

Metro Beauty Academy, LLC
General Policies on:
Campus Security and Crime Awareness
Including Clery Act & VAWA Reporting
Timely Warning & Emergency Notification Emergency Evacuation

Metro Beauty Academy is committed to providing students with a safe environment in which to learn and to keep parents and students well-informed about campus security. In accordance with the Crime Awareness and Campus Security Act of 1990, and the Higher Education Act Section (a) and (f), the institution collects campus crime statistics and prepares a report for distribution to all students, employees and applicants for enrollment or employment. This report contains information on Occurrences within 2015, 2016, and 2017 Calendar Years, Campus Security and Crime Awareness, Timely Warning and Emergency Notification System, and Emergency Response and Evacuation.

The school publishes and makes our current population aware of the annual campus security report via postings in public areas. Students and employees will receive electronic notification regarding the url address and availability of paper documents. The complete Campus Security and Crime Awareness Policy is distributed after its revision each year. A paper copy may be obtained at anytime from the Office of the Director of Education upon request at Metro Beauty Academy. The report is published yearly by October 1st.

Crime Statistics

Campus is defined as "any building or property owned or controlled by the school within the same contiguous geographic area and used by the school in direct support of, or related to its educational purpose." The campus includes the facilities located at 4977 Medical Center Circle, Allentown, PA 18106. There are no buildings or properties owned or controlled by campus student organizations which are recognized by this institution.

Occurrences within the 2015, 2016 and 2017 Calendar Years

Crimes Reported	2015	2016	2017	Location C = Campus P = Public	* classified as a Hate Crime (indicate year)
Murder /Non-negligent manslaughter	0	0	0		0
Negligent manslaughter	0	0	0		0
Sex Offenses – forcible	0	0	0		0
Sex Offenses – Non-forcible – Incest	0	0	0		0
Sex Offenses – Non-forcible – Statutory Rape	0	0	0		0
Sex Offenses – Non-forcible – Fondling	0	0	0		0
Robbery	0	0	0		0
Aggravated Assault	0	0	0		0
Burglary	0	0	0		0
Motor Vehicle Theft	0	0	0		0
Arson	0	0	0		0
Simple Assault	0	0	0		0
Larceny-theft	0	0	0		0
Intimidation	0	0	0		0
Destruction/Damage/Vandalism of Property	0	0	0		0
Domestic Violence/Date Violence/ Stalking (including cyber-stalking)	0	0	0		0

Number of arrests made for the following crimes	2015	2016	2017	Referred for campus disciplinary action? (Yes) (No)
Weapons Possession	0	0	0	NA
Liquor Law Violations	0	0	0	NA
Drug Abuse Violations	0	0	0	NA

Revised Date: 7/16/2018

*Crimes in which the victim is intentionally selected because of the actual or perceived race, gender, religion, national origin, sexual orientation, gender identity, ethnicity, or disability as prescribed by the Hate Crimes Statistics Act (28 U.S.C. 534).

Campus Security and Access

- All students and employees are encouraged to be responsible for their own security and the security of others.
- No student will have access to the campus facilities, other than the parking area, at any time unless supervised by a staff member. Any off-campus events which are sponsored by the school are supervised by campus employees. Thus, the school will monitor and report any criminal activity at such events to local law enforcement authorities, should they occur.
- The campus does not employ campus security officials. The security of the campus is the direct responsibility of each employee (excluding clerical and maintenance staff) and the Campus Security Authority(CSA) officials with significant responsibility for students which are the Office of the Director of Education, the Office of the Director of Finance, the Title IX Coordinator and any Student Council Advisors. CSA officers report to the Director of Education's Office. No such individual has the authority to make arrests.
- Training is provided as required and deemed necessary and appropriate for our CSAs.
- Title IX Coordinator can be reached at 1-888-782-7221 or via email at TitleIXCoordinator@metrobeautyacademy.com.
- All individuals are encouraged and requested to immediately report any known criminal offense, or other emergency, occurring on campus to the Director of Education's office on the Incident Report Form.
- All individuals are also encouraged to accurately and promptly report all crimes to appropriate police agencies. It is imperative that individuals preserve evidence that may be related to the alleged criminal offense. The Director of Education will report all known criminal offenses to local law enforcement authorities upon receiving the report, or upon obtaining knowledge of any criminal offense.
- Metro Beauty Academy does not have agreements with such agencies for the investigation of alleged criminal offenses.
- Reporting a criminal offense is voluntary and confidential to the extent of inclusion in the annual security report.
- Metro Beauty Academy does not employ any pastoral counselors or professional counselors on staff and as such we do not have any policies regarding voluntary confidential reporting procedures for pastoral or professional counselors as it does not apply.
- To inform STUDENTS about campus security procedures and practices, the policy is provided and signed during the enrollment process, practices and policies discussed and acknowledged by signature during student orientation, reviewed in September; acknowledging National Campus Safety Awareness Month.
- To inform EMPLOYEES about campus security procedures and practices, the policy is provided and signed during the initial hire paperwork, discussed and acknowledged by signature during a staff meeting each February, reviewed in September; acknowledging National Campus Safety Awareness Month.
- Metro Beauty Academy does not offer crime prevention programs.
- Metro Beauty Academy will provide written notification to students about student financial aid services available at the school.
- A copy of the Student's Rights or Employee's Rights Policies can be requested from the Director of Education's Office.

