice will also inform the parties of any provision in the School's code of conduct that prohibits knowingly making false statements or knowingly submitting false information during the grievance process.

If, in the course of an investigation, the School decides to investigate allegations about the complainant or respondent that are not included in a prior notice provided to the parties, the School will provide notice of the additional allegations to the parties whose identities are known.

### **Voluntary Resolution**

Voluntary resolution, when selected by all parties and deemed appropriate by the Title IX Coordinator, is a path designed to eliminate the conduct at issue, prevent its recurrence, and remedy its effects in a manner that meets the safety and welfare needs of the School community. If all parties voluntarily agree to participate in an informal resolution that does not involve a full investigation and adjudication after receiving notice of a formal complaint, and if the School determines that the particular formal complaint is appropriate for such a process, the School will facilitate an informal resolution to assist the parties in reaching a voluntary resolution. The School retains the discretion to determine which cases are appropriate for voluntary resolution.

Voluntary resolution may include: conducting targeted or broad-based educational programming or training for relevant individuals or groups; providing increased supervision or security at locations or activities where the harassment occurred; facilitating a meeting with the respondent and the complainant present; and any other remedy that can be tailored to the involved individuals to achieve the goals of the Policy.

Voluntary resolution may also include restorative principles that are designed to allow a respondent to accept responsibility for harassment and acknowledge harm to the complainant or to the School community. Restorative models will be used only with the consent of both parties and following a determination by the Title IX Coordinator that the matter is appropriate for a restorative approach.

The School will not compel parties to engage in mediation or to participate in any particular form of informal resolution. As the title implies, participation in voluntary resolution is a choice, and either party can request to end this manner of resolution and pursue an investigation and adjudication at any time, including if voluntary resolution is unsuccessful at resolving the complaint.

In connection with any informal resolution process, the School will provide written notice to the parties disclosing the allegations and the requirements of the informal resolution process. The School will notify the parties that any time prior to agreeing to a resolution, any party has the right to withdraw from the informal resolution process and resume the grievance process with respect to the formal complaint. The School must obtain the parties' voluntary, written consent to the informal resolution process. The informal resolution process may not be utilized to resolve allegations that a School employee sexually harassed a student.

The time frame for completion of voluntary resolution may vary, but the School will seek to complete the process within 15 days of all the parties' request for voluntary resolution.

### **Formal Investigation Process**

The burden of proof and the burden of gathering evidence sufficient to reach a determination regarding responsibility rests on the School and not on the parties. The Title IX Coordinator is responsible for the investigation of a formal complaint. The Title IX Coordinator may designate a specially trained investigator (or team of investigators) to conduct the investigation.

The School's process for responding to, investigating, and adjudicating sexual harassment reports will continue during any law enforcement proceeding. The investigator may need to temporarily delay an investigation while the police are gathering evidence but will resume the investigation after learning that the police department has completed its evidence-gathering and will generally not wait for the conclusion of any related criminal proceeding.

The investigator will interview the complainant, respondent, and any witnesses. They will also gather pertinent documentary materials (if any) and other information. The School will provide, to a party whose participation is invited or expected, written notice of the date, time, location, participants, and purpose of all hearings, investigative interviews, or other meetings, with sufficient time for the party to prepare to participate. Each party shall have an equal opportunity to present witnesses, including fact and expert witnesses, and other inculpatory and exculpatory evidence. The School will not restrict the ability of either party to discuss the allegations under investigation or to gather and present relevant evidence.

### **Time Frame for Investigation**

Consistent with the goal to maximize educational opportunities and minimize the disruptive nature of the investigation and resolution, the Title IX Coordinator seeks to resolve all reports in a timely manner. In general, an investigation may last up to 30 days, from receipt of a formal complaint from the complainant or the Title IX Coordinator of the request to proceed with an investigation. Adjudication will generally take up to 30 days from the date the investigative report is provided to both the complainant and the respondent. The Title IX Coordinator may set reasonable time frames for required actions under the Policy. Those time frames may be extended for good cause as necessary to ensure the integrity and completeness of the investigation, comply with a request by external law enforcement, accommodate the availability of witnesses, accommodate absences or delays by the parties, the need for language assistance or accommodation of disabilities, account for School breaks or vacations, or address other legitimate reasons, including the complexity of the investigation (including the number of witnesses and volume of information provided by the parties) and the severity and extent of the alleged conduct. Any extension of the timeframes, and the reason for the extension, will be shared simultaneously with the parties in writing. Best efforts will be made to complete the process in a timely manner by balancing principles of thoroughness and fundamental fairness with promptness.

