SCHILLING-DOUGLAS SCHOOL OF HAIR DESIGN

2026 Annual Campus Safety and Security Report

09/09/2026 Date Report Prepared

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MESSAGE FROM THE SCHOOL DIRECTOR

On behalf of Schilling Douglas School of Hair Design, the safety and security of our campus is of utmost importance to us. We hope that you will find this report helpful as it regards your safety and security both on campus and off campus.

Victor David has been designated as the contact person for any issues relating to campus security. The school requests that students and employees report any criminal activity/actions to the individual designated. The designated individual will assist the student/employee in reporting the incident to local police authorities.

This information is provided to meet the requirements of the Jeanne Clery Disclosure of Campus Crime Statistics Act.

Statistics on crimes reported to the school for the past three years that occurred on campus, as well as arrests for selected offenses can be found in the following document.

This report has been prepared by schools Director and Assistant to the Director, using crime statistics that were collected from the school's crime log and from crime statistics provided to the school by request form the Newark police department. This report is prepared annually for release prior to October 1st each year.

The Schilling Douglas School of Hair Design campus is located at 211 Louviers Drive Newark DE 19711.

Thank you for taking the time to review this report. If you have questions or would like further information about safety and security at Schilling Douglas School of Hair Design, please contact Victor David at 302-737-5100.

Sincerely,

Victor David

Director

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REPORTING OF CRIMINAL ACTIONS OR OTHER EMERGENCIES

All crimes or emergencies should be reported to the School Director (campus security authority) or the Associate Director as soon as possible. In addition, to report a crime or emergency, the Newark police should be notified by dialing 911 or (302)366-7111. The school does not have its own police department or security personnel. Crimes reported to the school are recorder in the school crime log and maintained in the school office.

ACCESS TO FACILITY

Only the school director, associate director, administrator or instructor will open and close the school. During normal business hours the school will be open to students, parents, employees, contractors, guests and lab patrons. During non-business hours' access to the school is by key only. The student entrance is restricted by electronic keypad access during the school normal hours of operation. All guests' patrons, and visitors must enter the facility through the main entrance and check in at the reception desk. Individuals who do not have legitimate reasons for being on campus and refuse to leave may be subject to arrest.
The school does not have any campus residences.

MAINTENANCE AND SECURITY OF CAMPUS FACILITIES

Our parking facilities are well lit during hours of darkness when school is in session. The parking area is lit from dusk till dawn. The school encourages students to leave in groups and to not linger in the parking lot after dark. Staff members are available to escort students to their cars at night if necessary.
The school building is secured by an alarm system when the school is closed. The same system provides a direct calling button for local police, which can be used in case of an emergency. Common areas of the school are monitored and recorded 24 hours a day via the school's video surveillance system. The school classrooms are under constant video and audio monitoring.
Lockers are assigned to all students for use as a safe place to store personal belongings not in use in class or when class is not in session. Valuables should not be left unattended. Students must supply their own lock. Management will periodically open unmarked lockers.

EMERGENCY RESPONSE AND EVACUATION

EMERGENCY NOTIFICATION

Upon confirmation of a significant emergency the campus community will be notified without delay through the PA system and the schools app by the director/ associate director in his absence, unless issuing a notification will in the professional judgment of the responsible authorities' compromise efforts to assist a victim or to contain, respond to or otherwise mitigate the emergency.
Anyone interested in receiving campus alerts via the school's app should download the school's app from the appropriate app store for their device.
Students should also take responsibility for regularly checking their device for alerts.
The Director/Associate Director will be responsible for contacting the appropriate parties for confirmation of a real threat to the community, as well as updating the school's app and making the announcement on the PA system.
Christiana Hospital will be asked to confirm a serious virus outbreak.
The Newark Police Department will be asked to confirm a significant emergency situation.
Instructors will be asked to make the students aware of the situation after they have been informed by the director/associate director.

TIMELY WARNINGS

Schilling Douglas School of Hair Design will issue a warning when a serious incident occurs that causes an immediate threat to the campus including the occurrence of Clery Act Crimes. This warning will be made through the schools PA system. If the PA system is not available the director, associate director and/or instructors will go around to each class and inform them of the threat. An alert will also be sent on the school app to notify the campus community.

EMERGENCY EVACUATION PROCEDURE

This plan is to be followed in the event of an emergency situation which warrants complete evacuation of the school.

1. Contact the local authorities immediately, if possible. Dial 911 on the school phone. If this is not possible, use other means after completing the evacuation to contact the authorities. Immediately notify a school administrator or instructor of the event. If the event is deemed to pose a serious or continuous threat to the campus community, immediately begin the emergency evacuation.
2. Immediately perform a timely warning though the school's public addresses system. If for some reason this system is not operationally a staff member must personally notify each classroom instructor.
3. Classroom instructors: instruct all students to calmly exitthe building/classroom through the clearly marked emergency exits at the rear or front of the classrooms.
4. Lab Instructors: instruct all lab patrons and students in the lab to calmly exit the building through the front lab exit. In the event that the front exit is obstructed, direct the lab patrons and lab students to the front hallway exit or student entrance/exit in the rear of building.
5. All instructors: instruct all students to meet in the rear of the school, far enough from harm's way. This location may be moved to the student parking area or further if necessary.
6. Instructors: please make every attempt to ensure all student and lab patrons exit the building. Gather all applicable roll books for that time.
7. All staff should also gather at the assigned meeting place. At this time, staff should ensure that the local authorities have been contacted regarding this event.
8. Once the building is evacuated, take roll of all students at the meeting place. Use all applicable roll books to confirm complete evacuation of the school.
9. Please maintain all students at the meeting place and await further instructions from the localauthorities.
10. This plan is tested and reevaluated at least once annually through either an announced or unannounced evacuation drill.

EMERGENCY LOCKDOWN

This plan is to be followed in the event of an emergency situation which warrants a complete lockdown of the school.

1. If an immediate threat to the wellbeing of the staff, students or visitors of the school is identified, a page all intercom transmission should be made to alert all areas of the school to lock down. This alert should be forwarded to the office and laboratory areas, pending on the origination of the notice.

2. All areas should remain in lock down until an all-clear alert has been issued, or until law enforcement/rescue personal have responded and advise otherwise or the threat has become imminent and a decision to evacuate is prudent.

3. Classroom lockdown: Classroom doors should be locked, and all persons should move as far away fromthe access door as possible.

4. Laboratory lockdown: Reception area door should be locked and hallway access door should be locked. All persons in the laboratory should be directed to move to an area in the laboratory out of the sight lines of the access doors.

5. Office lockdown: Office access door should be check to ensure it is closed. This door remains locked at all times. All persons within the office area should move into an office and the office door should be secured/locked behind them.

The school will test and re-evaluate its emergency response and evacuation procedure at least once annually. This test may be announced or unannounced.

SECURITY AWARENESS AND CRIME PREVENTION PROGRAMS

The following is a list of the crime prevention programs employed by the Schilling-Douglas School of Hair Design

- **New Student Orientation**: Administrative staff participates in new student orientation held on the first day of class for all entering students. Campus safety and this security report is reviewed as part of the orientation program.
- **Lockers**: Individual lockers are provided to all students to secure their personal belongings while in attendance.
- **Electronic Alarm System**: The school has a campus wide security system that is monitored by an outside security company.
- **Video Surveillance System**: The school has campus wide video surveillance system. Video footage is available for live view and is recorded.
- **Statistics**: the school maintains statistics on crimes that were reported to the school for the past three years that occurred on-campus, on public property adjacent to the campus and non-campus property, as well as arrests for selected offensives. These statistics can be found in this report.

OFF-CAMPUS CONDUCT

Students are reminded that violations of local, state or federal law are subject to school action. As student may be subject to withdrawal or suspension from the school under certain circumstance.

The Schilling-Douglas School of Hair Design has no officially recognized student organizations with off campus locations.

CRIME LOG

The school maintains a crime log in the business office. The report denotes the nature of the crime, date and time the crime occurred and was reported, the general location and the disposition. The disposition is defined as; pending, judicial, referral or criminal arrest.

Below is a sample of the log.

Schilling-Douglas School of Hair Design
CRIME LOG

Nature	Case Number	Date/Time Reported	Date/Time Occurred	General Location	Disposition

CAMPUS CRIME STATISTICS 2023- 2025

Crime	Year	On-Campus property	Non-campus property	Public property	Unfounded	Hate Crimes
Criminal Offenses						
Murder/Non-Negligent Manslaughter	2023	0	0	0	0	0
	2024	0	0	0	0	0
	2025	0	0	0	0	0
Manslaughter by Negligence	2023	0	0	0	0	0
	2024	0	0	0	0	0
	2025	0	0	0	0	0
Sex Offenses	2023	1	0	0	0	0
	2024	0	0	0	0	0
	2025	0	0	0	0	0
Rape	2023	0	0	0	0	0
	2024	0	0	0	0	0
	2025	0	0	0	0	0
Fondling	2023	0	0	0	0	0
	2024	0	0	0	0	0
	2025	0	0	0	0	0
Incest	2023	0	0	0	0	0
	2024	0	0	0	0	0
	2025	0	0	0	0	0
Statutory Rape	2023	0	0	0	0	0
	2024	0	0	0	0	0
	2025	0	0	0	0	0
Robbery	2023	0	0	0	0	0
	2024	0	0	0	0	0
	2025	0	0	0	0	0
Aggravated Assault	2023	0	0	0	0	0
	2024	0	0	0	0	0
	2025	0	0	1	0	0
Burglary	2023	0	0	0	0	0
	2024	0	0	0	0	0
	2025	0	0	0	0	0
Motor Vehicle Theft	2023	0	0	0	0	0
	2024	0	0	0	0	0
	2025	0	0	0	0	0
Arson	2023	0	0	0	0	0
	2024	0	0	0	0	0
	2025	0	0	0	0	0
Larceny-theft	2023	0	0	0	0	0
	2024	0	0	0	0	0
	2025	0	0	1	0	0
Simple Assault	2023	0	0	0	0	0
	2024	0	0	0	0	0
	2025	0	0	1	0	0
Intimidation	2023	1	0	0	0	0

	2024	0	0	1	0	0
	2025	1	0	0	0	0
Destruction / Damage / Vandalism of Property	2023	0	0	0	0	0
	2024	0	0	0	0	0
	2025	0	0	0	0	0
Hate Crimes	2023	0	0	0	0	
	2024	0	0	0	0	
	2025	0	0	0	0	
VAWA Offenses						
Domestic Violence	2023	0	0	0	0	
	2024	0	0	0	0	
	2025	0	0	0	0	
Dating Violence	2023	0	0	0	0	
	2024	0	0	0	0	
	2025	0	0	0	0	
Stalking	2023	0	0	0	0	
	2024	0	0	0	0	
	2025	0	0	0	0	

ARRESTS AND DISCIPLINARY REFERRALS STATISTICS 2023-2025

Offense	Year	On-Campus Property	Non-Campus Property	Public Property	Unfounded
Arrests: Weapons: carrying, possessing, etc.	2023	0	0	0	0
	2024	0	0	0	0
	2025	1	0	0	0
Arrests: Drug Abuse Violations	2023	0	0	0	0
	2024	0	0	0	0
	2025	0	0	0	0
Arrests: Liquor Law Violation	2023	0	0	0	0
	2024	0	0	0	0
	2025	0	0	1	0
Disciplinary Referrals: Weapons: carrying, possessing, etc.	2023	0	0	0	0
	2024	0	0	0	0
	2025	0	0	0	0
Disciplinary Referrals Drug Abuse Violations	2023	0	0	0	0
	2024	0	0	0	0
	2025	0	0	0	0
Disciplinary Referrals: Liquor Law Violation	2023	0	0	0	0
	2024	0	0	0	0
	2025	0	0	0	0

HAZING INCIDENTS

Offense	Year	On-Campus Property	Non-Campus Property	Public Property	Unfounded
Hazing	2023	0	0	0	0
	2024	0	0	0	0
	2025	0	0	0	0

Hate Crimes:

Hate crimes are not separate, distinct crimes, but are traditional offenses motivated, in whole or in part, by the offender's bias. The offender's motivation would be determined to be, in whole or in part, to commit an offense because of a bias against a race, religion, disability, sexual orientation, gender identity or ethnic or national origin group.

