CAMPUS SECURITY AND CRIME REPORTING POLICY

It is the goal of Douglas J Aveda Institute and Aveda Institute of Chicago to offer educational training in a secure and crime free environment. The following policies and procedures have been developed to better ensure a safe environment for our students and staff.

ANNUAL REPORTING:

Douglas J Aveda Institute and Aveda Institute of Chicago submit annual security reports to the U.S. Department of Education. This report includes statement of campus security policy and procedure in addition to the disclosure of specific crimes reported on or in the immediate area of the school. Sources of information used in the report may come from local law enforcement and campus reports. Content of the Campus Security report is published on federal websites such as http://ope.ed.gov/security/ and http://nces.ed.gov/collegenavigator/. The school posts its Campus Security and Crime Report and Policy on its website located in the Consumer Information tab.

DISSIMINATION OF CAMPUS SECURITY REPORT INFORMATION:

STUDENTS:

All students receive a handout Campus Security and Crime Reporting policy during mandated orientation. The school also sends an annual notice to current students via campus email as to the location of the report on the school’s website.

Prospective students receive a CAMPUS SECURITY AND CRIME REPORTING Statement when they tour the Institute. This statement advises the availability of the campus security report and a brief description of its content.

FACULTY AND STAFF:

Douglas J Aveda Institute and Aveda Institute of Chicago conduct new employee orientations. At that time the Campus Security and Crime Reporting policy is reviewed and a copy given to all attendees.

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Douglas J Aveda Institute Chicago
addition, the school sends out an annual notice to all current employees as to the location of the most current Campus Security Report on the school’s website.

Prospective employees are provided with a statement advising the location of the school’s campus security report and a brief description of its content

CAMPU SECUR AUTHORITY
The Director of Administration is the designated campus security authority. All incidences of campus crime must be reported for proper action and inclusion in the annual Campus Security report. The Director does not have primary responsibility of counseling students for minor infractions or violation of campus policy, but rather, that responsibility is left to instructors and other senior staff personnel. The Director will work with Local, State, and Federal law enforcement official as necessary for the safety of the school’s student and staff.

MEDICAL EMERGENCIES
New students and staff at the Douglas J Aveda and Aveda Institute Chicago are requested to disclose information about any known medical conditions the student/employee has, in order to better assist the student in the event of an emergency.

If a medical emergency occurs during class, campus staff will attempt to keep the stricken person immobile and immediately notify the Director of Administration or designee. Medical Emergency personnel will be contacted at the individual’s request, or, in the event the stricken individual is either unconscious or perceived to be in a life threatening condition, the Director will call 911

First aid kits are located by the shampoo bowls in the back of the clinic floor at all locations.

BUILDING ACCESS
All visitors to the Douglas J Aveda Institute and Aveda Institute of Chicago must sign in at the guest services desk located at the front of the building. Students and staff should notify a Department Director immediately if an unauthorized visitor is noticed within the building.

Students do not have access to the building unless accompanied by a member of the staff or faculty.
Keys to individual office/work areas are issued only to the directors, staff, and faculty and the school owners as needed. Backup keys are held by the school’s owners. Requests for replacement or additional keys must be made to a director.

PERSONAL BELONGINGS
Students are strongly encouraged to keep clinic stations and lockers securely locked at all times. DOUGLAS J AVEDA INSTITUTE WILL NOT BE HELD RESPONSIBLE FOR THE THEFT OR LOSS OF ANY STUDENTS’S BELONGINGS OCCURRING AT THE SCHOOL. Staff should store all personal belongings in a secure location.

ALCOHOL, DRUG, WEAPONS
The possession, use and/or sale of alcohol and/or any illegal drugs is strictly forbidden on Douglas J Aveda and Aveda Institute Chicago properties or to any activity sanctioned by the School, whether on-site or off. To assist in the enforcement of drug and underage drinking laws, Douglas J Aveda and Chicago Aveda Institute will notify local and State policing agencies when any such activity occurs on campus. Any student or employee in violation of this policy may be terminated from school/employment immediately.