Where necessary, the School will take prompt steps to protect complainants pending the final outcome of an investigation, including the provision of supportive measures to the complainant and/or the respondent. The School may remove a respondent from the School's education programs or activities on an emergency basis, provided that the School undertakes an individualized safety and risk analysis, determines that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of sexual harassment justifies removal, and provides the respondent with notice and an opportunity to challenge the decision immediately following the removal. The School may place a non-student employee respondent on administrative leave during the pendency of a grievance process.

The School will provide both parties an equal opportunity to inspect and review any evidence obtained as part of the investigation that is directly related to the allegations raised in the formal complaint, including the evidence upon which the School does not intend to rely in reaching a determination regarding responsibility and inculpatory or exculpatory evidence, whether obtained from a party or other source, so that each party can meaningfully respond to the evidence prior to conclusion of the investigation. Prior to completion of the investigative report, the School will send to each party and the party's advisor, if any, the evidence subject to inspection and review in an electronic format or a hard copy, and the parties will have at least 10 days to submit a written response, which the investigator will consider prior to completion of the investigative report. The School will make all such evidence subject to the parties' inspection and review available at any hearing to give each party equal opportunity to refer to such evidence during the hearing, including for purposes of cross-examination.

### **Investigation Report**

The investigator will prepare an investigative report that fairly summarizes relevant evidence and, at least 10 days prior to a hearing, send to each party and the party's advisor, if any, the investigative report in an electronic format or a hard copy, for their review and written response. Such report will include a statement of the allegations and issues, the positions of the complainant and respondent, a summary of the evidence (including from interviews and

documentation gathered), an explanation why any proffered evidence was not investigated, assessment of individual credibility, findings of fact, and an analysis of whether a violation of the Policy has occurred. The investigator will use “preponderance of the evidence” as the standard of proof to determine whether a violation of the Policy occurred. Preponderance of the evidence means that the investigator must be convinced based on the information it considers that the respondent was more likely than not to have engaged in the conduct at issue in order to find the respondent responsible for violating the Policy. The complainant and respondent will be simultaneously notified of the completion of the investigation and provided with the investigator’s report.

## **9. Grievance/Adjudication Procedures**

### **Hearing Panel**

The School will convene a hearing panel following the end of the investigation. The hearing panel determines whether the respondent is responsible or not responsible for a violation of the Policy. The hearing panel will consist of three members. The Title IX Coordinator will designate the members of the hearing panel but will not serve as a panel member. The investigator responsible for the School’s investigation of the formal complaint may not serve as a panel member. The hearing panel members may include administrators, officers, lawyers, or other individuals with relevant experience and special training. Panel members may participate remotely so long as the School utilizes technology enabling the panel members and parties to simultaneously see and hear the party or witness answering questions. All panelists will receive training from experts in the field at least once a year. In addition to training on how the adjudicatory process works, the training will include specific instruction about how to approach students about sensitive issues that may arise in the context of sexual harassment. The complainant and respondent will be informed of the panel’s membership before the hearing process begins. A complainant and/or respondent may challenge the participation of a panel member because of perceived conflict of interest, bias, or prejudice. Such challenges, including rationale, must be made to the Title IX Coordinator at least three days prior to the commencement of the hearing. At its discretion, the Title IX Coordinator will determine whether such a conflict of interest exists and whether a panel member should be replaced. Postponement of a hearing may occur if a replacement panelist cannot be immediately identified.

### **Advisors**

Both the complainant and the respondent are entitled to be accompanied to any meeting or proceeding relating to the allegation of sexual harassment by an advisor or support person of their choice, provided the involvement of such advisor or support person does not result in the postponement or delay of such meeting as scheduled.