CAMPUS CRIME STATISTICS GEOGRAPHY:

On-Campus property is the building space occupied and controlled by the school located within the Shoppes at Louviers and the parking areas designated within the Shoppes at Louviers for student and staff parking.
The school does not have or control any non-campus property.

Public property is the section of Paper Mill Road located directly in front and adjacent to the Shoppes at Louviers center.

SCHOOL POLICY

For students and employees

The School is committed to providing a work and school environment free of unlawful harassment or discrimination. In furtherance of this commitment, all students and employees are required to take our mandatory Sexual Harassment and Prevention Training

In an effort to keep the students and staff informed on security and crime prevention additional education on awareness of rape, acquaintance rape, domestic violence, dating violence, sexual assault, and stalking will be given to them in the fall of every year.

Campus security procedures will be presented at new student orientation. During orientation, crime awareness and prevention applicable to our campus will be presented to encourage each individual to take personal responsibility for their security and the security of others around them. Employees will be informed upon hire of procedures to prevent crime which are reviewed at least once per year during staff meetings.

Acts of Violence, Sexual Misconduct and sexual discrimination are all strictly prohibited at Schilling Douglas School of Hair Design and are subject to our progressive disciplinary policy. This policy applies to students, staff and third parties involved with Schilling Douglas School of Hair Design regardless of sexual orientation or gender identity. School policy prohibits harassment or discrimination based on race, religion, creed, color, national origin, ancestry, sex (including pregnancy, childbirth or related medical conditions), military or veteran status, physical or mental disability, medical condition, marital status, age, sexual orientation, gender, gender identity or expression, genetic information or any other basis protected by the federal, state or local law. Additionally, in accordance with Title IX of the Education Amendments of 1972, the School prohibits discrimination based on sex, which includes sexual harassment and sexual violence, and the School has jurisdiction over Title IX complaints.

The School's anti-harassment policy applies to all persons involved in the operation of the School, and prohibits unlawful harassment by any employee of the School, as well as students, customers, vendors or anyone who does business with the School. It further extends to prohibit unlawful harassment by or against students. Any employee, student or contract worker who violates this policy will be subject to disciplinary action. To the extent a customer, vendor or other person with whom the School does business engages in unlawful harassment or discrimination, the School will take appropriate corrective action.

As part of the School's commitment to providing a harassment-free working and learning environment, this policy shall be disseminated to the School community through publications, the School website, new employee orientations, student orientations, and other appropriate channels of communication. The School provides training to key staff members to enable the School to handle any allegations of sexual harassment or sexual violence promptly and effectively. The School will respond quickly to all reports, and will take appropriate action to prevent, to correct, and if necessary, to discipline behavior that violates this policy.

PROHIBITED CONDUCT

This policy strictly prohibits sexual or other unlawful harassment or discrimination as well as sexual violence, as defined above. Sexual or other unlawful harassment or discrimination includes any verbal, physical or visual conduct based on sex, race, age, national origin, disability or any other legally protected basis if:

i. submission to such conduct is made either explicitly or implicitly a term or condition of anindividual's education or employment;

ii. submission to or rejection of such conduct by an individual is used as a basis for decisions concerning that individual's education or employment;

iii. or it creates a hostile or offensive work environment, which means the alleged conduct is sufficiently serious to limit or deny a student's or ability to participate or benefit from the student's education program.

Unlawful harassment or discrimination may include racial epithets, slurs and derogatory remarks, stereotypes, jokes, posters or cartoons based on race, national origin, age, disability, marital status or other legally protected categories.

Sexual harassment is conduct based on sex, whether directed towards a person of the opposite or same sex, and may include explicit sexual propositions, sexual innuendo, suggestive comments, sexually oriented "kidding" or "teasing", practical jokes, jokes about or displays of obscene printed or visual material, questions about sexual fantasies, preferences or history, and physical contact such as patting, pinching, or intentionally brushing against another person's body. Gender-based harassment, including acts of verbal, nonverbal or physical aggression, intimidation, or hostility based on sex or sex-stereotyping are strictly prohibited, even if those acts do not involve conduct of a sexual nature.

Complaint/Grievance Procedure

If you believe that you have experienced or witnessed harassment or sexual violence, notify your instructor, supervisor, or the Title IX Coordinator as soon as possible after the incident. Do not allow an inappropriate situation to continue by not reporting it, regardless of who is creating the situation. No employee, contract worker, student, vendor or other person who does business with the School is exempt from the prohibitions in this policy. Supervisors will refer all harassment complaints to the Title IX Coordinator for student-related complaints and to the School Director if the complaint involves an employee. In order to facilitate the investigation, your complaint should include details of the incident or incidents, names of the individuals involved and names of any witnesses.
The school refers all campus law enforcement issues to the Newark Police (302)366-7110. The school does not have any campus-based security personnel.

All complaints involving a student will be referred to the campus's Title IX Coordinator. The Title IX Coordinator is listed below and has the responsibility of overseeing all Title IX complaints and identifying and addressing any patterns or systemic problems that arise during the review of such complaints.

Title IX Coordinators:
Gabriel Akinporoye
Student Services 302-737-5100 ext.102
gabriel@schillingdouglas.edu

Victor David, Director Directors Office
302-737-5100 ext.101
victor@schillingdouglas.edu

The School ensures that its employee(s) designated to serve as Title IX Coordinator(s) have adequate training on what constitutes sexual harassment, including sexual violence, and that they understand how the School's grievance procedures operate. Because complaints can also be filed with an employee's supervisor, these employees also receive training on the School's grievance procedures and any other procedures used for investigating reports of sexual harassment. Campus Security Authorities (CSA) at our school consist of the director, associate director, instructors, student services director and business office director. These individuals are responsible for reporting any Clery Act Crimes to the director and/or associate director in his absence. All employees receive training regarding their responsibilities as it relates to being a CSA. While crime on our campus is not a serious problem, all staff and students should be aware of unusual activity by unknown persons on the property. Any questionable or suspicious acts by strangers or other students or staff members should be immediately reported to the associate director and/or director in her absence. In the event that both the associate director and director are not immediately available the incident should be reported to an instructor whom will contact the associate director/director immediately for further action. Since the school does not have housing facilities or formal student organizations, it is not necessary to request notification by local police authorities of crime and activities engaged in by students at such locations. Upon receipt of a complaint from a victim of sexual misconduct the CSA's will provide the victim with a list of all available assistance resources, along with a what to expect sheet to help them navigate through the reporting process. Please see "Options for Assistance following a Sexual Misconduct Sheet" (Appendix: A).In the event that a sexual assault, and/or sex offense should occur on the school campus, the individual should report the event immediately to Tara Price, in the associate director's office or have a staff member contact her

outside of her normal office hours. She will immediately take steps to ensure the offense is reported to the local authorities, if requested by the student or employee.
The school does not have on campus counseling available for victims of sex offenses, so the employee and/or student should be provided (Appendix A- OPTIONS FOR ASSISTANCE FOLLOWING AN INCIDENT OF SEXUAL MISCONDUCT).

Any sexual offense occurring between students and/or employees or both will result in:
Discussing the options available for changing a victim's academic situation after the alleged sex offense, if changes are requested by the victim, and
The school will implement disciplinary actions in cases of an alleged sex offense after a disciplinary proceeding. Both the accuser and the accused will be entitled to the same opportunities to have the other present during a disciplinary proceeding and both will be informed of the school's final determination in any school disciplinary preceding with respect to the alleged sex offense and any sanction that is imposed against the accused simultaneously.
The result of the hearing will be final and will not be subject to an appeal process

Investigation of Complaints

In response to all complaints, the School promises prompt and equitable resolution through a reliable and impartial investigation of complaints, including the opportunity for both parties to present witnesses or other evidence. The time necessary to conduct an investigation will vary based on complexity but will generally be completed within sixty (60) days of receipt of the complaint. The School 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, the School 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.
The preponderance of the evidence standard will apply to investigations, meaning the School 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, the School will provide interim measures, as necessary, to protect the safety and wellbeing of students and/or employees involved.
If the School determines that unlawful harassment or sexual violence has occurred, immediate appropriate corrective action will be taken in accordance with the circumstances involved, and the School will take steps to prevent the recurrence of any harassment or discrimination. Any employee determined by the School 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 the School's disciplinary process. To the extent that an employee or contract worker is not satisfied with the school's handling of a harassment or discrimination complaint, he or she may also contact the appropriate state or federal enforcement agency for legal relief.

Retaliation Prohibited

The School will not retaliate against you 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 your supervisor, School Director or the Title IX Coordinator.

Reporting Requirements

Victims of sexual misconduct should be aware that School 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. The School 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. The School reserves the right to notify parents/guardians of dependent students regarding any health or safety risk, or a change in student status. This report will be revised and redistributed annually in the fall, by October 1st, to the campus community which includes all students and employees. This report will be made available to all prospective employees and students.

This warning will be made by a school official through the use of the school's public address system. The school does not have any procedure in place for voluntarily and confidentially reporting of crimes. The school does not have any pastoral or professional counselors employed at the school. All crimes reported to the school will be referred to local law enforcement.
Schilling Douglas School of Hair Design encourages victims of sexual violence to talk to somebody about what happened so victims can get the support they need, and so the school can respond appropriately.
A victim may speak to one of the schools CSA's to report the crime, if the victim wants to maintain confidentiality, the school will be unable to conduct an investigation into the particular incident or pursue disciplinary action against the alleged perpetrator.
A victim who at first requests confidentiality may later decide to file a complaint with the school or report the incident to local law enforcement, and thus have the incident fully investigated.
These school does not employ counselors or advocates so any victim will be referred to seek outside resources of which they will be provided a list of places they can contact.
The following employees (or categories of employees) are the school's responsible employees:

- Instructors
- Student Services
- Assistant to the Director
- Director

Before a victim reveals any information to a responsible employee, the employee should ensure that the victim understands the employee's reporting obligations – and, if the victim wants to maintain confidentiality, direct the victim to confidential resources. If the victim wants to tell the responsible employee what happened but also maintain confidentiality, the employee should tell the victim that the School will consider the request, but cannot guarantee that the School will be able to honor it. In reporting the details of the incident to the Title IX Coordinator, the responsible employee will also inform the Coordinator of the victim's request for confidentiality. Responsible employees will not pressure a victim to request confidentiality, but will honor and support the victim's wishes, including for the School to fully investigate an incident. By the same token, responsible employees will not pressure a victim to make a full report if the victim is not ready to.