Sexual Harassment & Sexual Violence Policy

- Metro Beauty Academy prohibits the crimes of dating violence, domestic violence, sexual assault, and stalking.
- Definitions:

Revised Date: 7/16/2018

- *Dating violence*: Defined as violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based on the reporting of party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of the interaction between the persons involved in the relationship.
- *Domestic violence*: Defined as a felony or misdemeanor crime of violence committed by a current or former spouse or intimate partner of the victim; by a person with whom the victim shares a child in common; by a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner; by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.
- *Sexual assault*: Defined as any sexual act directed against another person without consent of the victim, including instances where the victim is incapable of giving consent.
- *Stalking*: Defined as engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for the person's safety or the safety of others; or suffer substantial emotional distress.
- *Consent*: Defined as voluntary, non-coerced and clear communication indicating a willingness to engage in a particular act. "Explicit consent" includes an affirmative verbal response or voluntary acts unmistakable in their meaning.
- Guest speakers are scheduled at least semi-annually which may include handouts to promote awareness and prevent crime, rape, acquaintance rape, domestic violence, dating violence, sexual assault, and stalking. The school participates in these activities to promote prevention through awareness and to reduce risk to all parties.
- Referral resources are available through the Office of the Director of Education. Please reference the Community Resources Section of this document.
- Metro Beauty Academy complies with Pennsylvania Law in recognizing any court ordered stipulations regarding protection including but not limited to Protection From Abuse Orders.
- Metro Beauty Academy cannot apply for a legal protective order or restraining order for a victim. The victim is required to apply directly for these services through the criminal court systems.
- Metro Beauty Academy fully complies with any protective order issued through the criminal or civil justice systems if made aware of such an order and will act accordingly to support that order. Any person who obtains an order of protection from a court of any of the fifty states should provide a copy to the office of the Director of Education. A complainant may then meet with Director of Education to develop a Safety Action Plan, which is a plan for Metro Beauty Academy and the victim to reduce risk of harm while on campus or coming and going from campus. This plan may include, but not limited to: escorts or special parking arrangements.
- Accommodations or protective measures are provided if the victim requests them and if they are reasonably available, regardless of whether the victim chooses to report the crime to local law enforcement.
- Metro Beauty Academy may issue an institutional no contact letter if deemed appropriate or at the request of the victim or accused. To the extent of the victim's cooperation and consent, Metro Beauty Academy offices will work cooperatively to ensure that the victim's health, physical safety, work and academic status are protected, pending the outcome of a formal investigation of the complaint.
- Additionally, personal identifiable information about the victim will be treated as confidential and only shared with persons with a specific need to know who are investigating/adjudicating the complaint or delivering resources or support services to the complainant (for example, publicly available record-keeping for purposes of Clery Act reporting and disclosures will be made without

inclusion of identifying information about the victim, as defined in 42 USC 1395 (a) (20).) Further, the institution will maintain as confidential, any accommodations or protective measures provided to the victim to the extent that maintaining such confidentiality would not impair the ability of the institution to provide the accommodations or protective measures.

- In the event a sex offense occurs on campus, the accuser has the option to and should take the following steps:
 - Report the disciplinary offense to the Office of the Director of Education and or the Title IX Coordinator on the Incident Report Form. Preserve any evidence, as may be necessary to prove criminal sexual assault, this being extremely important.
 - Review options regarding law enforcement notification, including report the crime to local law enforcement agencies (1) on the victim's own, (2) with the assistance of the campus authorities, or (3) decline to notify such authorities.
 - Report the crime to local law enforcement agencies if desired.
 - Request a change in the academic situation, if desired.
 - Contact an appropriate agency or other services that may be needed for counseling or help.
- Steps, anticipated timelines and decision-making process for alleged dating violence, domestic violence, sexual assault and or stalking are described in the bullets below.

