

**ARNOLD'S BEAUTY SCHOOL
CAMPUS SECURITY REPORT
Publicly Distributed to Students and Staff 09/26/2018**

CAMPUS SECURITY AND RISK REDUCTION

Although we are fortunate to be in a low crime area, Arnold's has taken all the necessary precautions to insure staff, student and customer safety. Students are assigned a locker that they may purchase a lock for. Multiple security cameras monitor the interior and exterior of the campus. Our monitoring system is limited to the School's property at 1179 S. Second St. Students will review over the Campus Security Report, practice emergency procedures, and how to report a crime during orientation.

Arnold's Beauty School provides access to ongoing prevention and awareness programs and campaigns. Self-defense classes are conducted periodically and are available at request through the Milan Police Department at 686-3309. The local police and fire departments provide training to instructors for fire, active shooter and emergency drills. If a counselor is needed, Arnold's Beauty School can provide referrals for off-campus counseling services.

Although the campus does not employ security officers, local police patrol the area regularly, especially at closing times. The local police are very responsive to the needs of our school and investigate any reported crimes that occur on campus. The downtown parking surrounding the school is heavily trafficked and is well lit. Students should lock their car doors and keep valuables out of sight in their vehicles. An instructor will accompany students to their vehicles upon request.

Drugs, alcohol, firearms and other weapons are not allowed on campus. The Drug Prevention Policy must be read and signed during orientation with counseling procedures and resources listed. Pamphlets about drug and alcohol abuse, health issues, and domestic assault are available at the school.

CRIME REPORTING AND RESPONSE

Any crime witnessed by a student that takes place on the school campus or surrounding areas should be reported immediately to a school staff member (Senior Instructor and/or Director) and to the local police. By dialing 911 on any of the school phones, appropriate emergency personnel will be dispatched promptly. If any incidence is reported, Arnold's Beauty School will investigate the situation and act to address it. All witnessed crime reports are voluntary and confidential and reported on the Annual Crime Report.

There were no incidences of crime (except for minor instances of theft in 2015) for the previous 4 school years. Following is an individualized offense list. If crimes are reported, staff should be notified, and the police will be contacted if the victim chooses to. The crime will be voluntarily and confidentially reported and documented and determined if the incidence occurred on or off campus. If necessary, the institution will enforce any protective measures including "no-contact" orders, restraining orders, or other similar lawful orders issued by a criminal, civil or tribal court.

ANNUAL CAMPUS SECURITY REPORT

Campus Security Reports are conducted annually, and all information from local law enforcement, students, clients, or staff is confidential. Statistics are available to all staff and students in our Student Catalog. Students will review over the catalog during Orientation, including the Campus Security Report, Health and Safety Plans, and Emergency Procedures.

All information about victims and other necessary parties will be confidentially and voluntarily documented and secured in the school office files that only approved personnel have access to. The

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school will maintain the reporting parties' confidentiality so that the school will be able to provide accommodation or protective measures. If the reporting party needs assistance, or a request of changes to their academic situation, the school can provide accommodations at the victim's request. A written notification may be provided to the victim about their options.

Criminal Offenses on Campus

	2014	2015	2016	2017
Criminal Homicide including Murder/Negligent and Non-negligent manslaughter	0	0	0	0
Sexual Offenses including Rape/Fondling/Incest/Statutory Rape	0	0	0	0
Robbery /Burglary	0	3	0	0
Aggravated assault	0	0	0	0
Motor vehicle theft	0	0	0	0
Arson	0	0	0	0
Liquor Law Violations	0	0	0	0
Drug Law Violations	0	0	0	0
Illegal Weapons Possessions	0	0	0	0
Dating Violence including domestic violence and stalking	0	0	0	0
Hate Crimes including all primary crimes listed above, larceny-theft, simple assault, intimidation	0	0	0	0

FIRE REPORT

There have been no fires or reports of fires at Arnold's Beauty School. Arnold's Beauty School's campus does not provide student housing. Annual Fire Safety Reports for student housing are not applicable.

TN SEX OFFENDERS

Information about registered sex offenders is available at <https://www.tn.gov/tbi/general-information/redirect-tennessee-sex-offender-registry-search/sex-offender-registry-search.html>.

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STUDENT EMERGENCY CONTACTS

The school maintains a personal file on each student with information regarding their physician, an emergency name and telephone number, their home phone number and address, and a notation of any health problems or medications take by the student on a regular basis. The school advises medical assistance when deemed necessary with the student being financially responsible. First Aid kits are located at the front desk, wax station, break room bathroom and office bathroom.