### **Written Submissions**

Both the complainant and respondent will have the opportunity to submit written responses to the investigation report and other relevant information to the hearing panel. Each of the complainant and respondent will have the opportunity to review any written submissions by the other. The hearing panel may set reasonable parameters for these written submissions. The hearing panel will review the investigation report and written submissions.

### **Hearing Procedures**

The Title IX Coordinator will give the complainant and respondent at least 10 calendar days’ advance notice of the hearing. The Title IX Coordinator may arrange to hold the hearing at an off-campus location. The hearing is a closed proceeding, meaning that no one other than the panel members, the complainant and respondent, their respective advisors, witnesses (when called), and necessary School personnel may be present during the proceeding. The Executive Director will work with School staff so that any student whose presence is required may participate in the hearing.

In general, hearings will proceed as follows:

- The Title IX Coordinator may set reasonable time limits for any part of the hearing. Each of the complainant and respondent will have the opportunity to present witnesses and other information consistent with the Policy and these Procedures. The panel may determine the relevance of, place restrictions on, or exclude any witnesses or information. When the complainant and respondent are not able to be present for the hearing panel, arrangements will be made for participation virtually, with technology enabling the participants to see and hear each other simultaneously.
- In cases where either the complainant or respondent opts not to participate in the hearing, the panel may still hear from the other.
- Additional hearing rules include:
  - Cross Examination. At the hearing, the hearing panel shall permit each party's advisor to ask the other party and any witnesses all relevant questions and follow-up questions, including those challenging credibility. Such cross-examination at the live hearing must be conducted directly, orally, and in real time by the party's advisor of choice and never by a party personally.
  - At the request of either party, the School will provide for the hearing to occur with the parties located in separate rooms with technology enabling the hearing panel members and parties to simultaneously see and hear the party or the witness answering questions.
  - Only relevant cross-examination and other questions may be asked of a party or witness. Before a complainant, respondent, or witness answers a cross-examination or other question, the hearing panel must first determine whether the question is relevant and explain any decision to exclude a question as not relevant.
  - If a party does not have an advisor present at the live hearing, the School will provide without fee or charge to that party, an advisor of the School's choice, who may be, but is not required to be, an attorney, to conduct cross-examination on behalf of that party.
  - Information Regarding Romantic or Sexual History. Questions and evidence about the complainant's sexual predisposition or prior sexual behavior are not relevant, unless such questions and evidence about the complainant's prior sexual behavior are offered to prove that someone other than the respondent committed the conduct alleged by the complainant, or if the questions and evidence concern specific incidents of the complainant's prior sexual behavior with respect to the respondent and are offered to prove consent. The existence of a prior consensual dating or sexual relationship between the complainant and respondent by itself does not support an inference of consent to alleged sexual harassment.
  - Prior Conduct Violations. The hearing panel will not consider the respondent's prior conduct violations, unless the investigator provided that information to the hearing panel because the respondent was previously found responsible, and the previous incident was substantially similar to the present allegation(s) and/or the information indicates a pattern of behavior by the respondent.
  - If a party or witness does not submit to cross-examination at live hearing, the hearing panel may rely on any statement of that party or witness in reaching a determination regarding responsibility; however, the hearing panel will not draw an inference about the determination regarding responsibility based solely on a party's or witness's absence from the hearing or refusal to answer cross-examination or other questions.
  - The School will not require, allow, rely upon, or otherwise use questions or evidence that constitute, or seek disclosure of, information protected under a legally recognized privilege, unless the person holding such privilege has waived the privilege.
  - Live hearings may be conducted with all parties physically present in the same geographic location or, at the School's discretion, any or all parties, witnesses, and other participants may appear at the live hearing virtually, with technology enabling participants to see and hear each other simultaneously.

The School will create an audio or audiovisual recording, or transcript, of any hearing and make it available to the parties for inspection and review. The panelists may request a copy or transcript of the recording. Cell phones and recording devices may not be used in the hearing room(s) unless approved by the panel in advance.