REQUESTING CONFIDENTIALITY FROM THE SCHOOL:

How the School Will Weigh the Request and Respond.
If a victim discloses an incident to a responsible employee but wishes to maintain confidentiality or requests that no investigation into a particular incident be conducted or disciplinary action taken, the School must weigh that request against the School's obligation to provide a safe, non-discriminatory environment for all students, including the victim. If the School honors the request for confidentiality, a victim must understand that the School's ability to meaningfully investigate the incident and pursue disciplinary action against the alleged perpetrator(s) may be limited. Although rare, there are times when the School may not be able to honor a victim's request in order to provide a safe, non-discriminatory environment for all students. The School has designated the following individual(s) to evaluate requests for confidentiality once a responsible employee is on notice of alleged sexual violence: **Assistant to the Director**, **Director**.
When weighing a victim's request for confidentiality or that no investigation or discipline be pursued, the Assistant to the Director, Director will consider a range of factors, including the following:
The increased risk that the alleged perpetrator will commit additional acts of sexual or other violence, such as:

- whether there have been other sexual violence complaints about the same alleged perpetrator;
- whether the alleged perpetrator has a history of arrests or records from a prior school indicating a history of violence;
- whether the alleged perpetrator threatened further sexual violence or other violence against the victim or others;

whether the sexual violence was committed by multiple perpetrators;
whether the sexual violence was perpetrated with a weapon;
whether the victim is a minor;
whether the School possesses other means to obtain relevant evidence of the sexual violence (e.g., security cameras or personnel, physical evidence);
whether the victim's report reveals a pattern of perpetration (e.g., via illicit use of drugs or alcohol) at a given location or by a particular group.
The presence of one or more of these factors could lead the School to investigate and, if appropriate, pursue disciplinary action. If none of these factors is present, the School will likely respect the victim's request for confidentiality. If the School determines that it cannot maintain a victim's confidentiality, the School will inform the victim prior to starting an investigation and will, to the extent possible, only share information with people responsible for handling the School's response. The School will remain ever mindful of the victim's well-being, and will take ongoing steps to protect the victim from retaliation or harm and work with the victim to create a safety plan. Retaliation against the victim, whether by students or School employees, will not be tolerated. The School will also:
assist the victim in accessing other available victim advocacy, academic support, counseling, disability, health or mental health services, and legal assistance both on and off campus (see portion of policy identifying these);
provide other security and support, which could include issuing a no-contact order, helping arrange a change of living or working arrangements or course schedules (including for the alleged perpetrator pending the outcome of an investigation) or adjustments for assignments or tests; and inform the victim of the right to report a crime to campus or local law enforcement – and provide the victim with assistance if the victim wishes to do so.
If, for example, the school has credible information that the alleged perpetrator has committed one or more prior rapes, the balance of factors would compel the school to investigate the allegation and, if appropriate, pursue disciplinary action. The school may not require a victim to participate in any investigation or disciplinary proceeding. Because the School is under a continuing obligation to address the issue of sexual violence campus-wide, reports of sexual violence (including non-identifying reports) will also prompt the School to consider broader remedial action – such as increased monitoring, supervision or security at locations where the reported sexual violence occurred; increasing education and prevention efforts, including to targeted population groups; conducting climate assessments/victimization surveys; and/or revisiting its policies and practices. If the School determines that it can respect a victim's request for confidentiality, the School will also take immediate action as necessary to protect and assist the victim.

Additional Information

Employees should contact the Associate Director for more information or any questions related to this policy. Students may contact the Title IX Coordinator with any questions related to this policy. In addition, the U.S. Department of Education Office for Civil Rights ("OCR") investigates complaints of unlawful harassment of students in educational programs or activities. This agency may serve as a neutral fact finder and will attempt to facilitate the voluntary resolution of disputes with the parties. For more information, visit the OCR website at: http://www.hhs.gov/ocr/.

SEX OFFENDER REGISTRATION IN DELAWARE

In accordance with Title 11, Chapter 41 of the Delaware Code, information regarding registered sex offenders is maintained by the Delaware State Police. The Delaware State Police have created the Sex Offender Central Registry, a searchable database that may be accessed via an internet website. This database located at www.state.de.us/dsp/sexoff/ may be used to locate registered sex offenders by name, address, city, county, or zip code. Convicted sex offenders from out of state must register with the Delaware State Police within 7 business days of establishing permanent or temporary residency within the State of Delaware and all registrants must indicate where they intend to reside, be employed and/or study. A list of registered offenders who have identified Schilling Douglas School of Hair Design as their place of employment, or study can be found at the above listed website.

DEFINITIONS

Sexual Harassment is defined as unwelcome conduct of a sexual nature. It includes unwelcome sexual advances, requests for sexual favors, and other verbal, nonverbal, or physical conduct of a sexual nature. Sexual harassment is conduct that explicitly or implicitly affects a person's employment or education or interferes with a person's work or educational performance or creates an environment such that a reasonable person would find the conduct intimidating, hostile or offensive.

Hostile environment sexual harassment occurs when verbal, non-verbal and/or physical conduct is:

- Sexual and/or based on sex, gender, gender identity or sexual orientation (actual or perceived).
- unwelcome, and
- Sufficiently severe and pervasive to interfere with a person's work/learning/program performance or to create a hostile, intimidating or offensive environment.

The determination is made on a case-by-case basis looking at the whole record, including the circumstances (such as the nature of the sexual advances) and the context in which the alleged incidents occurred. Some behaviors which may be acceptable in certain contexts are inappropriate in the workplace or classroom, particularly if an objection is expressed. Whether or not the behavior is contrary to law or school policy depends upon the circumstances of each case.

Sexual Violence is defined as physical sexual acts engaged in without the consent of the other person or when the other person is unable to consent to the activity. Sexual violence includes sexual assault, rape, battery, and sexual coercion; domestic violence; dating violence; and stalking.

Domestic Violence is defined as abuse committed against and adult or a minor who is a spouse or former spouse, cohabitant or former cohabitant, or someone with whom the abuser has a child, has an existing dating or engagement relationship, or has had a former dating or engagement relationship. Delaware law defines "domestic violence" as the occurrence of one or more of the following acts of "abuse" between family or household members:

- causing or attempting to cause actual physical injury or sexual offenses
- placing or attempting to place a person in fear of physical injury or sexual offense
- damaging, destroying, or taking property
- trespassing
- child abuse
- kidnapping
- unlawful imprisonment
- interference with custody
- causing fear or emotional distress
- any other conduct that a reasonable person would find threatening or harmful

Domestic Violence can be defined per federal guidelines by:

- 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.

This can be a misdemeanor or a felony charge depending on the severity of the crime committed.

Dating Violence is defined as abuse committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. Dating violence is controlling, abusive, and aggressive behavior in a romantic relationship. It can happen in straight or gay relationships. It can include verbal, emotional, physical, or sexual abuse, or a combination. 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 party's statement and with consideration of 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.

- Any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

Call the National Domestic Violence Hotline at 1-800-799-7233 for help.

Sexual Assault occurs when a physical sexual activity is engaged in without the consent of the other person or when the other person is unable to consent to the activity. The activity or conduct may include physical force, violence, threat, or intimidation, ignoring the objections of the other person, causing the other person's intoxication or incapacitation through the use of drugs or alcohol, and taking advantage of the other person's incapacitation (including voluntary intoxication).
Sexual Offenses: any sexual act direct against another person, without the consent of the victim, including instances where the victim is incapable of giving consent.

- **Rape**-The penetration, no matter how slight of the vagina or anus with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.
- **Fondling**- the touching of private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because his or her age or because of his/her temporary or permanent mental incapacity.
- **Incest**- Sexual intercourse between two persons who are related to each other within degrees wherein marriage is prohibited by law.
- **Statutory Rape**- Sexual intercourse with a person who is under the statutory age of consent.

Stalking is behavior in which a person repeatedly engages in conduct directed at a specific person that places that person in reasonable fear of his or her safety or the safety of others.
While legal definitions of stalking vary from one jurisdiction to another, a good working definition of stalking is a course of conduct directed at a specific person that would cause a reasonable person to feel fear. 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.

For the purposes of this definition:

- Course of conduct means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property.
- Reasonable person means a reasonable person under similar circumstances and with similar identities to the victim.
- Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.
- Any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

Please refer to the following website for help regarding stalking.
http://www.victimsofcrime.org/our-programs/stalking-resource-center/help-for-victims

Consent is informed, voluntary and revocable. Consent is an affirmative, unambiguous, and conscious decision by each participant to engage in mutually agreed-upon sexual activity. It must be given without coercion, force, threats or intimidation. Consent must be ongoing throughout a sexual encounter and can be revoked at any time. Once consent it withdrawn, the sexual activity must stop immediately.
Communicating consent: Consent to sexual activity can be communicated in a variety of ways, but one should presume that consent has not been given in the absence of clear, positive agreement. While verbal consent is not an absolute requirement for consensual sexual activity, verbal communication prior to engaging in sex helps to clarify consent. Communicating verbally before engaging in sexual activity is imperative. However potentially awkward it may seem, talking about your own and your partner's sexual desires, needs, and limitations provide a basis for a positive experience. Consent must be clear and unambiguous for each participant at every stage of a sexual encounter. The absence of "no" should not be understood to mean there is consent. A prior relationship does not indicate consent to future activity.

Alcohol and Drugs:

A person who is asleep or mentally or physically incapacitated, either through the effect of drugs or alcohol or for any other reason, is not capable of giving valid consent. The use of alcohol or drugs may seriously interfere with the participants' judgment about whether consent has been sought and given.

Sexual Exploitation- "A person who induces another person to undertake or endure a sexual act by serious abuse of that person's position of dependency on the perpetrator, shall be guilty of sexual exploitation."

Retaliation is the action of harming someone because they have harmed oneself; revenge.

Intimidation is intentional behavior that "would cause a person of ordinary sensibilities" fear of injury or harm. It is not necessary to prove that the behavior was so violent as to cause terror or that the victim was actually frightened.

INVESTIGATION AND DISCIPLINARY ACTIONS

The School will, upon written request, disclose to the alleged victim/perpetrator of any crime of violence, or a non-forcible sex offense, the report on the results of any disciplinary proceeding conducted by such institution against a student who is the alleged perpetrator of such crime or offense with respect to such crime or offense. They will both be notified simultaneously. If the alleged victim of such crime or offense is deceased as a result of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of this paragraph. Upon receipt of a complaint regarding a Clery Crime the school will follow the Disciplinary Policy and Procedure for Violations of VAWA/Clery Crimes.

DISCIPLINE POLICY AND PROCEDURE FOR VIOLATIONS OF VAWA/CLERY CRIMES

Purpose- Our discipline policy and procedure for violations of VAWA/Clery crimes is designed to provide a structured corrective action process to improve and prevent a recurrence of undesirable behavior and/or conduct issues. It has been designed consistent with our organizational mission.

Outlined below are the steps of our discipline policy and procedure for violations of VAWA/Clery crimes. Schilling-Douglas School of Hair Design reserves the right to combine or skip steps depending upon facts of each situation and the nature of the offense. The level of disciplinary intervention may also vary. Some of the factors that will be considered depend upon whether the offense is repeated despite coaching and counseling.

This institute only has one type of proceeding, which is fact finding investigation with both parties individually, this will be used for any VAWA/Clery Violation Investigation.

Procedure-

Step 1: An Investigation will be started (Written Notification Given)-Step 1 creates an opportunity for an investigation to begin into the allegation of any VAWA/Clery crimes, both parties involved will receive written notification indicating that an investigation has begun and that they will be interviewed for fact finding. The parties involved will both be informed once a final decision has been made. Any accommodations that are determined to be necessary will be discussed in person with the party in which it directly impacts. The students/employees will be asked to sign this document. The student/employee's signature is needed to demonstrate the student/employee's understanding of the issues and corrective action needed. (This process will begin within 7-10 business days of receiving complaint.)