The procedure for reporting accidents/emergencies is as follows:

- 1) Contact 911 (if necessary)
- 2) Contact person indicated on Personal Interview
- 3) Complete Accident/Emergency form

HEALTH AND SAFETY PLAN

When an emergency or evacuation occurs, the Director or Financial Aid Officer will notify students, clients and staff of the situation. The Director and/or Financial Aid Officer will determine the appropriate segment of the campus community to receive a notification, determine the content of the notification and initiate the notification system of an intercom announcement. The school will consider the safety of the community, determine the content of the notification and initiate the notification system, unless issuing a notification will compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

Arnold's Beauty School maintains the following for the safety of its students, clients and staff:

1. **ORIENTATION AND RESPONSIBILITY:** Students and staff are briefed on emergency procedures during orientation. Students and staff will be responsible for assisting any clients in safety and emergency procedures. A map is located in each room to show exits, first aid kits, and fire extinguisher locations
2. **FIRST AID/ACCIDENT FORMS/WAIVERS:** A first aid kit is located in the reception area and the bathrooms. An eye wash station is in the Staff Breakroom. In case of an accident, a form must be filled out and reviewed by administration. All clients must sign a release from liabilities form before services are rendered.
3. **FIRE SAFETY:** Smoke detectors are placed throughout the building. Fire extinguishers are located in the Front Mannequin Room, Student Break Room, Lobby and Freshman Mannequin Room. In case of fire, all students will be notified immediately and instructed to proceed to the nearest exit, moving to the parking lot in front of the building. The Director or Senior Instructor will call roll to make sure all students have left the building.
4. **SEVERE WEATHER:** In case of severe weather conditions, the Director and/or staff will monitor the weather on Weather Apps on their phones and/or contact the local Gibson County Central Control, the

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Tennessee Highway Patrol and/or the Milan Police Department as to weather and road conditions.

Actions to be take will be as follows: a. **Severe thunderstorms, flooding, snow or ice:** Students will be informed of these conditions and excused to leave for home if necessary. If inclement weather, school may be cancelled and the students will be informed through text, calls or social media.

b. **Tornadoes:** in the event of a tornado warning, students, staff, and customers will go across the street to the FEMA Tornado Safe Room. In the case that the building is not available, all persons will assemble in the interior hallway of the school and Freshman classroom, and sit on the floor with the upper body bent forward with the arms covering the head until the storm has passed.

c. **Earthquake:** In the event of an earthquake, students, staff and customers will be instructed to get under a sturdy table (classroom) or door frame and brace themselves. Everyone will be instructed to stay clear of windows and mirrors or any other heavy objects that may fall.

5. **ROBBERY OR HOSTAGE SITUATION:** In case of robbery, hostage taking or other threatening persons present in the school; everyone will be instructed to remain as calm as possible, not making any sudden movements or cry out, follow the person's instructions and call 911 as soon as it is safe to do so.

6. **ACTIVE SHOOTER:** In case of an active shooter (from the Department of Homeland Security

a. Evacuate out of the nearest safe exit, leave belongings behind and keep hands visible. Call 911 as soon as you are safe.

b. If evacuation is unsafe, hide out of shooter's view, where you can lock and/or barricade the door. The Freshman Classroom and/or supply rooms are recommended.

c. As a last resort, and only if your life is in immediate danger, act to incapacitate the shooter.

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FIRST AID PLAN First aid supplies are always in stock and available at the front reception desk in the bottom drawer. There is also a first aid kit in the front bathroom under the sink, in the cabinet by the wax station, and in the staff office bathroom. Students are made aware of these locations during the first day orientation and informed of the steps to follow in case of an accident. A list of first aid supplies is as follows: Hydrogen peroxide Antibiotic Ointment Cotton balls Band-aids Q-tips Gloves Disposable bags

ACCIDENT FORM POLICY

Accidents can be injury to clients, staff and/or students. For cuts, burns, falls, and any other injury, staff must ensure an accident form is filled out. The accident forms, located in the staff office, must be filled out with all appropriate information and is available to students, staff, and customers. Accidents are followed up by the Director to ensure all information is correct. Action is taken accordingly. In case of absence of the Director the Financial Aid Officer and/or the Supervisor of Instruction will be responsible for following the Health and Safety Plan.

