

Advanced Institute of Hair Design, Inc. (Greenfield)

Campus Crime and Annual Security Report

Advanced Institute of Hair Design, Inc., doing business as VICÍ Beauty School, prepares this report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act. The report is prepared in cooperation with the local law enforcement agencies surrounding our campus.

TO REPORT A CRIME

Contact a school official or call Penny Rushing at (414) 525-6300 (non-emergencies) or dial 9-1-1 (emergencies only). Any suspicious activity or person seen loitering inside or around the Institute buildings should be reported.

Campus Crime Statistics

Offense	On Campus			Public Property		
	2015	2016	2017	2015	2016	2017
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0
Negligent Manslaughter	0	0	0	0	0	0
Sex Offenses – Forcible	N/A	N/A	N/A	N/A	N/A	N/A
Rape	0	0	0	0	0	0
Fondling	0	0	0	0	0	0
Sex Offenses - Non-Forcible	N/A	N/A	N/A	N/A	N/A	N/A
Incest	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0
Robbery	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0
Burglary	0	0	0	0	0	0
Motor Vehicle Theft (does not include theft from a motor vehicle)	0	0	0	0	0	0
Arson	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0
Larceny-Theft	1	0	0	0	0	0
Intimidation	0	0	0	0	0	0
Destruction/damage/vandalism of property	0	0	0	0	0	0
Liquor Law Arrests	0	0	0	0	0	0
Liquor Law Violations Referred for Disciplinary Action	0	0	0	0	0	0
Drug Abuse Arrests	0	0	0	0	0	0
Drug Abuse Violations Referred for Disciplinary Action	0	0	0	0	0	0
Weapons: Carrying, Possessing, etc Arrests	0	0	0	0	0	0
Weapons: Carrying, Possessing, etc Violations Referred for Disciplinary Action	0	0	0	0	0	0
Hate Crimes	0	0	0	0	0	0
Domestic Violence	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0
Stalking	0	0	0	0	0	0
Total Unfounded Crimes	0	0	0	0	0	0

Safety & Security Information

Campus Security Procedures

Campus safety and security are important issues at VICÍ Beauty School. Our goal is to provide students with a safe environment in which to learn and to keep students, parents, and employees 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 provide students and families with the information they need to make informed decisions. The following policies and procedures are established to comply with the Clery Act.

Timely Warnings

A timely warning to the campus community is distributed regarding any of the above listed crimes (see "Campus Crime Statistics") which are deemed to represent a threat to the students and employees, and which are reported to campus officials. The campus crime alert is issued in a manner that is timely and will aid in the prevention of similar crimes. The manner of dissemination to alert the campus community may include one or more of the following methods: e-mail, text messages, and/or voicemail. In addition, campus officials will post relevant warnings, updates and advisories on the school website (www.vicibeautyschool.com) and may also utilize campus bulletin boards and its Facebook page. Campus officials may decide to issue an alert about a crime occurring off-campus but in a location frequented by students, even though such a crime would not be included in the annual report. Anyone with information warranting a timely warning should report the circumstances in person to a school official or to Penny Rushing at 414-525-6300. Local police will be contacted if necessary.

Reporting the Annual Disclosure of Crime Statistics

VICÍ Beauty School prepares this report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act. This report is prepared in cooperation with the local law enforcement agencies around our campus.

Campus crime, arrest and referral statistics include those reported to the local police department, designated campus officials, and other law enforcement agencies. Each year, this information is distributed to all enrolled students and employees, and it is also available at:

<http://vicibeautyschool.com/wp-content/uploads/2018-South-Crime.pdf>

Reporting of Criminal Offenses

Contact a school official or Penny Rushing at (414) 525-6300 (non-emergencies) or dial 9-1-1 (emergencies only). Any suspicious activity or person seen loitering inside or around the school buildings should be reported. All reports will be investigated. Violations of the law will be referred to law enforcement agencies. When a potentially dangerous threat to the school community arises, timely reports or warnings will be issued through in-school announcements, postings on the bulletin board located in the student lounge, and any other means deemed appropriate by management.

For off campus options, contact the Greenfield Police Department at (414) 761-5300 (non-emergencies). You should always dial 9-1-1 for emergency situations.

The Greenfield Police Department encourages anyone who is the victim or witness to any crime to promptly report the incident to the police.

