



TITLE IX SEXUAL MISCONDUCT GRIEVANCE POLICY

Douglas J Aveda Institute and Douglas J School of Barbering (herein known as “Douglas J Schools”) is committed to maintaining a safe learning, living and working environment. This includes having an environment free from sexual misconduct.

Sexual misconduct under this policy is sex discrimination, sexual harassment and retaliation that may violate Title IX of the Education Amendments of 1972 ("Title IX").

Douglas J Schools does not discriminate on the basis of sex in its education programs or activities and is precluded from engaging in such discrimination by Title IX and its implementing regulations, 34 CFR Part 106. This prohibition also extends to Douglas J Schools’ admission and employment processes.

Reporting

Douglas J Schools encourages individuals to promptly report incidents of sexual misconduct. A report or complaint may also concern retaliation for filing a complaint or participating in an investigation. We expect that all complaints will be filed in good faith.

Reporting does not have a statute of limitations. You can report that an incident occurred at any point afterward, and it will be addressed within the ability of Douglas J Schools. Reporting is important for three reasons:

1. Douglas J Schools must fulfill its obligations under Title IX, which require an investigation and prompt remedial action;
2. Douglas J Schools must provide appropriate interim measures and resources; and
3. Douglas J Schools must fulfill its reporting obligations regarding certain crimes pursuant to the Clery Act.

Anyone can make a report by calling, or sending an email or letter, to the Title IX Coordinator:

517-853-3910
TitleIX@douglasj.com

Note: Unless stated otherwise, the document refers to all schools which are:
Douglas J Aveda Institute Michigan Locations: Ann Arbor, East Lansing, Grand Rapids, Royal Oak
Douglas J Aveda Institute Tennessee Location: Knoxville
Douglas J Aveda Institute – Chicago
Douglas J School of Barbering

Anonymous reports

Anyone wishing to make an anonymous report of sexual misconduct can do so by calling the Title IX Coordinator at 517-853-3910. Depending on the extent of information provided by the anonymous report about the incident or the individuals involved Douglas J Schools' ability to respond to an anonymous report may be limited.

The Title IX Coordinator will receive the anonymous report and determine any appropriate steps in light of the available information. Where there is sufficient information, Douglas J Schools will ensure that anonymous reports are reviewed and included for compliance with the Clery Act.

Consistent with Douglas J Schools' obligations under federal law, it is required to notify a student who reports having experienced sexual misconduct by another student, an educator, or a staff member, that the student has the option to report the matter to law enforcement, to Douglas J Schools, to both, or to neither, as the student may choose.

Reporting - Mandatory

The staff and educators at Douglas J Schools are considered Responsible Employees and are obligated to promptly report incidents of sexual misconduct. Consistent with Douglas J Schools' obligations under federal law, it is required to notify a student who reports having experienced sexual misconduct by another student, an educator or a staff member, that the student has the option to report the matter to law enforcement, to Douglas J Schools, to both, or to neither, as the student may choose. Regardless of what course of action the student chooses,

Douglas J Schools' educators and staff who know of or have received information about a sexual misconduct or potential sexual misconduct incident that occurred on campus, in a program, or at a school-sponsored event, must promptly report that incident to the Title IX Coordinator so that Douglas J Schools can fulfill its institutional obligations. When in doubt, report it.

Keep in mind that all of types of sexual misconduct are traumatic experiences, causing a mixture of emotions (fear, anxiety, anger, depression, guilt). Your response and support can make a big difference.

Confidentiality and Privacy

In light of this mandatory reporting requirement, it is important for educators and staff to know that if a student reports an incident to you, you cannot promise confidentiality and should inform the student that you are required to report the incident to the Title IX Coordinator. Once reported, for the privacy of the parties involved, it should not be discussed with anyone else.

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Reports and information regarding an incident will only be shared with the necessary parties involved in the Title IX investigation process. Investigators are not legally bound to confidentiality; however, they are required by Douglas J Schools to remain discreet and to respect the privacy of any and all individuals involved in the Title IX process.

Investigation

Douglas J Schools is still obligated to investigate, even where the student chooses not to report or where the student is unwilling or reluctant to participate in an investigation. Douglas J Schools will proceed in a way that takes into account the concerns of the student survivor/victim and its responsibility to provide a safe and non-discriminatory environment to the entire campus community.

Confidential Resources

Confidential resources are available for those involved in a Title IX investigation and/or hearing. These individuals are required by either law or their own governing body to keep shared information confidential. Some individuals who act as confidential resources in their roles are:

- Medical providers
- Mental health providers (e.g. counselors, therapists, and clinical psychologists)
- Ordained clergy/pastoral ministers (or similar)
- Rape crisis counselors and advocates

These individuals will not share this information with anyone unless they believe the person is a threat to themselves, to those around them, or if they are suspected of abuse of children under the age of 18. Otherwise, they are prohibited from breaking confidentiality without written permission from the individual seeking services.

Supportive Measures

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 involved in an alleged incident of sexual misconduct, before or after the filing of a complaint or where no complaint has been filed.

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Supportive measures are designed to restore or preserve access to a party's education without unreasonably burdening either party; to protect the safety of all parties and Douglas J Schools' educational environment, and to deter sexual misconduct.

Supportive measures may include counseling, extensions of deadlines or other course-related adjustments, modifications of work or class schedules, campus escort services, mutual restrictions on contact between the parties, changes in work locations, increased security and monitoring of certain areas of campus, and other similar measures.

In fairly assessing the need for a party to receive such measures, Douglas J Schools will not rely on fixed rules or operating assumptions that favor one party over another, nor will it make such measures available only to one party.

The measures needed by each student may change over time, and the Title IX Coordinator will communicate with each student to ensure that any supportive measures are necessary and effective based on the students' evolving needs.

Title IX Coordinator

The Title IX Coordinator at Douglas J Schools is

Director of Compliance & Student Services

517-853-3910

TitleIX@douglasj.com

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