CLIENT WAIVER POLICY

Because all services are performed by students, a client must fill out a form to agree that Arnold's Beauty School is not liable for any accidents, burns, scratches, cuts, etc. On the clinic floor, signs are posted that state all services performed "at your own risk" by students.

EMERGENCY DRILLS

Fire, tornado, earthquake, robbery and active shooter drills will be conducted annually. All students will be given this plan along with a demonstration during the orientation process. Emergency drills may or may not be announced.

DOMESTIC ASSAULT, DATING VIOLENCE, SEXUAL ASSAULT, STALKING

Instructors will discuss prevention and awareness of dating violence, domestic violence, sexual assault and stalking. Terms such as these will be discussed:

1. **Dating Violence-** violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim
2. **Domestic violence-** a felony or misdemeanor crime of violence committed-
 - a. By a current or former spouse or intimate partner of the victim
 - b. By a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner
 - c. By a person who is cohabitating with or has cohabitated with, the victim as a spouse or intimate partner
 - d. 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
 - e. By any other person against an adult or youth victim who is protected from that person's acts under domestic family violence laws
3. **Sexual Assault** – An offense that meets the definition of rape, fondling, incest, or statutory rape
4. **Stalking** – Engaging in a course of conduct directed at a specific person that would cause a reasonable person to
 - a. Fear for the person's safety or the safety of others
 - b. Suffer substantial emotional distress

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5. **Consent** - permission for something to happen or agreement to do something
6. **Bystander Intervention**- safe and positive options that may be carried out by an individual or individuals to prevent harm or intervene when there is a risk of dating violence, domestic violence, sexual assault, or stalking. It includes recognizing situations of potential harm, understanding institutional structures and cultural conditions that facilitate violence, overcoming barriers to intervening, identifying safe and effective intervention options and acting to intervene.
7. **Risk Reduction** – options designed to decrease perpetration and bystander inaction, and to increase empowerment for victims to promote safety and to help individuals and communities address condition that facilitate violence.
8. **Annual Crime Report** – will be discussed with all students including criminal homicide, murder and nonnegligent manslaughter, negligent manslaughter; sex offences including rape, fondling, incest, and statutory rape; robbery, aggravated assault, burglary, motor vehicle theft, arson, and drug, alcohol and weapon violations.

INTERNAL PROCEDURES FOR INCIDENCES OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING FOR STUDENTS AND STAFF

When a report of a potential incident of domestic violence, dating violence, sexual assault, or stalking is received, the Director/Financial Aid Officer will conduct a preliminary assessment of the available information.

The preliminary assessment may include the following:

1. Evaluating whether the report provides identifying information for the Complainant, Respondent, and/or witnesses to the reported incident
2. Conducting a Preliminary Investigation by gathering additional information from the Complainant, Respondent, and/or witnesses to the reported incident to assess the need for additional action by the School
3. Contacting the Complainant, if identified, to provide written information regarding the following:
 - a. The School's commitment to providing support and resources to survivors of dating violence, domestic violence, sexual assault, and stalking
 - b. The Complainant's right to seek medical treatment, as well as an explanation of the importance of preserving forensic and other evidence
 - c. The Complainant's option to make a report—or to refuse to make a report—to law enforcement, as well as the potential of obtaining a Protection from Abuse or Sexual Violence Protection Order
 - d. The Complainant's right to invoke formal or informal School's disciplinary/resolution processes in connection with their experience, as well as an explanation of what the formal and informal procedural options entail and the Complainant's rights under each
 - e. The Complainant's right to request appropriate remedial and protective measures, and an explanation of how to request those measures, including:
 1. "No Contact" Directives or Agreements
 2. Academic accommodations
 3. Transportation assistanceAll other accommodations are not applicable to our school