The possession and/or use of any weapons, including but not limited to knives and firearms, are strictly prohibited and are also cause for immediate termination.

CAMPUS SECURITY POLICY
Aveda Institute Chicago and Douglas J Aveda Institute do not utilize campus law enforcement personnel. Staff and students are encouraged to be responsible for their own security and the security of others by accurately and promptly reporting suspected or apparent criminal activity to the Director of Administration and/or local law enforcement. The reporting of criminal activity or suspicion of such may be reported to the Director of Administration anonymously, in strict confidence or voluntarily. The Director will notify the Compliance Manager so the information may be included in the school’s annual reports. In addition, students and staff are required to participate in routine emergency drills and activities conducted by the institution throughout the year.

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CRIME REPORTING POLICY
Students and staff are strongly urged to report all incidences of illegal criminal activity to a Department Director or other staff members. Institute personnel will pass the information to the Director of Administration.

It is the policy of Douglas J Aveda and Aveda Institute Chicago that any incident that constitutes a crime under local, state, or federal law may be reported to the police at the discretion of a Director of Administration. Any activity that would constitute a felony crime MUST be reported to the appropriate law enforcement agency by the Director of Administration. Examples of such crimes would include, but are not limited to: murder, forcible and non-forcible sex offenses, rape, robbery, aggravated assault, burglary and motor vehicle theft.

SEX OFFENSES
Students and employees should immediately report all sex offenses to a Department Director. Physical evidence is crucial for the successful prosecution of all sex offenders and therefore should be preserved for proof of a criminal offense. Students and employees should notify police authorities, if the victim desires. The occurrence of the sexual offense will be included on the school’s annual reporting requirements.

The Douglas J Aveda Institute does not have professionally trained on-campus counseling to sex offense victims. However, the staff will provide whatever assistance it can. Students seeking counseling on this should see the Admissions Coordinator for their campus for specific information.

If requested, and if the request can be reasonably accommodated, Douglas J Aveda and Aveda Institute Chicago will review options for changing a victim’s academic schedule after an alleged sex offense occurs.

The Douglas J Aveda Institute will convene, as needed, a disciplinary committee for hearing accusations of on-campus sex offenses between members of the institution’s staff and/or student body. The disciplinary committee will consist of the Director of Administration and the Director of Education and one other staff member as approved by both the accuser and the accused. If parties involved in the
proceedings are not able to agree on an independent staff member, the proceedings will be conducted by only the Director of Administration and the Director of Education.

The Douglas J Aveda Institute has established the following procedures for campus disciplinary proceedings:

1. Both the accuser and accused are entitled to have others present during a disciplinary proceeding;
2. Both parties shall be informed of the outcome of any institutional disciplinary proceeding brought alleging a sex offense.

The institution’s final determination will be limited to any alleged sex offense and to any sanction imposed against the accused. Douglas J Aveda Institute may impose any of the following sanctions following a disciplinary proceeding regarding rape, acquaintance rape, or other forcible and non-forcible sex offenses:

1. Require the accused to provide proof that professional counseling is being received.
2. Administratively dismiss the accused.
3. Suspend the student or hold a disciplinary hearing pending the completion of legal proceedings.
4. Dismiss the accuser’s accusations as unfounded if appropriate.

Below are examples of State and federal sexual offender public websites

http://www.mipsor.state.mi.us/ - Michigan

http://www.isp.state.il.us/sor/ - Illinois


http://www.nsopr.gov/?AspxAutoDetectCookieSupport=1 - National

**SEX CRIME PREVENTION:**
Douglas J Aveda and Aveda Institute Chicago enlist the aid of local law enforcement and public service agencies to address the issue of sex crime prevention, the awareness of rape and other related topics to student and staff at least twice a year.