Step 2: Fact Finding Interviews- During step 2, the Title IV Coordinator will perform a fact-finding investigation. Outside parties may be called upon for help in regards to the investigation. Instructors/supervisors may also be asked to participate in the investigation process to meet with the students/employees and review any additional information gathered to make an informed decision on the possibility that the incident(s) is likely to have occurred. The victim and the perpetrator will both be submitted to a line of question to fact find, they will both be given the

opportunity to have and advisor or council present during the questioning. Information about the conduct issues as well as any prior relevant corrective action plans will be taken into consideration as well. This process will be handled in as timely of a fashion as possible to allow adequate time for the investigation to take place. During the process it is very likely that witnesses and possible character witness's will be subject to questioning. Upon completion of the investigation the Title IV coordinator will outline the consequences for the students/employees of his or her failure to meet conduct expectations. This notification will include discipline actions deemed necessary up to and including termination if immediate and sustained corrective action is not taken may also be included in the written warning. (This process could take up to 2 months to be fully investigated.)

Step 3: Result- Final Determination (Final Notification will be given)-During step 3, the Title IV coordinator will give written notification of the findings and results of the investigation the outline will include the consequences for the student/employee of his or her failure to meet conduct expectations. A warning outlining that the student/employee may be subject to additional discipline up to and including termination if immediate and sustained corrective action is not taken may also be included. (This notification will be completed with 7-10 business days of final decision being made.)

Appeal Process- Students/Employees will not be given an opportunity to present information that may challenge information the Title IV Coordinator has used to issue the final disciplinary action. The purpose of the investigation process is to provide insight into extenuating circumstances that may have contributed to the student/employees conduct issues while allowing for an equitable solution. As an investigation into the fact findings is done in as thorough a manner as possible for our institution, we do not accept appeals.

Possible Sanctions (students)

1. ***Sent Home for the remainder of the day***
2. ***Verbal Warning (without suspension)***
3. ***Written Warning (without Suspension)***
4. ***Written Warning (with 1 day suspension)***
5. ***No contact order***
6. ***Written Warning with suspension from school (3, 7, 15, or 30 days)***
7. ***Change of classroom***
8. ***Suspension from school during the time of the investigation***
9. ***Suspension from school for an extended period of time to prevent contact (Up to 1 full semester).***
10. ***Leave of Absence may be given to the perpetrator until the victim graduates to eliminate contact between the two parties involved (Must comply with LOA Policy).***
11. ***Class schedule of perpetrator being changed from either full time to part time or part time to full time to accommodate the no contact ruling.***
12. ***Signing a no contact contract with school officials with rules for no contact between the two parties, if such rules are broken this will result in further disciplinary action.***
13. ***Termination from school with option for re-enrollment after victim graduates.***
14. ***Termination with no possibility of re-enrollment.***

Possible Sanctions (employees)

1. ***Sent Home for the remainder of the day (without pay)***
2. ***Verbal warning (without suspension)***
3. ***Written Warning (without Suspension)***
4. ***Written Warning (with 1 day suspension without pay)***
5. ***No contact order***
6. ***Written Warning with suspension from school (3, 7, 15, or 30 days without pay)***
7. ***Change of classroom***
8. ***Suspension from work (without pay) during the time of the investigation***

9. ***Suspension from work (without pay) for an extended period of time to prevent contact (Up to 1 full semester).***
10. ***Work schedule of perpetrator being changed from either full time to part time or part time to full time to accommodate the no contact ruling.***
11. ***Signing a no contact contract with school officials with rules for no contact between the two parties, if such rules are broken this will result in further disciplinary action.***
12. ***Termination from employment with option for re-hire after victim graduates.***
13. ***Termination with no possibility of re-hire.***

The last and most serious step in the progressive discipline procedure is termination. Generally, Schilling-Douglas School of Hair Design will try to exercise a progressive nature of this policy by first providing warnings, written warnings with suspension and final written warnings with suspension from the school before proceeding to terminate. However, Schilling-Douglas School of Hair Design reserves the right to combine and skip steps depending upon the circumstances of each situation and the nature of the offense. Furthermore, students/employees may be terminated without prior notice or disciplinary action.

Performance and Conduct Issues Not Subject to Progressive Discipline-Behavior that is illegal is not subject to progressive discipline and may be reported to local law enforcement. Theft, intoxication at school, fighting and other acts of violence are also not subject to progressive discipline and may be grounds for immediate termination.

Documentation- The student/employee will be provided copies of all progressive discipline documentation, including all performance improvement plans. The student/employee will be asked to sign copies of this documentation attesting to their receipt and understanding of the corrective action outlined in these documents. Refusal to sign does not constitute dismissal of the disciplinary action. Copies of these documents will be placed in the student/employee's official permanent file.

APPENDIX A: OPTIONS FOR ASSISTANCE FOLLOWING AN INCIDENT OF SEXUAL MISCONDUCT

If you or someone you know is/or has been a victim of sexual assault, there are people that can help. You are not alone. The following is a list of things you may want to do:

Go to a safe place.

If you want to report the crime, notify the police immediately. Reporting the crime can help you regain a sense of personal power and control.

Call a friend, a family member, or someone else you trust who can be with you and give you support.

Preserve all physical evidence of the assault.

Do not shower, bathe, douche, eat, drink, wash your hands, or brush your teeth until after you have had a medical examination.

Save all of the clothing you were wearing at the time of the assault. Place each item of clothing in a separate paper bag. Do not use plastic bags.

Do not clean or disturb anything in the area where the assault occurred.

Get medical care as soon as possible.

Go to a hospital emergency department or a specialized forensic clinic that provides treatment for sexual assault victims. Even if you think that you do not have any physical injuries, you should still have a medical examination and discuss with a health care provider the risk of exposure to sexually transmitted infections and the possibility of pregnancy resulting from the sexual assault. Having a medical exam is also a way for you to preserve physical evidence of a sexual assault.

If you suspect that you may have been given a "rape drug," ask the hospital or clinic where you receive medical care to take a urine sample. Drugs, such as Rohypnol and GHB, are more likely to be detected in urine than in blood.

Write down as much as you can remember about the circumstances of the assault, including a description of the assailant.

Get information whenever you have questions or concerns. After a sexual assault, you have a lot of choices and decisions to make - e.g., about getting medical care, making a police report, and telling other people.

You may have concerns about the impact of the assault and the reactions of friends and family members. You can get information by calling a rape crisis center, a hotline, or other victim assistance agencies.

CHRISTIANA CARE- Newark, DE

4755 Ogletown-Stanton Road, Newark, DE 19718
1-302-733-1000

Christiana Care forensic nurse examiners treat more than 400 victims of sexual assault, and domestic violence every year. Nurse examiners at Christiana Care's emergency departments are part of the state of Delaware's multidisciplinary Sexual Assault Response Team, created to ensure that survivors of sexual assault do not become victims of a fragmented medical-legal system. They offer confidential services, evaluate each victim's pregnancy risk and help prevent sexually transmitted diseases and infections. These services are provided at no cost to the victim. Confidential services are provided whether or not the victim chooses to have police involvement.
Talk with a counselor who is trained to assist rape victims. Counseling can help you learn how to cope with the emotional and physical impacts of the assault. You can find a counselor by contacting a local rape crisis center, a hotline, a counseling service, and other victim assistance agencies.

National Programs Available

NATIONAL SEXUAL ASSAULT HOTLINE
1-800-656-4673
LOVE IS RESPECT
1-866-331-9774
NATIONAL DOMESTIC VIOLENCE HOTLINE
1-800-799-7233
Local Programs Available
CCDV RAPE CRISIS PROGRAM- Elkton, MD
Hotline: 1-410-996-0333
Phone: 1-410-996-0333
CONTACT LIFELINE INC- Wilmington, DE
Hotline: 1-800-262-9800
Hotline: 1-302-761-9100
Phone: 1-302-761-9100
THE CRIME VICTIMS CENTER OF CHESTER COUNTY INC- West Chester, PA
Hotline: 1-610-692-7232
Phone: 1-610-692-7232
SALEM COUNTY WOMENS SERVICES- Salem, NJ
Hotline: 1-888-632-9511
Phone: 1-856-935-6655

If you are a victim of sexual assault student services is available to make changes to your course schedule or to grant an academic leave of absence, or other protective measures that may be taken. They can also speak with you in regards to any financial aid that may be available, your living situations, transportation situation, and/or working situation.

APPENDIX B: STATEMENT OF VICTIMS RIGHTS

Victims have the right to choose counseling and medical treatment, and to prosecute and report their case through the off-campus court system. They also have the right to refuse all these options without reproach from any Schilling Douglas School of Hair Design personnel.
The victim will be given the choice in whether or not the incident is to be reported to the local authorities. If the victim chooses to notify law enforcement the victim has the option to have a school representative present to assist them in the reporting of the incident. The victim also has the right to decline reporting of the incident to the local authorities, in which case no further legal action can be taken by the school.
Victims have the right to be treated with dignity and seriousness by campus personnel.
Victims of crimes against an individual have the right to be reasonably free from intimidation and harm.
Personnel are encouraged to inform all victims that:

Victims are not responsible for crimes committed against them;

Victims are not negligent toward their own and thus do not assume the risk of crime; and

Victims should always report their crime, despite the possibility of adverse publicity for the School.

Victims will be made aware of appropriate student services, including hotlines available for counseling.

- Victims are entitled to the same support opportunities available to the accused in a campus disciplinary proceeding.
- If the accused is prohibited from contacting the victim or entering the victim's residence, the victim will be notified that the ban is in effect.
- Any victim who does not wish to remain in his/her present class may be granted a transfer to any available class.
- The victim has the right to information regarding the status of his/her case, including the results of any disciplinary proceedings.
- Both the accused and the victim are entitled to have an advisor/advocate present during the student disciplinary process.
- Both the accused and the victim are entitled to file an appeal if they feel the hearing was unfair or unjust.
- Both the accused and the victim shall be simultaneously informed in writing of the final decision.
- Victim's personal information will be kept confidential and not be made available to the general public.

APPENDIX C: PREVENTING SEXUAL ASSAULT

Sexual assault is a general term that includes any forced or unwanted sexual activity, including rape, incest, sexual abuse, and molestation. Sexual assault includes any forced or unwanted touching of an intimate part of the body, such as breasts, buttocks, or genitals.

What is consent? Sexual activity requires consent, which is defined as voluntary, positive agreement between the participants to engage in specific sexual activity.

Communicating consent:

Consent to sexual activity can be communicated in a variety of ways, but one should presume that consent has not been given in the absence of clear, positive agreement.

While verbal consent is not an absolute requirement for consensual sexual activity, verbal communication prior to engaging in sex helps to clarify consent. Communicating verbally before engaging in sexual activity is imperative. However potentially awkward it may seem, talking about your own and your partner's sexual desires, needs, and limitations provide a basis for a positive experience.

Consent must be clear and unambiguous for each participant at every stage of a sexual encounter. The absence of "no" should not be understood to mean there is consent.

A prior relationship does not indicate consent to future activity.

Alcohol and drugs:

A person who is asleep or mentally or physically incapacitated, either through the effect of drugs or alcohol or for any other reason, is not capable of giving valid consent.

The use of alcohol or drugs may seriously interfere with the participants' judgment about whether consent has been sought and given.