#### **Panel Determinations/Standard of Proof**

The hearing panel will issue a written determination regarding responsibility. The panel will use "preponderance of the evidence" as the standard of proof to determine whether a violation of the Policy occurred. Preponderance of

the evidence means that a panel must be convinced based on the information it considers that the respondent was more likely than not to have engaged in the conduct at issue in order to find the respondent responsible for violating the Policy. The panel will find a student responsible, or not responsible, based on a majority vote. The panel will generally render a written determination within 10 calendar days after the conclusion of a hearing.

The panel's written determination will include:

1. Identification of the allegations potentially constituting sexual harassment;
2. A description of the procedural steps taken from the receipt of the formal complaint through the determination, including any notifications to the parties, interviews with parties and witnesses, site visits, methods used to gather other evidence, and hearings held;
3. Findings of fact supporting the determination;
4. Conclusions regarding the application of the School's code of conduct to the facts;
5. A statement of, and rationale for, the result as to each allegation, including a determination regarding responsibility, any disciplinary sanctions the School imposes on the respondent, and whether remedies designed to restore or preserve equal access to the School's education program or activity will be provided by the School to the complainant; and
6. The School's procedures and permissible bases for the complainant and respondent to appeal.

The parties will be informed of the results of the adjudication hearing by simultaneous written notice to both parties of the outcome of the formal complaint. The determination regarding responsibility becomes final either on the date that the School provides the parties with the written determination of the result of the appeal, if an appeal is filed, or if an appeal is not filed, the date on which an appeal would no longer be considered timely.

#### **10. Sanctions and Other Remedies**

The hearing panel shall be responsible for imposing sanctions that are:

- Fair and appropriate given the facts of the particular case;
- Consistent with the School's handling of similar cases;
- Adequate to protect the safety of the campus community; and
- Reflective of the seriousness of sexual harassment.

No disciplinary sanctions or other actions that are not supportive measures will be imposed against a respondent until the completion of the School's grievance procedures, including any applicable appeal.

The hearing panel will consider relevant factors, including if applicable: (1) the specific sexual harassment at issue (such as penetration, touching under clothing, touching over clothing, unauthorized recording, etc.); (2) the circumstances accompanying the lack of consent (such as force, threat, coercion, intentional incapacitation, etc.); (3) the respondent's state of mind (intentional, knowing, bias-motivated, reckless, negligent, etc.); (4) the impact of the offense on the complainant; (5) the respondent's prior disciplinary history; (6) the safety of the School community; and (7) the respondent's conduct during the disciplinary process. The sanctioning decision will be communicated in writing to the complainant and the respondent as part of the hearing panel's written determination.

The School may impose any one or more of the following sanctions on a student determined to have violated the Policy:

- Reprimand/warning;
- Changing the respondent's academic schedule;
- Disciplinary probation;
- Restricting access to School facilities or activities;
- Community service;
- Issuing a "no contact" order to the respondent or requiring that such an order remain in place;
- Dismissal or restriction from School employment;
- Suspension (limited time or indefinite); and
- Expulsion.

In addition to any other sanction (except where the sanction is expulsion), the School may require any student

determined to be responsible for a violation of the Policy to receive appropriate education and/or training related to the sexual harassment violation at issue. The School may also recommend counseling or other support services for the student.

Whatever the outcome of the hearing process, a complainant may request ongoing or additional supportive measures and the Title IX Coordinator will determine whether such supportive measures are appropriate. Potential ongoing supportive measures include:

- Providing an escort for the complainant;
- Changing the complainant's academic schedule;
- Allowing the complainant to withdraw from or retake a class without penalty; and
- Providing access to tutoring or other academic support, such as extra time to complete or re-take a class.

The School may also determine that additional measures are appropriate to respond to the incident on the School community. Additional responses for the benefit of the School community may include:

- Increased monitoring, supervision, or security at locations or activities where the harassment occurred;
- Additional training and educational materials for students and employees;
- Revision of the School's policies relating to sexual harassment; and
- Climate surveys regarding sexual harassment.

## **11. Appeals**

Either the respondent or the complainant or both may appeal from a determination regarding responsibility, and from a recipient's dismissal of a formal complaint or any allegations therein, on the following bases:

1. A procedural irregularity that affected the outcome of the matter;
2. New evidence that was not reasonably available at the time of the determination regarding responsibility or dismissal, that could affect the outcome of the matter; and
3. The Title IX Coordinator, investigator(s), or hearing panel member(s) had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the matter.