Websites such as those listed below provide additional information on sex crime prevention

vcic.vermont.gov/sites/vcic/files/SexCrimePrevention.ppt


http://www.ncbi.nlm.nih.gov/pmc/articles/PMC2820068/

TIMELY WARNING AND EMERGENCY NOTIFICATION
Douglas J Aveda and Aveda Institute Chicago has developed the following policy and procedure for notifying students of emergencies and reported crimes specific to the Clery Act.

Crime in the surrounding area:

- When a staff member becomes aware of a Clery Act crime committed in the surrounding area of the school, that staff will be expected to report the source of the information and rumored details of the crime to the Director of Administration. The Director is responsible for confirming the occurrence of the crime, its location, and whatever detail is available from local authorities, staff and/or students.
- Once confirmed, the Director of Administration will notify the Compliance Manager of the report details and post warning bulletins in each classroom, the staff break room and the student break room describing the Clery Act crime that occurred, the location and as much detail as provided by local authorities. The notice must be dated with instructions how to proceed if readers have information related to the crime.
- When asked by local authorities to do so, the school will cooperate with requests to make or post public announcements as much as possible.

Crimes on campus:
In cases where student or staff is arrested by local authority on campus property for a Clery Act crime, the Director of Administration will report the arrest and associated details to the Compliance Manager.

Within 24 hours, the Director will post a bulletin in the classrooms and break rooms notifying students of the arrest and any pertinent details. The bulletin may also include appropriate instruction toward vigilance, campus contact, reminder of policy, etc. as the Institute Director and Compliance Manager deem appropriate.

In emergency situations where a dangerous situation is occurring in the immediate area:

- As soon as the campus is made aware of a dangerous situation in the immediate area, the Director of Administration or designee will instruct staff and students to behave as local authorities dictate. In the event the school has not yet been contacted by police or other emergency personnel, the Director of Administration will enforce a lock down.

**EMERGENCY RESPONSE & EVACUATION POLICY**

Upon the notification of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students and/or employees occurring on the campus, staff and students are expected to abide by the following:

1. All emergencies or dangerous situations occurring on campus or in the immediate area of the campus should be reported to the Director of Administration (DOA). The DOA serves as the Campus Security Authority.
2. In most cases, the Director of Administration has the responsibility to confirm the existence and significance of the crime using appropriate resources that may include local law enforcement, fire department, news reports, eye witnesses, and recognizable evidence.
3. Once confirmed, the DOA must decide upon the necessary action and notifications needed to best protect the safety of those in the school. Whenever possible, professional advice from local authorities should be sought especially in cases where the notification of the dangerous situation may compromise efforts to assist victims or to contain, respond to, or otherwise mitigate the emergency.
4. Necessary action may include contacting local emergency personnel, evacuation, lock down, relocation to a safer area of the school, etc.
5. The Institute Director or designee will serve as the liaison between the school and local authorities.

6. All emergency occurrences are reported to the Compliance Manager for use in required reports submitted by the Compliance Manager on an annual basis.

7. Institute personnel and students should immediately contact emergency assistance—police, fire, and ambulance—in life threatening situations. The Director of Administration should be notified immediately when emergency assistance is called.

In the case of **FIRE**:

- The Director of Administration is responsible to see that local emergency services are promptly notified (example police, fire, etc.) once the emergency is known.
- Students and patrons will be instructed by staff to immediately stop what they are doing and exit the building safely and to report immediately to assigned emergency location(s).
- Upon arrival to assigned evacuation location, faculty and administrative staff will attempt to record the names of all students and staff present.
- Students will not be allowed to return to the campus until local fire authorities advise the building is safe to re-enter. The Institute Director or his/her designee will notify staff and students to return to the building.
- If return to the building is possible according to fire officials, the Institute Director or his/her designee will inform staff and require all students to report their names to the faculty or administrative staff before they leave the site.
- As soon as possible, faculty and administrative staff will submit their attendance lists and departure lists to the Institute Director and Compliance Manager for safekeeping and future reference.