Confidential Reporting

VICÍ Beauty School encourages anyone who is the victim or witness to any crime to report the incident as soon as possible. All reports will be investigated. The school does not have procedures for voluntary, confidential reporting of crime statistics. Violations of the law will be referred to the local Police Department. When a potentially dangerous threat to the school community arises, timely reports or warnings will be issued through in-school announcements, postings on the bulletin board located in the student lounge, and any other means deemed appropriate by management.

Access Policy

During business hours, VICÍ Beauty School is open to the public. During non-business hours access to the facility is by key and security code, or admittance by authorized school officials.

Campus Security Authority and Jurisdiction

VICÍ Beauty School's administration attempts to provide a safe, secure educational environment for all students and employees. The school does not provide security guards on its campus premises. School officials have no law enforcement powers and will contact the local Police Department as needed.

Security Awareness Programs

All new enrolled students participate in a general school orientation class. During the orientation, the procedure for reporting emergencies and criminal activities is discussed. In addition, information may be disseminated to students and employees through tips posted in the school buildings, in-class announcements, and other means deemed appropriate by management. We do not offer programs designed to inform students and employees about crime prevention.

Criminal Activity Off Campus

VICÍ Beauty School does not provide law enforcement services to off-campus activities.

Emergency Response & Evacuation

In the event of an emergency, (fire, bomb threat, tornado, etc) the Campus Administrator will declare the emergency and the school will immediately call for assistance from the local police/fire. If necessary, notifications will be sent to students and staff via e-mail, text and/or notice on our website. The institution will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to or otherwise mitigate the emergency.

If an emergency situation should occur, students, staff and clients must:

1. Evacuate the building immediately in an orderly fashion, unless instructed to remain indoors for an emergency outside the building.
2. Assist the clients who may need help.
3. Walk to the far ends of the parking lot, unless instructed to remain indoors for an emergency outside the building.
4. DO NOT try to grab personal belongings.
5. If you have evacuated the building, DO NOT try to re-enter the building until staff members or fire/police officials have given clearance.

From time to time, the school may conduct fire and/or tornado drills. Everyone must follow normal procedures in evacuating the building during a fire drill. REMEMBER: in any emergency situation be CALM, COURTEOUS AND LISTEN TO INSTRUCTIONS.

Domestic Violence, Dating Violence, Stalking and Sexual Assault Prevention and Responses

Sexual harassment may include, but is not entirely limited to, sexual assault, domestic violence, dating violence and stalking, as defined below:

Sexual Assault is a form of sexual harassment. A range of conduct falls into the category of sexual assault, including without limitation sexual violence, sexual battery, sexual coercion, rape, or other sexual contact involving force, threat, intimidation, or without consent.

Consent means informed, freely given agreement, communicated by clearly understandable words or actions, to participate in each form of sexual activity. Consent cannot be inferred from silence, passivity, or lack of active resistance.

Domestic Violence means a felony or misdemeanor crime of violence committed by:

- a current or former spouse or intimate partner of the victim,
- a person with who a victim shares a child in common,
- a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner,
- a person similarly situated to a spouse of the victim under the domestic or family violence laws of the State of Wisconsin, or
- 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.

Dating Violence means violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim; and where the existence of such a relationship shall be determined based on a consideration of the following factors:

- the length of the relationship;
- the type of relationship; and
- the frequency of interaction between the persons involved in the relationship.

For the purposes of this definition—

- Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.
- Dating violence does not include acts covered under the definition of domestic violence.

Stalking means engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- fear for his or her safety or the safety of others; or
- suffer substantial emotional distress.

A video that raises awareness about sexual assault is shown during new student orientation. If you are a victim of sexual assault, domestic violence, dating violence, or stalking at VICÍ Beauty School, your first priority should be to get to a place of safety. You should obtain medical treatment, if necessary. VICÍ Beauty School strongly advocates that a victim of domestic violence, dating violence, stalking, or sexual assault report the incident in a timely manner to a school official, such as the Campus Administrator. Time is a critical factor for evidence collection and preservation. Reporting to school officials will not obligate the victim to prosecute, nor will it subject the victim to scrutiny or judgmental opinions. Filing a police report will:

- Ensure that a victim receives necessary medical treatment and tests, at no expense to the victim,
- Provide the opportunity for collection of evidence helpful in prosecution, which cannot be obtained later, and
- Assure the victim has access to free confidential counseling from counselors specifically trained in the area of sexual assault crisis intervention, domestic violence, dating violence, and stalking.