Disagreement with the finding or sanctions is not, by itself, grounds for appeals.

The decision maker(s) for the appeal may not be the same person as the hearing panel members, the investigator(s), or the Title IX Coordinator. The appealing party must submit the appeal in writing to the School within seven calendar days after receiving the written determination regarding responsibility. If either the complainant or respondent submits an appeal, the Title IX Coordinator will notify the other that an appeal has been filed and the grounds of the appeal. The non-appealing party may submit a written response within seven days after notice of an appeal.

If the decision-maker concludes that a change in the hearing panel's determination is warranted, the School may enter a revised determination, reconvene the panel to reconsider the determination, or return the matter for additional investigation. If both the complainant and respondent appeal, the appeals will be considered concurrently.

The decision maker will issue a written decision describing the result of the appeal and the rationale for the result, and provide the written decision simultaneously to both parties. Appeals decisions will be rendered within 15 calendar days after the receipt of the written appeal. All appeal decisions are final.

## **12. Records Disclosure & Recordkeeping**

Disciplinary proceedings conducted by the School are subject to the Family Educational Records and Privacy Act (FERPA), a federal law governing the privacy of student information. FERPA generally limits disclosure of student information outside the School without the student's consent, but it does provide for release of student disciplinary information without a student's consent in certain circumstances.

Any information gathered in the course of an investigation may be subpoenaed by law enforcement authorities as part of a parallel investigation into the same conduct or required to be produced through other compulsory legal process. Additional information about FERPA can be found on the School's website at [www.irenes.edu](http://www.irenes.edu).

The School will, upon written request, disclose to the alleged victim of a crime of violence (as that term is defined in Section 16 of Title 18, United States Code), or a non-forcible sex offense, a report on the results of any disciplinary proceeding conducted by the School against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased as a result of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of this paragraph.

The School will maintain for a period of not less than seven years records of:

1. Each sexual harassment investigation including any determination regarding responsibility; any audio, audiovisual recording, or transcript from a hearing conducted in response to a formal complaint; any disciplinary sanctions imposed on the respondent; and any remedies provided to the complainant designed to restore or preserve equal access to the School's education programs or activities;
2. Any appeal and the result therefrom;
3. Any informal resolution and the result therefrom; and
4. All materials used to train Title IX Coordinators, investigators, hearing panel members, decision-makers, and any person who facilitates an informal resolution process. The School will make these training materials publicly available on its website.

The School will create and maintain for a period of not less than seven years, records of any actions, including any supportive measures, taken in response to a report or formal complaint of sexual harassment. In each instance, the School will document the basis for its conclusion that its response was not deliberately indifferent, and document that it has taken measures designed to restore or preserve equal access to the School's education program or activity. If a School does not provide a complainant with supportive measures, then the School will document the reasons why such a response was not clearly unreasonable in light of the known circumstances. The documentation of certain bases or measures does not limit the School in the future from providing additional explanations or detailing additional measures taken.

### **13. Education and Prevention Programs**

As set forth in Section 3 of this Policy statement, sexual assault, sexual harassment, dating violence, domestic violence, and stalking are all forms of prohibited conduct. The School is committed to offering educational programs to promote awareness and prevention of prohibited conduct. Educational programs include an overview of the School's policies and procedures; relevant definitions, including prohibited conduct; discussion of the impact of alcohol and illegal drug use; consent; safe and positive options for bystander intervention; review of resources and reporting options available for students, faculty, and staff; and information about risk reduction. Incoming students and new employees will receive primary prevention and awareness programming as part of their orientation.

As part of the School's commitment to provide an educational and work environment free from prohibited conduct, this Policy will be disseminated widely to the School community through e-mail communication, publications, websites, new employee orientations, student orientations, and other appropriate channels of communication.

The Title IX Coordinator, investigators, hearing panel members, and anyone else who is involved in responding to, investigating, or adjudicating sexual harassment will receive annual training from experts in the field. In addition to training on how the adjudicatory process works, the training will include specific instruction about how to approach students about sensitive issues that may arise in the context of sexual harassment.