In case of **WEATHER EMERGENCY**:

- Upon hearing city tornado warning sirens or determining dangerous weather conditions exist, staff will instruct students and patrons to immediately stop what they are doing and proceed to designated shelter areas within the building.
- An emergency locker is maintained in the shelter area(s).

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Once the city tornado sirens stop, the Institute Director or designee will investigate the safety of and reasonability of exiting the shelter area(s) safely.

In the event of an electrical outage, students and staff are required to turn off all electrical appliances, computers, and peripheral equipment or at the surge protector, if applicable.

In the case of FLOODING:

- As soon as staff is made aware of an area(s) within the building of flood, the Institute Director or designee will notify building maintenance and determine necessary action to better assure the safety of all persons in the area.
- Assigned staff will set up cones and signs to advise no entry for safety purposes.
- If necessary, students may be re-assigned work areas where conditions are acceptable.
- Upon repair and removal of flood debris, water, etc., students will be allowed to re-enter the affected area(s).
- In extreme cases where it is necessary to evacuate the building, staff will notify students and patrons of the need to exit the building and to report to designated evacuation locations for sign in. If fire and city authorities advise against re-entering the building, the Institute Director/designee will notify staff and instruct students to report their names to the faculty and/or administrative staff before they leave the site.

Method of Notification:

- Fire alarms can be used in emergencies to evacuate the campus should the need arise.
- Verbal instruction may be used to notify persons on campus of the emergency with instruction of necessary action.
- A mass text or individual text can be sent to teachers to advise them of the emergency situation along with instructions.
- As circumstances permit, signs and/or staff may be positioned at all entrances and exits advising entering students, staff and patrons of the situation with instruction on what actions to take along with contact information as campus authorities deem appropriate.
- If time permits, evening students may be contacted by phone to advise the situation and given instruction.
Emergency Drills:

- Tests of the emergency response and evaluation procedures will be conducted quarterly to best accommodate our short term programs. These tests may be announced or unannounced.
- Results of emergency drills are reported to the Compliance Manager by the Institute Director for evaluation and suggested areas of improvement.
- Evacuation route maps are posted in classrooms and in the office area. All students and staff should familiarize themselves with the evacuation routes.
- For fire safety and general health reasons, the Douglas J Aveda Institute observes a NO SMOKING policy in all classrooms, offices, and throughout the entire building.

INCIDENT REPORTING PROCEDURES
All incidents occurring in the classroom must be immediately reported to the Director of Administration. Incidents occurring in the administrative offices must be immediately reported to the department supervisor.

Only a Director of Administration or administrative office supervisor should contact police, except in life-threatening situations.

Incident report forms must be completed by the faculty, staff or management representatives involved in the occurrence. The forms are to be filled out by campus personnel and turned into the Director of Administration within 48 hours of the incident. Administrative office forms should be submitted to the department supervisor within 48 hours of the incident.

All police reports filed concerning criminal actions occurring on Douglas J Aveda and Aveda Institute Chicago premises or occurring during off-site school functions will be maintained by the Compliance Manager.

FERPA DISCLOSURES
Douglas J Aveda and Aveda Institute of Chicago may disclose information from a student’s education’s records to parents in the case of a health or safety emergency that involves the student.
Douglas J Aveda and Aveda Institute of Chicago may let parents of students under the age of 21 know when the student has violated any law or policy concerning the use or possession of alcohol or a controlled substance.

A school official may share with parents information that is based on that official’s personal knowledge or observation and that is not based on information contained in an education record.

Campus Security records created and maintained by Douglas J Aveda and Aveda Institute Chicago are exempt from the privacy restriction of FERPA. The school may disclose information to anyone, including parents or federal, state or local law enforcement authorities, without the consent of the student.

Douglas J Aveda and Aveda Institute Chicago may disclose personally identifiable information from an education record of a student without the student’s consent in accordance to 34CFR 99.31(a)(13) and 34CFR 99.31(a)(14) as it pertains to disclosure of final results of the disciplinary proceeding conducted by the school.