APPENDIX D: DOMESTIC VIOLENCE PREVENTION

Delaware law defines "domestic violence" as the occurrence of one or more of the following acts of "abuse" between family or household members:

- causing or attempting to cause actual physical injury or sexual offenses
- placing or attempting to place a person in fear of physical injury or sexual offense
- damaging, destroying, or taking property
- trespassing
- child abuse
- kidnapping
- unlawful imprisonment
- interference with custody
- causing fear or emotional distress
- any other conduct that a reasonable person would find threatening or harmful

Call the National Domestic Violence Hotline at 1-800-799-7233 for help.

APPENDIX E: DATING VIOLENCE PREVENTION

Healthy relationships allow both partners to feel supported and connected but still feel independent. **COMMUNICATION** and **BOUNDARIES** are the two major components of a healthy relationship. Ultimately, the two people in the relationship decide what is healthy for them and what is not. If something doesn't feel right, you should have the freedom to voice your concerns to your partner.

What Is It? Dating violence is controlling, abusive, and aggressive behavior in a romantic relationship. It can happen in straight or gay relationships. It can include verbal, emotional, physical, or sexual abuse, or a combination.

Anyone can be a victim of dating violence. Both boys and girls are victims, but boys and girls abuse their partners in different ways. Girls are more likely to yell, threaten to hurt themselves, pinch, slap, scratch, or kick. Boys injure girls more and are more likely to punch their partner and force them to participate in unwanted sexual activity. Some teen victims experience physical violence only occasionally; others, more often.

If You Are a Victim of Dating Violence, You Might…

- Think it's your fault.
- Feel angry, sad, lonely, depressed, or confused.
- Feel helpless to stop the abuse.
- Feel threatened or humiliated.
- Feel anxious.
- Not know what might happen next.
- Feel like you can't talk to family and friends.
- Be afraid of getting hurt more seriously.
- Feel protective of your boyfriend or girlfriend.

Get Help-Being a victim of dating violence is not your fault. Nothing you say, wear, or do gives anyone the right to hurt you.

- If you think you are in an abusive relationship, get help immediately. Don't keep your concerns to yourself.
- Talk to someone you trust like a parent, teacher, or student services personnel.
- If you choose to tell, you should know that some adults are mandated reporters. This means they are legally required to report neglect or abuse to someone else, such as the police or child protective services. You can ask people if they are mandated reporters and then decide what you want to do. Some examples of mandated

reporters are teachers, counselors, doctors, social workers, and in some cases, coaches or activity leaders. If you want help deciding whom to talk to, call a crisis line in your area. You might also want to talk to a trusted family member, a friend's parent, an adult neighbor or friend, an older sibling or cousin, or other experienced person who you trust. Call the National Domestic Violence Hotline at 1-800-799-7233 for help.

APPENDIX F: STALKING PREVENTION

What is stalking? While legal definitions of stalking vary from one jurisdiction to another, a good working definition of stalking is a course of conduct directed at a specific person that would cause a reasonable person to feel fear. Stalking is serious, often violent, and can escalate over time. Warning Signs:

- Follow you and show up wherever you are.
- Send unwanted gifts, letters, cards, or e-mails.
- Damage your home, car, or other property.
- Monitor your phone calls or computer use.
- Use technology, like hidden cameras or global positioning systems (GPS), to track where you go.
- Drive by or hang out at your home, school, or work.
- Threaten to hurt you, your family, friends, or pets.
- Find out about you by using public records or online search services, hiring investigators, going through your garbage, or contacting friends, family, neighbors, or co-workers.
- Posting information or spreading rumors about you on the Internet, in a public place, or by word of mouth.
- Other actions that control, track, or frighten you.

You are not to blame for a stalker's behavior. Please refer to the following website for help regarding stalking. http://www.victimsofcrime.org/our-programs/stalking-resource-center/help-for-victims

APPENDIX G: BYSTANDER INTERVENTIONS

If you know someone who might be in an abusive relationship, or a victim of any of the before mentioned crimes, you can help.

- Tell the person that you are worried. Be a good listener. Offer your friendship and support.
- Ask how you can help. Encourage your friend to seek help.
- Educate yourself about dating violence and healthy relationships.
- Avoid any confrontations with the abuser. This could be dangerous for you and your friend.
- Offer your support by going with the friend when they report the crime.
- Recognize situations of potential harm.
- Understanding institutional structures and cultural conditions that facilitate violence, overcoming barriers to intervening, identifying safe and effective intervention options, and taking actions to intervene.
- 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.

For the purposes of this definition:

- Course of conduct means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property.
- Reasonable person means a reasonable person under similar circumstances and with similar identities to the victim.
- Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.
- Any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

APPENDIX H: RISK REDUCTION TIPS

There are things all of us can do to be as safe as possible. Here are some suggested strategies to help to reduce vulnerability to sexual violence, whether it be sexual assault, relationship abuse, or stalking.

To reduce the risk of sexual assault....

- Respond assertively- Communicate any discomfort you feel with another person's behavior. Don't make excuses. Trust your instincts.

- Don't isolate with someone you just met- Always have a safe way to get home. Don't sleep over because you can't get home. Especially don't isolate with someone who tries to get too close, enjoys your discomfort or someone who doesn't listen or respond when you say "NO".

- Avoid drunk sex- Limit your alcohol consumption so that you can protect yourself, prevent aggressive behavior under the influence or help a friend who may need you.

- Believe in your right to set sexual limits for yourself- Learn how to communicate these limits and how to assert yourself by saying "NO" convincingly when you mean "NO" and "YES" when you mean "YES".

- Believe in another person's right to say "NO"- Be aware of the affect peer pressure has on your decision here. Remember it's okay not to have sex. Accept that "NO" means "NO".

- Date men/women who are your equal thinking you have more of a right to your desires can lead to date rape or dating abuse.
- Remember active consent is necessary every time you have sexual contact with someone. Don't assume previous permission for sexual contact applies to the current situation (especially when a person is asleep or drunk).
- Don't assume behavior is a signal for sex. Thinking someone wants sex is not the same as knowing for sure. Be sure. Communicate.

To reduce the risks and warning signs of abusive relationship:

Listen to yourself if you are sensing "bad vibes", especially if you are feeling down on yourself or find yourself afraid in a relationship. Trust your instincts.
Know that even one instance of physical, verbal or emotional violence is dating violence.
Cruelty or physical violence to other people, animals or you, even if it happens just once, is a sure sign that more abuse is to come.
Be alert to actions which reduce your personal independence and self-control, such as urging you to give up existing friendships or family connections, telling you either what to wear, or what to say or who to hang out with.
Be alert to signs of jealousy and/or possessiveness. These are signs of insecurity, not love.
Seek assistance from professionals who can help you learn more about abusive relationships and to explore options that are available to you.

To reduce the risks of stalking:

If you are in immediate danger, call 911.

- Do not ignore any threat. Report any instance of stalking to local Police, immediately. Trust your instincts.
- Keep evidence of any threat or instance of stalking. Keep a daily journal containing information on time, date and place of each instance, and keep it all in a safe and confidential place. Keep e-mails, phone messages, letters, and notes.
- Don't downplay a sense of danger by thinking "it will just go away". If you feel unsafe, you probably are. Stalking behavior typically does not just stop.

- Tell family, friends, roommates and co-workers about the stalking and seek their support.
- Limit the distribution of personal information, including home address and phone numbers, and be wary of any person who seeks to obtain too much personal information about you too quickly. Be careful about what you choose to post on public web services, such as "Facebook, Instagram". Fully shred all personal information before disposing of anything in the trash.
- Maintain quick access to critical telephone numbers and the location of safe places.
- Seek assistance from law enforcement and/or qualified professionals who can help you with safety strategies that are appropriate to your individual circumstance, including assistance with obtaining court issued orders of protection.

Drug and Alcohol Policies

The abuse of alcohol and the use of illegal drugs by members of the Schilling Douglas School of Hair Design community are incompatible with the goals of an academic institution. In order to ensure that alcohol and illegal drugs do not interfere with the goals of the school, substance abuse prevention programs have been developed that apply to the school as both an educational institution and a work place. All employees and students are required to take part in the school's drug and alcohol abuse prevention program presented upon hire and new student orientation. Should a student at any time need information regarding alcohol or drug abuse they are asked to please contact the school's business office. Employees and students may also contact The National Alcohol and Substance Abuse Treatment Information Center at 1(800)784-6776.
All Employees and students are prohibited from the unlawful manufacture, distribution, possession or use of illicit drugs or alcohol while on school property or during school trips. A student or staff member found to have violated this policy would be terminated from enrollment or employment and Federal, state or local authorities will be contacted to properly handle the event.
Please refer to our separate Drug Prevention Program for additional information.

Appendix I: Drug Prevention Program

The National Institute on Drug Abuse estimates that one in every five workers age 18-25 and one in every eight workers age 26-34 uses drugs on the job. While it is difficult to put a price tag on the cost to employers of the theft, low morale, impaired judgment, high absenteeism, and high turnover caused by substance abuse, employers are aware of these costs and are attempting to ascertain that a person is not a potential substance abuser before hiring them.

We at Schilling Douglas School of Hair Design, have made a commitment to our students to prepare them for a long and successful professional career. Schilling Douglas School of Hair Design, as a result of these responsibilities, has a compelling obligation to eliminate illegal drug use from the school. We intend to honor this obligation in the following manner:

1. Imposing an absolute prohibition on the unlawful distribution, dispensation, possession, or use of a controlled substance or alcohol by any student or employee of the school, on school property or as a part of any school activity.
2. Making available to all students and employees information concerning the health hazards involved with alcohol and drug abuse.
3. Making available to all students and employees information concerning the legal sanctions involved with the illegal use of drugs and alcohol.
4. Making available to all students and employees information concerning drug and alcohol counseling and rehabilitation services

The school in its policies supports and endorses the Federal Drug-Free Workplace Act of 1988 and the Drug-Free Schools and Communities Act Amendments of 1989. The unlawful manufacture, distribution, dispensation, possession or use of a controlled substance or abuse of alcohol by anyone on School property or as a part of any School activity is prohibited. Students taking prescribed or over-the-counter medication which may affect functioning should so inform Campus Security Authorities.

Facts about Drugs and Alcohol and their health risks....

Alcohol- Ethyl alcohol, or ethanol, is an intoxicating ingredient found in beer, wine, and liquor. Alcohol is produced by the fermentation of yeast, sugars, and starches. It is a central nervous system depressant that is rapidly absorbed from the stomach and small intestine into the bloodstream. A standard drink equals 0.6 ounces of pure ethanol, or 12 ounces of beer; 8 ounces of malt liquor; 5 ounces of wine; or 1.5 ounces (a "shot") of 80-proof distilled spirits or liquor (e.g., gin, rum, vodka, or whiskey). NIDA does not conduct research on alcohol; for more information, please visit the National Institute on Alcohol Abuse and Alcoholism (NIAAA), the Substance Abuse and Mental Health Services Administration, and the Centers for Disease Control (CDC).

Health Risks- Alcohol affects every organ in the drinker's body and can damage a developing fetus. Intoxication can impair brain function and motor skills; heavy use can increase risk of certain cancers, stroke, and liver disease. Alcoholism or alcohol dependence is a diagnosable disease characterized by a strong craving for alcohol, and/or continued use despite harm or personal injury. Alcohol abuse, which can lead to alcoholism, is a pattern of drinking that results in harm to one's health, interpersonal relationships, or ability to work.

Bath Salts- The term “bath salts” refers to an emerging family of drugs containing one or more synthetic chemicals related to cathinone, an amphetamine-like stimulant found naturally in the Khat plant.