When a victim contacts a VICÍ Beauty School official, the Greenfield Police Department will be notified unless the victim specifically requests the school not to; the school will require that request to be in writing. In cases where the accused is another student or an employee of VICÍ Beauty School, the victim may choose for the investigation to be pursued through the criminal justice system and the school's disciplinary procedures, or only the latter. School officials will guide the victim through the available options and support the victim in his or her decision.

Where the accused is another student or an employee of VICÍ Beauty School, the school will provide a prompt, fair and impartial investigation and resolution. The accuser and the accused are entitled to the same opportunities to have others present during a disciplinary proceeding. Both the accuser and the accused must be informed of the outcome of any institutional disciplinary proceeding, in writing. The school will use the preponderance of the evidence standard to the factual allegations. For the purpose of this paragraph, the outcome of a disciplinary proceeding means only the institution's final determination with respect to the alleged offense and any sanction that is imposed against the accused. VICÍ Beauty School's disciplinary process is detailed in the student handbook. A student or employee found guilty of sexual or any other misconduct could be criminally prosecuted in the courts and may be suspended or expelled or have their employment terminated. Our institution is obligated to comply with a student's request for assistance with an academic, living, transportation and/or working situation change following an *alleged* sexual assault, if such change is reasonably available.

Counseling options are available through a number of agencies including:

- **National Domestic Violence Hotline 1-800-799-SAFE (7233)**
- **National Sexual Assault Hotline 1-800-656-HOPE (4673)**
- **National Women's Health Information Center**
 - www.womenshealth.gov/files/documents/fact-sheet-sexual-assault.pdf

Sexual Offender Registration

VICÍ Beauty School is providing information for students and employees to obtain information regarding registered sex offenders. The Wisconsin Sex Offender registry can be found at:

<http://wisconsin.docfamilywatchdog.us/>

Drug & Alcohol Abuse Prevention

Illegal drugs or alcoholic beverages are not allowed on the premises of any cosmetology school in the State of Wisconsin. Any student found having possession of, sale of, or under the influence of drugs and/or alcohol while on school premises, including the parking lot, will be terminated immediately, and may also be subject to local, state and federal prosecution and legal sanctions. This also includes prescription drugs which may alter the mind and/or motor skills. Additional information, including health risks associated with the use of illicit drugs and the abuse of alcohol, along with drug and alcohol counseling and treatment information, can be found at:

<http://www.dhs.wisconsin.gov/substabuse/>

Our schools adhere to the Drug-Free Workplace Act of 1988 (Public Law 101-226)

- 34 CFR 84 Government-Wide Requirements for Drug-Free Workplace
- 34 Part 86 Drug and Alcohol Abuse Prevention
- 34 CFR 668.14(c)

VICI Beauty Schools

Policy Statement on Domestic Violence, Dating Violence, Stalking, and Sexual Assault

VICI Beauty Schools prohibits the offenses of domestic violence, dating violence, stalking, and sexual assault. A student or employee who reports to the School that they have been a victim of domestic violence, dating violence, sexual assault or stalking, whether the offense occurred on or off campus, shall be provided with a copy of this Policy, which contains a written explanation of the student's or employee's rights and options available under clauses (ii) through (vii) of subparagraph (B) of the "Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act."

Programs

In order to help prevent domestic violence, dating violence, stalking, and sexual assault, the School educates the student community about matters such as domestic violence, stalking, sexual assaults, rape, acquaintance rape, dating violence, including date rape, through its mandatory new student orientation program prior to each class start, and during orientation of new employees. The education programs include primary prevention and awareness programs and include:

- a) A statement that the School prohibits the offenses of domestic violence, dating violence, stalking, and sexual assault;
- b) The definitions of domestic violence, dating violence, stalking, and sexual assault in Wisconsin;
- c) The definition of consent, in reference to sexual activity, in Wisconsin;
- d) Safe and positive options for bystander intervention that may be carried out by an individual to prevent harm or intervene when there is a risk of domestic violence, dating violence, stalking, or sexual assault against a person other than such individual;
- e) Information on risk reduction to help individuals recognize warning signs of abusive behavior and how to avoid potential attacks; and
- f) This Policy Statement, which includes the required information in clauses (ii) through (vii) of (8)(B) of §485(f) (20 U.S.C. 1092(f));

The Office of Human Resources also offers the above information in items (a) through (f), on domestic violence, dating violence, stalking and sexual assault to School students and employees on a continuing basis, through prevention and awareness campaigns for students and employees, and also makes such information available upon request. Literature on date rape education, domestic violence, sexual assault, stalking, and prevention and risk reduction in regard to these behaviors and the School's response in the event a complaint is made regarding such behaviors, is available through the Office of Human Resources.