Investigation of Complaints

- In response to all complaints, Metro Beauty Academy promises prompt and fair resolution through a reliable and impartial investigation, including the opportunity for both parties to present witnesses or other evidence. The time necessary to conduct an investigation/preceding will vary based on complexity but will generally be completed within sixty (60) days of receipt of the complaint. Metro Beauty Academy shall maintain confidentiality for all parties to the extent possible, but absolute confidentiality cannot be guaranteed. In cases where a student does not give consent for an investigation, Metro Beauty Academy will weigh the student's request for confidentiality against the impact on School safety to determine whether an investigation must proceed. Complainants should be aware that in a formal investigation due process generally requires that the identity of the charging party and the substance of the complaint be revealed to the person charged with the alleged harassment.
- Proceedings will be conducted by the Title IX Coordinator who at minimum, receives annual training on:
 - the issues related to dating violence, domestic violence, sexual assault and stalking
 - how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability
- The clear and convincing evidence standard will apply to investigations, meaning Metro Beauty Academy will evaluate whether it is more likely than not that the alleged conduct occurred. Both parties will receive written notice of the outcome of the complaint.
- During the investigation, Metro Beauty Academy will provide interim measures, as necessary, to protect the safety and well being of students and/or employees involved.
- Following an allegation Metro Beauty Academy will offer the victim a range of protective measures that may include but is not limited to, escorts, special parking assignment, or academic schedule changes.
- If Metro Beauty Academy determines, following a disciplinary preceding, that an allegation of dating violence, domestic violence, sexual assault or stalking has occurred, immediate appropriate corrective action will be taken in accordance with the circumstances involved. Metro Beauty Academy will take steps to prevent the recurrence of any harassment or discrimination. Any employee determined by Metro Beauty Academy to be responsible for unlawful harassment or discrimination will be subject to appropriate disciplinary action, up to and including termination. Remedies for student-related claims may include, but are not limited to, an order to stay away, suspension, or expulsion.
- To initiate a criminal investigation, reports of sexual violence should be made to "911" or local law enforcement. The criminal process is separate from Metro Beauty Academy's disciplinary process. To the extent that an employee or contract worker is not satisfied with Metro Beauty Academy's

handling of a harassment or discrimination complaint, he or she may also contact the appropriate state or federal enforcement agency for legal relief.

- Appeal Process - Metro Beauty Academy allows the accused and or victim to appeal the School's decision by making their appeal in writing within seven (7) days to the Office of the Director of Education. Changes to the result will be provided in writing to both accused and victim within thirty (30) days of appeal receipt. The results will become final upon receipt of written outcome.
- Retaliation Prohibited - Metro Beauty Academy will not retaliate against anyone for filing a complaint, and will not tolerate retaliation by students or employees. If you believe you have been retaliated against, you should promptly notify the Title IX Coordinator.
- Reporting Requirements - Victims of sexual misconduct should be aware that Metro Beauty Academy administrators must issue timely warnings for incidents reported to them that pose a substantial threat of bodily harm or danger to other members of the campus community. Metro Beauty Academy will make every effort to ensure that a victim's name and other identifying information is not disclosed, while still providing enough information for community members to make safety decisions in light of the danger. Metro Beauty Academy reserves the right to notify parents/guardians of dependent students regarding any health or safety risk, or a change in student status.
- The school does not provide living situations, transportation situations, or working situations during enrollment. The school will change a victim's academic situation after the alleged sex offense, if requested by the victim, and the change is reasonably available regardless if the victim chooses to report the crime to local law enforcement.
- Metro Beauty Academy will provide written notification to victims about options for assistance in and how to request changes to their academic situation.
- Metro Beauty Academy will provide written explanation of the student's or employee's rights and options to the student or employee when they report to the institution that the student or employee has been a victim of dating violence, domestic violence, sexual assault, or stalking whether the offence occurred on or off-campus.
- Metro Beauty Academy does not provide existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance or other services for victims on campus, but may at times become aware of and may provide written notification to students and employees about those services provided in the community and at the institution. Please reference the Community Resources Section of this document.
- On campus disciplinary proceedings and action in cases of alleged sexual assault, dating violence, domestic violence and or stalking will be based on findings by the law enforcement agency investigation, facts pertaining to the crime, and other related mitigating circumstances provided that:
 - the accuser and the accused may have others present during the campus disciplinary proceeding and may be accompanied to any related meeting or proceeding by the advisor or their choice; and,
 - both the accuser and the accused shall be informed simultaneously, in writing of:
 - the result of an institutional disciplinary proceeding that arises from an allegation of dating violence, domestic violence, sexual assault, or stalking
 - the institution's procedures for the accused and the victim to appeal the result of the institutional disciplinary proceeding, if such procedures are available.
 - any change to the result
 - when such results become final
 - Extensions for disciplinary proceeding may be requested in writing to the Office of the Director of Education.
- Law enforcement agency information provided by the state concerning registered sex offenders may be obtained at <https://www.pameganslaw.state.pa.us/>