Health Risks- Reports of severe intoxication and dangerous health effects associated with use of bath salts have made these drugs a serious and growing public health and safety issue. The synthetic cathinone in bath salts can produce euphoria and increased sociability and sex drive, but some users experience paranoia, agitation, and hallucinatory delirium; some even display psychotic and violent behavior, and deaths have been reported in several instances.

Club Drugs- Club drugs tend to be used by teenagers and young adults at bars, nightclubs, concerts, and parties. Club drugs include GHB, Rohypnol®, ketamine, and others. MDMA (Ecstasy), Methamphetamine, and LSD (Acid), are considered club drugs and are covered in their individual drug summaries.

Health Risks- Uncertainties about the sources, chemicals, and possible contaminants used to manufacture many club drugs make it extremely difficult to determine toxicity and associated medical consequences. Nonetheless, we do know that:

- Coma and seizures can occur following use of GHB. Combined use with other drugs such as alcohol can result in nausea and breathing difficulties. GHB and two of its precursors, gamma butyrolactone (GBL) and 1,4 butanediol (BD), have been involved in poisonings, overdoses, date rapes, and deaths.
- Rohypnol may be lethal when mixed with alcohol and/or other CNS depressants.
- Ketamine, in high doses, can cause impaired motor function, high blood pressure, and potentially fatal respiratory problems.

Cocaine- Cocaine is a powerfully addictive stimulant drug made from the leaves of the coca plant native to South America. It produces short-term euphoria, energy, and talkativeness in addition to potentially dangerous physical effects like raising heart rate and blood pressure.
Health Risks- Cocaine affects the body in a variety of ways. It constricts blood vessels, dilates pupils, and increases body temperature, heart rate, and blood pressure. It can also cause headaches and gastrointestinal complications such as abdominal pain and nausea. Because cocaine tends to decrease appetite, chronic users can become malnourished as well. Most seriously, people who use cocaine can suffer heart attacks or strokes, which may cause sudden death. Cocaine-related deaths are often a result of the heart stopping (cardiac arrest) followed by an arrest of breathing. People who use cocaine also put themselves at risk for contracting HIV, even if they do not share needles or other drug paraphernalia. This is because cocaine intoxication impairs judgment and can lead to risky sexual behavior. Some effects of cocaine depend on the method of taking it. Regular snorting of cocaine, for example, can lead to loss of the sense of smell, nosebleeds, problems with swallowing, hoarseness, and a chronically runny nose. Ingesting cocaine by the mouth can cause severe bowel gangrene as a result of reduced blood flow. Injecting

cocaine can bring about severe allergic reactions and increased risk for contracting HIV, hepatitis C, and other blood-borne diseases.
Binge-patterned cocaine use may lead to irritability, restlessness, and anxiety. Cocaine abusers can also experience severe paranoia—a temporary state of full-blown paranoid psychosis—in which they lose touch with reality and experience auditory hallucinations. Cocaine is more dangerous when combined with other drugs or alcohol (poly-drug use). For example, the combination of cocaine and heroin (known as a "speedball"), carries a particularly high risk of fatal overdose.

Hallucinogens- Hallucinogenic compounds found in some plants and mushrooms (or their extracts) have been used—mostly during religious rituals—for centuries. Almost all hallucinogens contain nitrogen and are classified as alkaloids. Many hallucinogens have chemical structures similar to those of natural neurotransmitters (e.g., acetylcholine-, serotonin-, or catecholamine-like). While the exact mechanisms by which hallucinogens exert their effects remain unclear, research suggests that these drugs work, at least partially, by temporarily interfering with neurotransmitter action or by binding to their receptor sites.

Health Risks- LSD, peyote, psilocybin, and PCP are drugs that cause hallucinations, which are profound distortions in a person's perception of reality. Under the influence of hallucinogens, people see images, hear sounds, and feel sensations that seem real but are not. Some hallucinogens also produce rapid, intense emotional swings. LSD, peyote, and psilocybin cause their effects by initially disrupting the interaction of nerve cells and the neurotransmitter serotonin.1 Distributed throughout the brain and spinal cord, the serotonin system is involved in the control of behavioral, perceptual, and regulatory systems, including mood, hunger, body temperature, sexual behavior, muscle control, and sensory perception. On the other hand, PCP acts mainly through a type of glutamate receptor in the brain that is important for the perception of pain, responses to the environment, and learning and memory.

There have been no properly controlled research studies on the specific effects of these drugs on the human brain, but smaller studies and several case reports have been published documenting some of the effects associated with the use of hallucinogens.

Heroin- Heroin is an opioid drug that is synthesized from morphine, a naturally occurring substance extracted from the seed pod of the Asian opium poppy plant. Heroin usually appears as a white or brown powder or as a black sticky substance, known as "black tar heroin."

Health Risks- Heroin abuse is associated with a number of serious health conditions, including fatal overdose, spontaneous abortion, and infectious diseases like hepatitis and HIV (see box, "Injection Drug Use and HIV and HCV Infection"). Chronic users may develop collapsed veins, infection of the heart lining and valves, abscesses, constipation and gastrointestinal cramping, and liver or kidney disease. Pulmonary complications, including various types of pneumonia, may result from the poor health of the user as well as from heroin's effects on breathing. Chronic use of heroin leads to physical dependence, a state in which the body has adapted to the presence of the drug. If a dependent user reduces or stops use of the drug abruptly, he or she may experience severe symptoms of withdrawal. These symptoms—which can begin as early as a few hours after the last drug administration—can include restlessness, muscle and bone pain, insomnia, diarrhea and vomiting, cold flashes with goose bumps ("cold turkey"), and kicking movements ("kicking the habit"). Users also experience severe craving for the drug during withdrawal, which can precipitate continued abuse and/or relapse. Besides the risk of spontaneous abortion, heroin abuse during pregnancy (together with related factors like poor nutrition and inadequate prenatal care) is also associated with low birth weight, an important risk factor for later delays in development. Additionally, if the mother is regularly abusing the drug, the infant may be born physically dependent on heroin and could suffer from neonatal abstinence syndrome (NAS), a drug withdrawal syndrome in infants that requires hospitalization. According to a recent study, treating opioid-addicted pregnant mothers with buprenorphine (a medication for opioid dependence) can reduce NAS symptoms in babies and shorten their hospital stays. In addition to the effects of the drug itself, street heroin often contains toxic contaminants or additives that can clog blood vessels leading to the

lungs, liver, kidneys, or brain, causing permanent damage to vital organs.

Inhalants- Many products readily found in the home or workplace—such as spray paints, markers, glues, and cleaning fluids—contain volatile substances that have psychoactive (mind-altering) properties when inhaled. People do not typically think of these products as drugs because they were never intended for that purpose. However, these products are sometimes abused in that way. They are especially (but not exclusively) abused by young children and adolescents, and are the only class of substance abused more by younger than by older teens.

Health Risks- Most abused inhalants other than nitrites depress the central nervous system in a manner not unlike alcohol. The effects are similar—including slurred speech, lack of coordination, euphoria, and dizziness. Inhalant abusers may also experience light-headedness, hallucinations, and delusions. With repeated inhalations, many users feel less inhibited and less in control. Some may feel drowsy for several hours and experience a lingering headache. Unlike other types of inhalants, nitrites enhance sexual pleasure by dilating and relaxing blood vessels. Although it is not very common, addiction to inhalants can occur with repeated abuse.

K2/Spice- "Spice" refers to a wide variety of herbal mixtures that produce experiences similar to marijuana (cannabis) and that are marketed as "safe," legal alternatives to that drug. Sold under many names, including K2, fake weed, Yucatan Fire, Skunk, Moon Rocks, and others — and labeled "not for human consumption" — these products contain dried, shredded plant material and chemical additives that are responsible for their psychoactive (mind-altering) effects.

Health Risks- Spice users report experiences similar to those produced by marijuana—elevated mood, relaxation, and altered perception—and in some cases the effects are even stronger than those of marijuana. Some users report psychotic effects like extreme anxiety, paranoia, and hallucinations. So far, there have been no scientific studies of Spice's effects on the human brain, but we do know that the cannabinoid compounds found in Spice products act on the same cell receptors as THC, the primary psychoactive component of marijuana. Some of the compounds found in Spice, however, bind more strongly to those receptors, which could lead to a much more powerful and unpredictable effect. Because the chemical composition of many products sold as Spice is unknown, it is likely that some varieties also contain substances that could cause dramatically different effects than the user might expect.

Marijuana- Marijuana is a dry, shredded green and brown mix of leaves, flowers, stems, and seeds from the hemp plant *Cannabis sativa*. In a more concentrated, resinous form, it is called hashish, and as a sticky black liquid, hash oil. The main psychoactive (mind-altering) chemical in marijuana is delta-9-tetrahydrocannabinol, or THC.

Health Risks- Marijuana use may have a wide range of effects, particularly on cardiopulmonary and mental health. Marijuana smoke is an irritant to the lungs, and frequent marijuana smokers can have many of the same respiratory problems experienced by tobacco smokers, such as daily cough and phlegm production, more frequent acute chest illness, and a heightened risk of lung infections. One study found that people who smoke marijuana frequently but do not smoke tobacco have more health problems and miss more days of work than those who don't smoke marijuana, mainly because of respiratory illnesses. It is not yet known whether marijuana smoking contributes to risk for lung cancer.

MDMA (Ecstasy/Molly)- MDMA (3,4-methylenedioxy-methamphetamine), popularly known as ecstasy or, more recently, as Molly, is a synthetic, psychoactive drug that has similarities to both the stimulant amphetamine and the hallucinogen mescaline. It produces feelings of increased energy, euphoria, emotional warmth and empathy toward others, and distortions in sensory and time perception.

Health Risks- MDMA can have many of the same physical effects as other stimulants like cocaine and amphetamines. These include increases in heart rate and blood pressure, which are particularly risky for people with circulatory problems or heart disease. MDMA users may experience other symptoms such as muscle tension, involuntary teeth clenching, nausea, blurred vision, faintness, and chills or sweating. In high doses, MDMA can

interfere with the body's ability to regulate temperature. On rare but unpredictable occasions, this can lead to a sharp increase in body temperature (hyperthermia), which can result in liver, kidney, or cardiovascular system failure or even death. MDMA can interfere with its own metabolism (breakdown within the body), causing potentially harmful levels to build up in the body if it is taken repeatedly within short periods of time. Compounding the risks is the fact that ecstasy tablets and even capsules of supposedly pure "Molly" sometimes actually contain other drugs instead or in addition. Those may include ephedrine (a stimulant), dextromethorphan (a cough suppressant), ketamine, caffeine, cocaine, methamphetamine, or even, most recently, synthetic cathinones (the psychoactive ingredients in "bath salts"). These substances are harmful alone and may be particularly dangerous mixed with MDMA. Users who intentionally or unknowingly combine such a mixture with additional substances such as marijuana and alcohol may be putting themselves at even higher risk for adverse health effects. Additionally, the closeness-promoting effects of MDMA and its use in sexually charged contexts (and especially in combination with sildenafil) may encourage unsafe sex, which is a risk factor for contracting or spreading HIV and hepatitis.

Methamphetamine- Methamphetamine is a central nervous system stimulant drug that is similar in structure to amphetamine. Due to its high potential for abuse, methamphetamine is classified as a Schedule II drug and is available only through a prescription that cannot be refilled. Although methamphetamine can be prescribed by a doctor, its medical uses are limited, and the doses that are prescribed are much lower than those typically abused. Most of the methamphetamine abused in this country comes from foreign or domestic superlabs, although it can also be made in small, illegal laboratories, where its production endangers the people in the labs, neighbors, and the environment.