### **DRUG & ALCOHOL POLICY**

The philosophy of the Institute is to promote healthy lifestyles. Therefore, it is not appropriate for staff, instructors, or students to abuse alcohol or use illicit drugs. If a student with a substance abuse problem

seeks treatment for the problem, the school will be supportive of this effort. Information about substance abuse prevention, risks, and treatment is provided to all students and further information can be found in the school's financial aid office in a notebook labeled "Substance Abuse."

The use of alcohol, drugs and smoking is prohibited on school premises. No student will report to class under the influence of a mood altering substance not prescribed by a physician. Students must not behave in a manner deemed disruptive to class.

A student, who is convicted of a state or federal offense involving the possession or sale of an illegal drug that occurred while the student was enrolled in school and receiving Title IV aid, is not eligible for Title IV funds. An illegal drug is a controlled substance as defined by the Controlled Substance Act and does not include alcohol and tobacco.

A borrower's eligibility is based on the student's self-certification on the Free Application for Federal Student Aid (FAFSA). Convictions that are reversed, set aside or removed from the student's record, or a determination arising from a juvenile court proceeding do not affect eligibility and do not need to be reported by the student.

A student who is convicted of a drug-related offense that occurred while the student was enrolled in school and receiving Title IV aid loses Title IV eligibility as follows:

For the possession of illegal drugs:

- First offense: one year from the date of conviction
- Second offense: two years from the date of the second conviction
- Third offense: indefinitely from the date of the third conviction

For the sale of illegal drugs:

- First offense: two years from the date of conviction
- Second offense: indefinitely from the date of the second conviction

A school must provide a student who loses Title IV eligibility due to a drug-related conviction with a timely, separate, clear and conspicuous written notice. The notice must advise the student of his or her loss of Title IV eligibility and the ways in which the student may regain that eligibility.

Probation results from any of the following:

- Substance abuse at school or school functions

The specific standards to be removed from probationary status are as follows:

- Disciplinary action may include satisfactory participation in a drug abuse or rehabilitation program approved by the director.

Dismissal from school can result for any of the following reasons:

- Continued alcohol or drug abuse

## **WEAPONS POLICY**

Weapons of any kind are prohibited on school premises. Any student caught in violation of this policy will be dismissed from class, placed on probation, and required to meet with the Executive Director prior to being readmitted to school.

# IRENE'S MYOMASSOLOGY INSTITUTE'S EMERGENCY EVACUATION AND RESPONSE PLAN

## In the Event of a Fire

- Call 911
- Notify Student Records
- Notify Instructor or School Personnel
- Leave belongings and evacuate classrooms in an orderly fashion.
- In the event of a Fire, the automatic sprinkler system will begin operation.
- In the event of a small fire, first contact 911 and report the fire.
- Fire extinguishers are located in the Kitchens on the 1<sup>st</sup> and 2<sup>nd</sup> Floors.
- If you feel the fire is small enough, you may attempt to extinguish the fire by following the Extinguisher instructions on each Extinguisher.

### 2ND FLOOR

- If you are on the 2nd Floor, Go to the Stairwells located at the North and South ends of the Main Hallway.
- Do not use Elevator.
- Proceed down the staircase and exit through the Exterior Doors located at the foot of each Stairwell.
- In the event of smoke, keep low to the ground.

### 1ST FLOOR

- If you are on the First Floor, Exit in an orderly fashion through the main Exit Doors located on the North and South ends of the main Hallway, or through the Store door and Exterior Store Doors located at the East of the Building.
- In the event of smoke, keep low to the ground.

### ADMINISTRATION

- If you are in Administration, Exit in an orderly fashion through the main Exit Doors located on the North and South ends of the main Hallway, or through the Sliding Glass Doors in the Executive Director's Office.
- In the event of smoke, keep low to the ground.

### CLINIC

- If you are in the Clinic, evacuate the Clinic rooms in an orderly fashion. Exit through the Exterior Exit Doors located on the North and South ends of the main Hallway.
- In the event of smoke, keep low to the ground.