Procedure

If you are a victim of domestic violence, dating violence, sexual assault, or stalking at the School, your first priority should be to get to a place of safety. You should then obtain necessary medical treatment. It is important that any evidence of any such actions be preserved as the evidence may be necessary to prove criminal domestic violence, dating violence, sexual assault, or stalking, or to obtain a personal protection order. The School strongly advocates that a victim of domestic violence, dating violence, stalking, or sexual assault report the incident in a timely manner. The School will protect the confidentiality of

victims, to the extent permissible by law. For example, a victim's name and other identifying information about the victim will not be contained in publicly-available records, to the extent omitting such information is permitted by law. Time is a critical factor for evidence collection and preservation. An assault should be reported directly to the School Campus Administrator or the School's Title IX Coordinator. A victim also has the option to notify proper law enforcement authorities such as the Greenfield Police for students at our Greenfield Campus, or the Glendale Police for students at our Bayshore Town Center Campus, or the Milwaukee County Sheriff's Department. If the victim chooses, campus authorities will assist the victim in notifying law enforcement authorities, however, the victim may choose to decline to notify such authorities. Filing a report with a School official will not obligate the victim to notify law enforcement authorities or to prosecute, nor will it subject the victim to scrutiny or judgmental opinions from officers. Filing a report will:

- ensure that a victim of domestic violence, dating violence, stalking, or sexual assault receives the necessary medical treatment and tests, at no expense to the victim;
- provide the opportunity for collection of evidence helpful in prosecution, which cannot be obtained later;
- assure the victim has access to free confidential counseling from counselors specifically trained in the area of domestic violence, dating violence, stalking, and sexual assault crisis intervention.

In Wisconsin, a victim of domestic violence, dating violence, stalking, or sexual assault has the right to apply to the civil court for a personal protection order or a restraining order against the accused individual. The School does not provide legal services in regard to any such legal proceedings, as it is not equipped to do so, however, the School will refer a victim who wishes to pursue such legal action to outside legal sources such as the Sojourner Family Peace Center in Milwaukee County or the Waukesha Women's Center in Waukesha County.

When a victim of domestic violence, dating violence, stalking, or sexual assault contacts the Campus Administrator or Title IX Coordinator, they will notify the appropriate Police Department or another appropriate Police Agency, unless the victim specifically requests that such notification not occur. In any event, the Title IX Coordinator will be notified. The victim of domestic violence, dating violence, stalking, or sexual assault may choose for the investigation to be pursued through the School's accountability process through the Office of the Title IX Coordinator or Human Resources Department, as applicable, and the criminal justice system, or only through the School's disciplinary process. The School's Title XI Coordinator will guide the victim through the available options and support the victim in his or her decision. Various counseling options are available from private agencies in the area and referrals can be made to support services in the community, including legal assistance through such agencies as the victims' assistance program at the office of the Milwaukee County District Attorney and other community organizations.

Disciplinary Proceedings

The School follows the procedures of the Campus Sexual Assault Victims Bill of Rights, and the Violence Against Women Reauthorization Act of 2013, in regard to victims of domestic violence, dating violence, stalking, or sexual assault. The School's disciplinary proceedings, as well as special guidelines for cases involving sexual misconduct, domestic violence, dating violence, and stalking are detailed in the Student Handbook and in the Employee Handbook. The disciplinary proceedings used by the School provide a prompt, fair, and impartial investigation and resolution of the matter, and will be conducted by