Substance Abuse Policy

- Drug Abuse is prohibited at all times by students and employees on the school property or as part of any of its activities. Drug abuse is defined as: *"The unlawful manufacture, distribution, possession or use of illicit, controlled substances, including alcohol."*

Revised Date: 7/16/2018

- The institution prohibits possession, use and sale of alcoholic beverages, enforces the state underage drinking laws, and state and federal drug laws. The Drug Free Awareness Initiative includes the providing of material on drug awareness and abuse with a copy of the report. The hotlines and off-campus resources are posted in the classroom. Please see Community Resources Section of this document.
- On-campus drug or alcohol counseling, treatment, or rehabilitation programs are not available at Metro Beauty Academy. Please reference the Community Resources Section of this document.
- Penalties may be imposed on students and employees for drug abuse violations occurring on campus include:
 - Notification of the abuse to the proper authorities;
 - A Leave of Absence from enrollment/employment during which time the individual must consider the responsibilities of his/her enrollment/employment; become free from any dependencies and prove it; and, certify that if he/she is reinstated, that he/she will no longer participate in abuse activities that affect performance;
 - Expulsion or termination will be considered, based on the circumstances surrounding the violation.
- Any action taken by Metro Beauty Academy against a violation of the drug-free workplace policy will occur immediately upon the administration obtaining such information. The school will notify the Department of Education within 30 days of an employee or student being involved in any criminal drug statute conviction, for a violation occurring in the workplace.

Community Resources

- Off-campus services regarding Drug Abuse Information and Treatment, Crisis Intervention, Counseling, and Mental Health include:
 - National Domestic Violence Hotline: 800-799-SAFE (7233)
 - The National Help Line: 1-800-662-HELP(4357) (Substance Abuse and Mental Health Services)
 - National Sexual Assault Hotline: 1-888-656-HOPE (4673)
 - National Sexual Violence Resource Center: 1-877-739-3895

Timely Warning and Emergency Notification System

When a Clery reportable crime may pose an ongoing threat, or when there is an emergency or (*serious, immediate and continuous situation with guidance from law enforcement*) dangerous situation that may pose a health or safety risk Metro Beauty Academy will issue a warning.

The Director of Education, Chief Financial Officer or Title IX Officer will issue warnings with guidance from local law enforcement. Those in the building will be notified by a school employee making an official announcement in each section of the building. Metro will also send an announcement via email to each student and faculty member. Metro Beauty Academy does not have a policy regarding notification about missing students.

Emergency Response and Evacuation

- In the event of an Emergency requiring evacuation of the building (fire, bomb threat, gas leak, electrical hazard, etc) a staff member will announce for all students and clients to exit the building according to the evacuation plan. An Emergency Alert may include a fire alarm sounding, a whistle blowing, or an announcement by a staff member.
- Immediately proceed to your nearest emergency exit according to the evacuation plan.
- Before leaving the building, the following procedure should be followed:
 - Follow the posted evacuation route to exit the building.
 - Walk, do not run; talk quietly; do not stop to obtain items from lockers; do not clock in or out; do not go to cars; no smoking.
 - Students will pick up the client ticket (for the purpose of accounting for all individuals at the safe zone) and instruct clients to accompany the group.
 - Admissions, Financial Aid, and Front Desk staff will escort any visitors in their area out.

- Instructors will pick up class roster (for the purpose of accounting for all individuals at the safe zone) and ensure that all students leave the building.
- Staff members will check all areas to ensure that the building is evacuated, turning off lights and closing doors as each area is cleared.
- At the designated safe spot staff will take student roll call, and check student tickets to ensure that everyone is accounted for. The building should be cleared in three minutes.
- For fire or evacuation drills, the Owners, Administrator, or Manager will time the clearing of the building and be responsible for checking all rooms after the building is clear and calling
- In the event of an actual emergency, the Owners, Administrator, or Manager will be responsible to call 911.

Student/Employee Signature: _____

Date: _____

Student/Employee Name: _____