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- f. The school's policy prohibiting retaliation, and its commitment to take prompt action in response to reports of retaliation
 - g. The Complainant's right to meet with the Director/Financial Aid Officer to discuss their situation, including the procedural options, resources, and support services that may be available in connection with the Complainant's experience
 - h. The Complainant's right to be accompanied by an advisor of their choosing to any meeting or interview conducted in connection with the reported incident
4. Contacting the Respondent or other witnesses to obtain additional information regarding the reported incident
5. Communicating with the Milan Police Department if a reported incident triggers obligation under the Clery Act or child abuse reporting laws. If the Complainant is willing, the Director or Financial Aid Officer will meet with the Complainant for an initial discussion of the Complainant's need for support and/or accommodations, as well as their preference for pursuing formal or informal School disciplinary processes. Possible outcomes of an initial discussion with a Complainant can include the following:
- a. The Complainant may wish/agree for the school to proceed with a Preliminary Investigation or informal process only, which may include contacting the Respondent or other witnesses to gather additional information or discuss the reported incident and to assess appropriate next steps. The Complainant will be eligible for appropriate accommodations, and appropriate protective/remedial measures may be provided. The Complainant will also be informed that they may request that the school take formal action in response to the reported incident at a later date. It will also be explained that, while there is no deadline for requesting to invoke the school's formal processes in response to an incident of dating violence, domestic violence, sexual assault, or stalking, the passage of time may impact the school's ability to gather information related to the incident. A timeline for next steps will be reviewed. The Complainant will be advised that there may be occasions where the school determines that additional formal or informal resolution processes are required, even if the Complainant does not express a desire to engage in additional process. The Complainant will be informed of the process by which the University makes such determinations and will be kept apprised of any decision-making processes as they take place.
 - B. The Complainant may request that the School proceed with the formal process. The Complainant will be eligible for appropriate accommodations, and appropriate protective/remedial measures may be provided. Additional information necessary to proceed with the formal process will be obtained. A timeline for next steps will be reviewed and when appropriate, additional meetings scheduled.
 - C. The Complainant may express uncertainty as to what protective/remedial measures or procedural options they want or need such cases, whenever possible, the Complainant will be provided some reasonable period to consider their options and communicate whatever needs/preferences they may have. A timeline for next steps will be reviewed and when appropriate, additional meetings scheduled.
 - D. The Complainant may request that the School keep their identity confidential,

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which may include a request that the School decline to proceed with any additional fact-gathering, or formal or informal resolution processes with respect to the reported incident. In such instances, the Complainant will be advised of the "Requests for Confidentiality" procedures set forth below, and the School will follow these procedures in evaluating the Complainant's request and in taking appropriate action. If a decision is reached to institute formal or informal School resolution processes, or to impose remedial or protective measures that will affect the Respondent, the Respondent will be notified of the proposed action by the Director and/or Financial Aid Officer and will receive written notification of the available procedural options and resources available to them through the School and relevant community agencies. If a determination is made to honor or not honor a request from a complainant, the Director/Financial Aid Officer will communicate to the Complainant in a prompt and sensitive manner. The complainant will be informed at that time of any additional steps they can take.

Preliminary Investigations, and Formal and Informal Resolution Procedures for Reports of Alleged Domestic Violence, Dating Violence, Sexual Assault, and Stalking Involving Students
Preliminary Investigation

During a preliminary investigation into a report of potential dating violence, domestic violence, sexual assault, or stalking, or when an informal resolution process is requested by a Complainant, the Director/Financial Aid Office will contact the Respondent to schedule a meeting. In that meeting, the staff member will:

1. review the rights of the Respondent (including available resources, accommodations, and support options, as well as the right to be accompanied by an advisor of their choosing to any meeting or interview conducted in connection with the reported incident);
2. review the alleged details of the reported incident, as appropriate; and
3. solicit the Respondent's perspective on the allegations

Informal Resolution Process

If the Complainant has expressed a desire to proceed with an informal resolution process, the staff member may also discuss with the Respondent:

1. actions requested by the Complainant, as appropriate; and
2. actions recommended by the School.

If, following the discussion, the Respondent voluntarily agrees to participate with the actions necessary to honor the Complainant's and School's requests, steps will be taken to complete those actions in a prompt and timely manner. Examples of requests include, but are not limited to, counseling for the Respondent, commitment to change/end the behavior, restricted activity, schedule modification, and educational intervention. The Complainant will be notified of the Respondent's agreement and appropriate documentation will be maintained. No reportable disciplinary record is created; however, the information will remain on file should future concerns be reported.

If the Respondent is not willing to honor the requests of the Complainant or the University, a follow-up meeting will be held with the Complainant to determine next steps. In addition, even if the Complainant initially expresses a desire to engage in the informal resolution process only, they may choose to invoke the School's formal resolution processes later.