one or more School officials who receive annual training on issues related to domestic violence, dating violence, stalking, and sexual assault, and on how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability. The standard of evidence to be used will be the “preponderance of the evidence standard”, meaning that the School official(s) making the determination must be convinced, by a preponderance of the evidence, that it is more likely than not that the accused individual did engage in the behavior complained of by the victim. The accuser and the accused are both entitled to the same opportunities to have others present during a School disciplinary proceeding. Each will have the opportunity to be accompanied to any related meeting or proceeding by an advisor of their choice. A “proceeding” in regard to students, is defined as the School’s administrative disciplinary proceeding. In the case of employees involved in a matter covered by this policy, a proceeding is defined as an administrative hearing before the Director of Human Resources, or such other School staff or faculty member designated to handle such matters, who is qualified under the requirements of Title IX to be a hearing officer in such matters. In regard to students, Disciplinary proceedings are used in matters involving violations of School behavioral standards, including reported incidents of domestic violence, dating violence, stalking, and sexual assault. In regard to employees, the administrative hearing proceeding applies in matters involving reported incidents of domestic violence, dating violence, stalking, and sexual assault, and is not required for other employee disciplinary matters. A “proceeding” does not include communications and meetings between officials and victims concerning accommodations or protective measures to be provided to a victim.

The School determines the rules that will be used during any proceedings, whether the individuals involved are students or employees. In the case of domestic violence, dating violence, stalking, or sexual assault involving an employee, the disciplinary procedures will be handled through the Human Resources Department, using the same preponderance of the evidence standard referenced above. The ‘at-will’ nature of the employment relationship between the School and its employees, and the right of the School or an employee to end the employment relationship based upon that ‘at-will’ nature, will not be altered or eliminated by the procedures involved in an investigation or disciplinary proceeding into a reported incident of domestic violence, dating violence, stalking, or sexual assault, involving an employee.

As required by federal regulations, both the accuser and the accused will be simultaneously informed in writing of the outcome of any School disciplinary proceeding that arises from an allegation of domestic violence, dating violence, stalking, or sexual assault. The decision made by the School official(s) regarding the complaint will be in writing and contain the School’s procedures for the accused and the accuser to appeal the results of the disciplinary hearing, and the time at which the results become final. Compliance with these provisions does not constitute a violation of section 444 of the General Education Provisions Act (20 U.S.C. 1232g), commonly known as the Family Educational Rights and Privacy Act of 1974 (FERPA). If there is any change to the results that occurs prior to the time such results become final, both the accused and the accuser will receive written notification of such change.

Sanctions

A student found guilty of violating the School’s policy on domestic violence, dating violence, stalking, and sexual assault, could be criminally prosecuted in the state courts and may be suspended or expelled from the School. Other possible School disciplinary actions include being placed on probation, being restricted from being in certain areas and/or buildings on campus, being subject to a behavior plan, and being designated

persona non grata as to the School's campus. In the case of an employee, employment may be terminated immediately, at the discretion of the School, or an employee may be suspended either with or without pay, placed on probation pursuant to a last-chance agreement, or be subject to such other disciplinary action as the Human Resources Department determines to be appropriate.

Accommodations

Regardless of whether the victim chooses to report the crime to local law enforcement, if the victim so requests of the Title IX Coordinator, the victim will have the option to change their academic situation or assistance with financial aid matters after an alleged incident of domestic violence, dating violence, stalking, or sexual assault, if such changes are reasonably available. In the case of a student victim, the Title IX Coordinator will work with that individual to determine the reasonable availability of any such requested changes and will assist in arranging for those requested changes that are determined to be reasonably available. In the case of an employee victim, the Human Resources Department will work with that individual to determine the reasonable availability of any requested changes and will assist in arranging for those requested changes that are determined to be reasonably available.

The School requires that no officer, employee, or agent of the School shall retaliate, intimidate, threaten, coerce, or otherwise discriminate against any individual for exercising their rights or responsibilities under any provision of the "Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act", including the Violence Against Women Reauthorization Act, ("VAWA"), and the Sexual Violence Elimination Act, ("SaVE").

Counseling

The School does not provide professional or pastoral counseling services. However, information on available community resources, support services and legal services are available from the Title IX Coordinator and the Human Resources Office. Information is also posted on the student lunch room bulletin boards or by calling 2-1-1.

Confidentiality

VICI Beauty School instructors, administrative staff, admissions representatives and owners are classified as "responsible employees" and are required to report incidents (including personally identifying details) of domestic violence, dating violence, stalking, and sexual assault of a student or employee to the Title IX Coordinator/Director of Human Resources. VICI Beauty School customer service representatives, receptionists, housekeeping staff, custodial staff, dispense staff, temporary help, vendors, or employees or affiliated companies are not considered "responsible employees" and are therefore not required to make such a report.

Title IX Coordinator

Ron Thomas is VICI Beauty School's Title IX Coordinator and Director of Human Resources. He can be contacted at 414-525-6333 or ront@vici.edu.