Health Risks- Taking even small amounts of methamphetamine can result in many of the same physical effects as those of other stimulants, such as cocaine or amphetamines. These include increased wakefulness, increased physical activity, decreased appetite, increased respiration, rapid heart rate, irregular heart-beat, increased blood pressure, and increased body temperature. Long-term methamphetamine use has many negative consequences for physical health, including extreme weight loss, severe dental problems ("meth mouth"), and skin sores caused by scratching. Methamphetamine use also raises the risk of contracting infectious diseases like HIV and hepatitis B and C. These can be contracted both by sharing contaminated drug injection equipment and through unsafe sex. Regardless of how it is taken, methamphetamine alters judgment and inhibition and can lead people to engage in these and other types of risky behavior. Methamphetamine use may also worsen the progression of HIV/AIDS and its consequences. Studies indicate that HIV causes more injury to neurons and greater cognitive impairment in individuals who are HIV-positive and use methamphetamine than it does in HIV-positive people who do not use the drug.

Prescription Drugs and Cold Medicine- Some medications have psychoactive (mind-altering) properties and, because of that, are sometimes abused—that is, taken for reasons or in ways or amounts not intended by a doctor, or taken by someone other than the person for whom they are prescribed. In fact, prescription and over-the-counter (OTC) drugs are, after marijuana (and alcohol), the most commonly abused substances by Americans 14 and older.

Health Risks- Taken as intended, prescription and OTC drugs safely treat specific mental or physical symptoms. But when taken in different quantities or when such symptoms aren't present, they may affect the brain in ways very similar to illicit drugs. For example, stimulants such as Ritalin achieve their effects by acting on the same neurotransmitter systems as cocaine. Opioid pain relievers such as OxyContin attach to the same cell receptors targeted by illegal opioids like heroin. Prescription depressants produce sedating or calming effects in the same manner as the club drugs GHB and rohypnol. And when taken in very high doses, dextromethorphan acts on the same cell receptors as PCP or ketamine, producing similar out-of-body experiences. When abused, all of these classes of drugs directly or indirectly cause a pleasurable increase in the amount of dopamine in the brain's reward pathway. Repeatedly seeking to experience that feeling can lead to addiction.

Salvia- Salvia (*Salvia divinorum*) is an herb in the mint family native to southern Mexico. It is used to produce hallucinogenic experiences.

Health Risks- The main active ingredient in salvia, salvinorin A, is a potent activator of nerve cell targets called kappa opioid receptors. (These receptors differ from the receptors activated by commonly known opioid drugs such as heroin and morphine.) Although salvia is generally considered a hallucinogen, it does not act at serotonin receptors that are activated by other hallucinogens like LSD or psilocybin, and its effects are reported by experienced users to be different from those drugs. Subjective effects of salvia use have been described as intense but short-lived, appearing in less than 1 minute and lasting less than 30 minutes. They include psychedelic-like changes in visual perception, mood and body sensations, emotional swings, feelings of detachment, and a highly modified perception of external reality and the self, leading to a decreased ability to interact with one's surroundings. This last effect has prompted concern about the dangers of driving under the influence of salvinorin.

Steroids- "Anabolic steroids" is the familiar name for synthetic variants of the male sex hormone testosterone. The proper term for these compounds is *anabolic-androgenic steroids* (abbreviated AAS)—"anabolic" referring to muscle-building and "androgenic" referring to increased male sexual characteristics.

Health Risks- Anabolic steroids work very differently from other drugs of abuse, and they do not have the same acute effects on the brain. The most important difference is that steroids do not trigger rapid increases in the neurotransmitter dopamine, which is responsible for the rewarding "high" that drives the abuse of other substances. However, long-term steroid use can affect some of the same brain pathways and chemicals—including dopamine, serotonin, and opioid systems—that are affected by other drugs, and thereby may have a significant impact on mood and behavior. Abuse of anabolic steroids may lead to aggression and other psychiatric problems, for example. Although many users report feeling good about themselves while on steroids, extreme mood swings can also occur, including manic-like symptoms and anger ("roid rage") that may lead to violence. Researchers have also observed that users may suffer from paranoid jealousy, extreme irritability, delusions, and impaired judgment stemming from feelings of invincibility.

Tobacco/ Nicotine- Tobacco use is the leading preventable cause of disease, disability, and death in the United States. According to the Centers for Disease Control and Prevention (CDC), cigarette smoking results in more than 480,000 premature deaths in the United States each year—about 1 in every 5 U.S. deaths[1]—and an additional 16 million people suffer with a serious illness caused by smoking.[1] In fact,, for every one person who dies from smoking, about 30 more suffer from at least one serious tobacco-related illness.

Health Risks- Cigarettes and other forms of tobacco—including cigars, pipe tobacco, snuff, and chewing tobacco—contain the addictive drug nicotine. Nicotine is readily absorbed into the bloodstream when a tobacco product is chewed, inhaled, or smoked. A typical smoker will take 10 puffs on a cigarette over the period of about 5 minutes that the cigarette is lit. Thus, a person who smokes about 1 pack (25 cigarettes) daily gets 250 "hits" of nicotine each day. Upon entering the bloodstream, nicotine immediately stimulates the adrenal glands to release the hormone epinephrine (adrenaline). Epinephrine stimulates the central nervous system and increases blood pressure, respiration, and heart rate. Similar to other addictive drugs like cocaine and heroin, nicotine increases levels of the neurotransmitter dopamine, which affects the brain pathways that control reward and pleasure. For many tobacco users, long-term brain changes induced by continued nicotine exposure result in addiction—a condition of compulsive drug seeking and use, even in the face of negative consequences. Studies suggest that additional compounds in tobacco smoke, such as acetaldehyde, may enhance nicotine's effects on the brain.3 When an addicted user tries to quit, he or she experiences withdrawal symptoms including irritability, attention difficulties, sleep disturbances, increased appetite, and powerful cravings for tobacco. Treatments can help smokers manage these symptoms and improve the likelihood of successfully quitting. Cigarette smoking accounts for about one-third of all cancers, including 90 percent of lung cancer cases. Smokeless tobacco (such as chewing tobacco and snuff) also increases the risk of cancer, especially oral cancers. In addition to cancer, smoking causes lung diseases such as chronic bronchitis and emphysema, and increases the risk of heart disease, including stroke, heart attack, vascular

disease, and aneurysm. Smoking has also been linked to leukemia, cataracts, and pneumonia.4-5 On average, adults who smoke die 10 years earlier than nonsmokers.1 Although nicotine is addictive and can be toxic if ingested in high doses, it does not cause cancer—other chemicals are responsible for most of the severe health consequences of tobacco use. Tobacco smoke is a complex mixture of chemicals such as carbon monoxide, tar, formaldehyde, cyanide, and ammonia—many of which are known carcinogens. Carbon monoxide increases the chance of cardiovascular diseases. Tar exposes the user to an increased risk of lung cancer, emphysema, and bronchial disorders. Pregnant women who smoke cigarettes run an increased risk of miscarriage, stillborn or premature infants, or infants with low birthweight.5 Maternal smoking may also be associated with learning and behavioral problems in children.

Smoking more than one pack of cigarettes per day during pregnancy nearly doubles the risk that the affected child will become addicted to tobacco if that child starts smoking.6 While we often think of medical consequences that result from direct use of tobacco products, passive or secondary smoke also increases the risk for many diseases. Secondhand smoke, also known as environmental tobacco smoke, consists of exhaled smoke and smoke given off by the burning end of tobacco products. Nonsmokers exposed to secondhand smoke at home or work increase their risk of developing heart disease by 25–30% and lung cancer by 20–30%.7 In addition; secondhand smoke causes health problems in both adults and children, such as coughing, overproduction of phlegm, reduced lung function and respiratory infections, including pneumonia and bronchitis. Each year about 150,000 – 300,000 children younger than 18 months old experience respiratory tract infections caused by secondhand smoke.7 Children exposed to secondhand smoke are at an increased risk of ear infections, severe asthma, respiratory infections and death. In fact, more than 100,000 babies have died in the past 50 years from sudden infant death syndrome (SIDS), and other health complications as a result of parental smoking.8 Children who grow up with parents who smoke are more likely to become smokers, thus placing themselves (and their future families) at risk for the same health problems as their parents when they become adults. Although quitting can be difficult, the health benefits of smoking cessation are immediate and substantial—including reduced risk for cancers, heart disease, and stroke. A 35-year-old man who quits smoking will, on average, increase his life expectancy by 5 years.9

ON-CAMPUS PROHIBITION OF DRUGS OR ALCOHOL

Employees- As a condition of employment, employees will notify the school of any criminal drug statue conviction for a violation occurring in the workplace no later than five days after such conviction. Within 30 days of the employee notification of the first such conviction, the school will either terminate the employee or request written documentation from the employee that he/she has entered a rehabilitation program. A second conviction will result in termination.

Students- The unlawful manufacture, distribution, dispensation, possession or use of a controlled substance or abuse of alcohol by anyone on school property or as a part of any school activity is prohibited. Students taking prescribed or over-the-counter medication which may affect functioning should so inform Campus Security Authorities.

If a final determination is made that any student of the School is found to be abusing alcohol or using, possessing, manufacturing or distributing controlled substances in violation of the law on school property or at school events, they shall be subject to, at a minimum, the referral to counseling and automatic and immediate suspension or dismissal from School. Schilling Douglas School of Hair Design. Imposed sanctions are additional to any legal actions taken by local, state or federal authorities.

Federal Penalties and Sanctions for Possession of a Controlled Substance

(From the Federal Register, Vol. 55, No. 159, August 16, 1990)

21 U.S.C. 844 1st conviction: Up to one year imprisonment and fined at least $1,000, or both. After 1 prior drug conviction: At least 15 days in prison, not to exceed 2 years, and fined at least $2,500. After 2 or more prior drug

convictions: At least 90 days in prison, not to exceed 3 years, and fined at least $5,000. Special sentencing provisions for possession of substance with a cocaine base: Mandatory 5 years in prison or more, not to exceed 20 years, and fined a minimum of $1,000, or both if:

(a) First conviction and the amount of crack possessed exceeds 5 grams.

(b) Second crack conviction and the amount of crack possessed exceeds 3 grams.

(c) Third or subsequent crack conviction and the amount of crack possessed exceeds 1 gram.

21 U.S.C. 853(a)(2) and 881(a)(7) Forfeiture of personal and real property used to possess or to facilitate possession of a controlled substance if that offense is punishable by more than one-year imprisonment.

21 U.S.C. 881(a)(4) Forfeiture of vehicles, boats, aircraft, or any other conveyance used to transport or conceal a controlled substance.

21 U.S.C. 862 Denial of Federal benefits, such as student loans, grants, contracts, and professional and commercial licenses, up to one year for first offense, up to five years for second and subsequent offenses.

16 U.S.C. 922(g) Ineligible to receive or purchase a firearm.

Delaware Penalties and Sanctions for Possession of a Controlled Substance

The sections of the Delaware Code dealing with drug laws are extensive. Delaware has adopted the Uniform Controlled Substances Act, 16 Delaware. Code 4701-4796. The following outline is an effort to provide a general summary of the law. Employees with specific questions about the law should seek legal advice from an attorney and not rely on the following summary for complete information. Illegal drugs are divided into five schedules (or categories) by the law:

1. Schedule I- Substances with a high potential for abuse and for which there is no accepted medical use for treatment in the United States. This schedule includes certain opiates, opium derivatives (including heroine), hallucinogenic substances (including Phencyclidine (PCP), Lysergic acid diethylamide (LSD), mescaline and psilocybin), and marijuana.