### **\* INSTRUCTORS \***

In the event of an evacuation, bring your rosters and sign in sheets. After safely exiting the building, take attendance to make certain all students are out of the building and accounted for.

## **In the Event of a Tornado**

**\*DO NOT PANIC\***

- Leave belongings and evacuate classrooms in an orderly fashion.

### **2ND FLOOR**

- Evacuate the classrooms and locate one of the following areas without windows.
  - The interior hallways on the 2nd Floor.
  - The Bathrooms on the 2nd Floor.
  - The Stairwells located at the North and South end of the Main Hallway
- Sit with your back to a wall.
- Remain calm and seated until the threat of Tornado has passed.

### **1ST FLOOR**

- Go to one of the following areas without windows.
  - The Interior Hallway from the Store to the Main Hallway
  - The Bathrooms Located on the Interior Hallway.
  - The Stairwells located at the North and South end of the Main Hallway
- Sit with your back to a wall.
- Remain calm and seated until the threat of Tornado has passed.

### **ADMINISTRATION**

- Evacuate the exterior offices and Student Records area.
- Go to one of the Interior Offices without windows.
- Close the doors.
- Sit with your back to a wall.
- Remain calm and seated until the threat of Tornado has passed.

### **CLINIC**

- Evacuate exterior clinic rooms with windows.
- Go to the interior clinic room or Bathrooms located off the Clinic Hallway.
- Close the doors.
- Sit with your back to a wall.
- Remain calm and seated until the threat of Tornado has passed.

## In the Event of a Medical Emergency

- **Call 911.**
- Inform Student Records, Instructor and School Personnel.
- Keep the individual or individuals still and calm until EMT arrives.
- Individual trained in CPR and First Aid may render assistance if necessary.
- An **incident report** must be completed in a timely manner for all incidents.

**IRENE'S MYOMASSOLOGY INSTITUTE'S  
ANNUAL CAMPUS SECURITY REPORT  
SEPTEMBER 2022**

As participants in the Title IV program, Irene's Myomassology Institute prepares this report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act. Listed below are the statistics for any crime reported through the Southfield Police Department that occurred on Irene's campus (26061 Franklin Road) for the past three years:

<b>Criminal Offenses On-Campus</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Murder/Non-negligent Manslaughter	0	0	0
Negligent Manslaughter	0	0	0
Sex Offenses: Forcible	0	0	0
Rape	0	0	0
Fondling	0	0	0
Sex Offenses: Non-forcible	0	0	0
Incest	0	0	0
Statutory Rape	0	0	0
Robbery	0	0	0
Aggravated Assault	0	0	0
Burglary	0	0	0
Motor Vehicle Theft	0	0	0
Arson	0	0	0
<b>VAWA Offenses – On Campus</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Domestic Violence	0	0	0
Dating Violence	0	0	0
Stalking*	0	0	0
<b>Arrests On Campus</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Weapons Violations: Carrying, Possessing, Etc.	0	0	0
Drug-Related Violations	0	0	0
Liquor Law Violations	0	0	0
<b>Disciplinary Actions On Campus</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>

Weapons Violations: Carrying, Possessing, Etc.	0	0	0
Drug-Related Violations	0	0	0
Liquor Law Violations	0	0	0

<b>Hate Crimes On Campus</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>
Murder/Non-negligent Manslaughter	0	0	0
Negligent Manslaughter	0	0	0
Sex Offenses: Forcible	0	0	0
Sex Offenses: Non-forcible	0	0	0
Rape	0	0	0
Fondling	0	0	0
Incest	0	0	0
Statutory Rape	0	0	0
Robbery	0	0	0
Aggravated Assault	0	0	0
Burglary	0	0	0
Motor Vehicle Theft	0	0	0
Arson	0	0	0
Simple Assault	0	0	0
Larceny-Theft	0	0	0
Intimidation	0	0	0
Destruction/Damage/Vandalism of Property	0	0	0

To request a crime report for the geographical area surrounding the campus, please stop by the Financial Aid office or via email at [Jeff@Irenes.edu](mailto:Jeff@Irenes.edu). Statistics are also available online at <http://www.Irenes.edu>.