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Formal Resolution Process Proposed Timeline and How to File a Complaint

A Complainant may issue a formal complaint with respect to an alleged incident of dating violence, domestic violence, sexual assault, or stalking in person, electronically, or via phone, by contacting the Arnold's Beauty School's Financial Aid Officer

Phone: 731-686-7351

E-mail: abs1179@bellsouth.net

If a Complainant issues a formal complaint, or if the school decides to conduct a formal investigation, the school will initiate a prompt, thorough, fair, and impartial investigation and resolution process. Reports will be investigated and managed by the Financial Aid Officer and/or Director who have been trained annually on issues related to domestic violence, dating violence, sexual assault, stalking, and victimization, and on how to investigate and hearing process that protects the safety of victims and promotes accountability.

The school will observe the following procedures in conducting the formal resolution process, and will strive to complete any formal resolution process, up to and including a determination of responsibility and assignment of sanctions, within 60 business days of its initiation. If circumstances require that the proposed 60-day timeline be extended in any case, both parties will be notified of the extension and the reason it is being sought.

Formal Investigations

Formal Investigations will be conducted by trained investigators designated by the Financial Aid Officer/Director. When a formal investigation process is initiated, the assigned investigator will attempt to gather whatever relevant information may be reasonably available regarding the alleged incident. This may include interviewing the Complainant, Respondent, and/or any other witnesses who are identified during the investigation, as well as gathering available documentary, electronic, or physical evidence. Parties will be provided with adequate notice of the investigation and a meaningful opportunity to be heard.

After the investigation, the assigned investigator will prepare a draft Investigative Packet, which will contain all material information gathered during the investigation and being put forward for consideration in determining whether to hold the Respondent responsible for the alleged incident. The draft Investigative Packet will not contain any findings of responsibility/non-responsibility. The assigned investigator will attempt to complete his or her investigation, including the completion of the draft Investigative Packet, within 35 business days of initiation. If circumstances require that the proposed 35-day investigative timeline be extended in any case, both parties will be advised of the extension and the reason it is being sought.

The Complainant and Respondent will be provided with an opportunity to meet with the assigned investigator to review the draft Investigative Packet, submit additional information or comments, identify additional witnesses or evidence for the investigator to pursue, and submit any additional questions that they believe should be asked of any other party or witness. The parties will have up to 5 business days to submit any additional questions or follow-up after reviewing the draft Investigative Packet. Once the parties have responded to the draft Investigative Packet or the 5 business days have elapsed, the assigned investigator will review and address any questions or follow-up submitted by the parties in response to the draft Investigative Packet, as appropriate.

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This may include conducting additional investigation. The assigned investigator will then incorporate any revisions or new information into a final Investigative Packet within 5 business days, if possible. The parties will be provided with an opportunity to review any new information that is added to the Investigative Packet before it is finalized, and a recommendation will be made.

Processes for Determining Responsibility

Whenever a final Investigative Packet is reviewed, if the information reasonably supports a School Rules violation, the school may recommend charges and disciplinary actions to the Respondent. If information in the Investigative Packet does not reasonably support a School Rules violation, then the case will be closed without charges.

Notification of Determination and the Right to Appeal

Both the Respondent and the Complainant will be notified simultaneously, in writing, of the decision once the written outcome has been decided by the school. The Respondent and the Complainant will also be notified, in writing, of the appeal procedure, of any change to the decision that occurs prior to the time that the decision becomes final, and when the decision becomes final. If suspension or termination is determined as the disciplinary action, both the Complainant and the Respondent will have the opportunity to file an appeal. After any appeal process, both the Complainant and the Respondent will be notified simultaneously, in writing, of the outcome.

Burden of Proof

As noted, the standard of evidence for determining whether a violation occurred, specifically when investigating alleged domestic violence, dating violence, sexual assault, and stalking, is "preponderance of evidence."

Following a final determination of an institutional procedure regarding domestic violence, dating violence, sexual assault or stalking, the school may issue disciplinary measures that include:

- **WARNING:** A warning is an indication to a respondent that his/her conduct violated the School Rules and that further misconduct will result in more severe disciplinary action.
- **SUSPENSION:** Disciplinary suspension from Arnold's Beauty School is assigned for a specified period. A suspended respondent cannot participate in any class, practical work or receive any clock hours, or receive any scheduled work hours if an employee.
- **TERMINATION:** If a respondent is terminated from Arnold's Beauty School, they will no longer enrolled or employed, and cannot be reenrolled or rehired.

EVALUATION The Health and Safety Plan, including Accident and First Aid Policies, is evaluated annually at Advisory Board Meetings and is revised when needed based on the input from staff and students. The *Plans are located in the Policy, Procedures and Plans Notebook* in Office and at the Front Desk Color Bar. A suggestion sheet is included for any student or staff comments for change recommendations

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