2. Schedule II- Substances with a high potential for abuse and for which there is a currently accepted medical use for treatment in the United States. This schedule includes certain opium and opiates, and derivatives; coca leaves and derivatives; certain central nervous system stimulants (including amphetamines, phenmetrazines and methamphetamines); and certain central nervous system depressants (including methaqualones).

3. Schedule III- any stimulant or depressant drug; certain barbiturates with short-term effects; and certain narcotic compounds and combinations, all having less potential for abuse than Schedule I and II.
4. Schedule IV- certain barbiturates and other central nervous system depressants having lower potential for abuse than Schedule III. This schedule now includes dextropropoxyphene (Darvon).

5. Schedule V- drug substances with a lower potential for abuse than Schedule IV. (These substances may contain narcotic drugs, but certain sufficient quantities of non-narcotic drugs with medicinal qualities must be present.)

Under Delaware law, drug offenses are divided into two basic categories: (l) illegal delivery (sale), possession with intent to deliver; manufacture; or intent to manufacture and (2) illegal possession, use or consumption. Penalties under the law are generally severe. Jail sentences may be imposed for most offenses, and the judge has discretion to impose a sentence within the range allowed by the law. For the illegal manufacture, delivery or possession with an intent to manufacture or deliver a controlled substance or counterfeit controlled substance classified in Schedule I or II that is a narcotic drug, one is guilty of a class C felony and shall be fined at least $5,000 but no more than $50,000

and shall serve at least 6 years imprisonment for a first conviction and at least 12 years imprisonment for a second and subsequent convictions. For the illegal manufacture, delivery or possession with intent to manufacture or deliver a controlled substance or counterfeit controlled substance classified in Schedule I-V that is not a narcotic drug, one is guilty of a class E felony and shall be fined at least $1,000 but no more than $10,000 and shall serve no more than 5 years imprisonment. Delaware classifies as a class A misdemeanor the illegal possession, use or consumption of a controlled substance or counterfeit controlled substance which is a narcotic drug. Delaware also classifies as a class B misdemeanor the illegal possession, use or consumption of any controlled substance or counterfeit substance classified in Schedule I-V that is not a narcotic drug.

Federal Trafficking Penalties for Schedules I, II, III, IV, and V (except Marijuana)

Schedule	Substance/Quantity	Penalty	Substance/Quantity	Penalty
II	Cocaine 500-4999 grams mixture	**First Offense:** Not less than 5 yrs. and not more than 40 yrs. If death or serious bodily injury, not less than 20 yrs. or more than life. Fine of not more than $5 million if an individual, $25 million if not an individual. **Second Offense:** Not less than 10 yrs. and not more than life. If death or serious bodily injury, life imprisonment. Fine of not more than $8 million if an individual, $50 million if not an individual.	Cocaine 5 kilograms or more mixture	**First Offense:** Not less than 10 yrs. and not more than life. If death or serious bodily injury, not less than 20 yrs. or more than life. Fine of not more than $10 million if an individual, $50 million if not an individual. **Second Offense:** Not less than 20 yrs, and not more than life. If death or serious bodily injury, life imprisonment. Fine of not more than $20 million if an individual, $75 million if not an individual. **2 or More Prior Offenses:** Life imprisonment. Fine of not more than $20 million if an individual, $75 million if not an individual.
II	Cocaine Base 28-279 grams mixture		Cocaine Base 280 grams or more mixture	
IV	Fentanyl 40-399 grams mixture		Fentanyl 400 grams or more mixture	
I	Fentanyl Analogue 10-99 grams mixture		Fentanyl Analogue 100 grams or more mixture	
I	Heroin 100-999 grams mixture		Heroin 1 kilogram or more mixture	
I	LSD 1-9 grams mixture		LSD 10 grams or more mixture	
II	Methamphetamine 5-49 grams pure or 50-499 grams mixture		Methamphetamine 50 grams or more pure or 500 grams or more mixture	
II	PCP 10-99 grams pure or 100-999 grams mixture		PCP 100 grams or more pure or 1 kilogram or more mixture	

Substance/Quantity	Penalty
Any Amount Of Other Schedule I & II Substances Any Drug Product Containing Gamma Hydroxybutyric Acid Flunitrazepam (Schedule IV) 1 Gram	**First Offense**: Not more that 20 yrs. If death or serious bodily injury, not less than 20 yrs. or more than Life. Fine $1 million if an individual, $5 million if not an individual. **Second Offense:** Not more than 30 yrs. If death or serious bodily injury, life imprisonment. Fine $2 million if an individual, $10 million if not an individual.
Any Amount Of Other Schedule III Drugs	**First Offense**: Not more than 10 yrs. If death or serious bodily injury, not more that 15 yrs. Fine not more than $500,000 if an individual, $2.5 million if not an individual. **Second Offense**: Not more than 20 yrs. If death or serious injury, not more than 30 yrs. Fine not more than $1 million if an individual, $5 million if not an individual.
Any Amount Of All Other Schedule IV Drugs (other than one gram or more of Flunitrazepam)	**First Offense**: Not more than 5 yrs. Fine not more than $250,000 if an individual, $1 million if not an individual. **Second Offense:** Not more than 10 yrs. Fine not more than $500,000 if an individual, $2 million if other than an individual.
Any Amount Of All Schedule V Drugs	**First Offense:** Not more than 1 yr. Fine not more than $100,000 if an individual, $250,000 if not an individual. **Second Offense**: Not more than 4 yrs. Fine not more than $200,000 if an individual, $500,000 if not an individual.

PREVENTION AND TREATMENT CENTERS

Delaware:

Chief Bureau of Alcoholism and Drug Abuse

1901 North Dupont Highway

New Castle, DE 19720

1(302)421-6101

Maryland: Director Alcohol and Drug Abuse Administration

201 W. Preston St.

Baltimore, MD 21201

1(301)225-6910

New Jersey: Director Division of Narcotic and Drug Abuse Control Department of Health

CN 362

Trenton, NJ 08625

1(609)292-5760

Pennsylvania: Deputy Secretary Drug and Alcohol Programs Department of Health

P.O. BOX 90

Harrisburg, PA 17108

1(717)787-9857

HOTLINES

AL-Anon-1-800-356-9996

American Council on Alcoholism Help Line 1-800-527-5344

National Institute on Drug Abuse Hotline 1- 800-662-HELP

Cocaine Hotline 1-800-COCAINE

National Council on Alcoholism 1-800-NCA-CALL

TITLE IX POLICY

09/09/2026

This Policy applies to Schilling-Douglas School of Hair Design's education program and activities, circumstances where the School has disciplinary authority, and to misconduct occurring within any building owned or controlled by a School-recognized student organization. This Policy may also apply to the effects of off-campus misconduct that limit or deny a person's access to the School's education program or activities.

The School reserves the right to make changes to this policy as necessary, and once those changes are posted online, they are in effect. If government laws or regulations change or court decisions alter the requirements in a way that impacts this policy, this policy will be construed to comply with the most recent government laws, regulations, or court holdings.

Inquiries about Title IX may be referred to the School's Title IX Coordinator, the U.S. Department of Education's Office for Civil Rights, or both. The School's Title IX Coordinator(s) are:
Gabriel Akinporoye (302)737-5100 Ext. 102 gabriel@schillingdoulas.edu
Victor David Director (302)737-5100 Ext. 101 victor@schillingdouglas.edu

The School's nondiscrimination policy and grievance procedures can be found on the Student Resources page of the school's website, https://schillingdouglas.edu/student-resources/.

To report information about conduct that may constitute sex discrimination or make a complaint of sex discrimination under Title IX, please refer to the School's Title IX Policy.

Title IX POLICY

I. Statement of Non-discrimination and Purpose

Schilling-Douglas School of Hair Design ("School") is committed to maintaining a learning environment that is free from sex discrimination. As required by Title IX of the Educational Amendments of 1972, the school does not engage in or tolerate discrimination on the basis of sex in its education programs and activities, including retaliation for asserting or otherwise participating in claims of sex discrimination. The school encourages any student or employee who thinks that he or she has been subjected to sex discrimination, including quid pro quo sexual harassment, hostile environment sexual harassment, sexual assault, domestic and dating violence, or stalking (collectively, "Sexual Harassment"), by another student, employee, campus visitor or contractor to immediately report the incident to any of the individuals or offices listed below.
The purpose of the Title IX Policy (the "Policy") is to define the conduct prohibited, describe the process for reporting violations of the Policy, outline the process used to investigate and adjudicate alleged violations of Policy, and identify some of the resources available to the school's students and employees who are involved in an incident that may violate this Policy.

II. Scope

The standards of conduct defined by this Policy apply to all students, employees, contractors and visitors.

The procedures for reporting, investigating, and adjudicating Policy violations apply to Sexual Harassment that occurs within the school's education programs and activities. This Policy does not apply to sexual harassment that occurs off-campus, in a private setting, and outside the scope of the school's education programs and activities.

If an individual accused of violating this Policy is no longer affiliated with the school when the report is received, the school may not conduct an investigation into the allegations, but reserves the right to document the report and address the allegations with the accused individual prior to that individual returning to the school as a student, employee, or visitor. A decision to not conduct a formal investigation into the allegations against an accused individual no longer affiliated with the school does not preclude the provision of supportive measures to the complainant or other affected individuals.

III. Title IX Coordinator

The Institutional Title IX Coordinator(s) is responsible for the oversight and implementation of this Policy. The contact information for this individual is listed below.

Institutional Title IX Coordinator

Gabriel Akinporoye, Student Services (302)737-5100 Ext. 102
Associate Director (302)737-5100 Ext. 111
Victor David, Director (302)737-5100 Ext. 101 victor@schillingdouglas.edu

In addition, all individuals are encouraged to report conduct that may also violate criminal law to both the school and to local law enforcement. These processes are not mutually exclusive.

IV. Definitions

"Coercion" means conduct, including intimidation and express or implied threats of emotional, educational, reputational, financial, or other harm that would place a reasonable person in fear of immediate or future harm and that is employed to persuade or compel someone to engage in unwelcome sexual contact.

"Complainant" means an individual who is reported to be or alleges that they were the victim of an offense that violates this Policy.

"Consent" means assent in fact, whether express or apparent, by all of the involved parties to engage in the same sexual activity at the same time. It is the responsibility of the initiator of any sexual activity to obtain their partner's consent. Assent does not constitute consent if obtained through "coercion" or from an individual whom the initiator knows or reasonably should know is "incapacitated." Factors for analyzing consent are described below.

"Employee" means an individual who receives compensation for work or services. For purposes of this Policy, faculty and staff are considered "employees." Volunteers and independent contractors are not considered "employees."

"Force" means the use of physical violence and/or imposing on someone physically to gain sexual access.

"Incapacitation" refers to the state where a person does not appreciate the nature or fact of sexual activity due to the effect of drugs or alcohol consumption, medical condition or disability, or due to a state of unconsciousness or sleep. Factors for analyzing incapacitation are described in section V below.

"Minor" means a person younger than seventeen (17) years of age.

"Preponderance of the Evidence" means that the greater weight of the evidence favors either the finding of a violation or the finding of a non-violation. This standard is based on the more convincing evidence and its probable truth or accuracy, and not on the amount of evidence presented.

"Respondent" means an individual who has been accused of an offense under this Policy or is reported to have violated this Policy.

"Sexual Harassment" means conduct on the basis of sex that constitutes Quid Pro Quo Sexual Harassment, Hostile Environment Sexual Harassment, Sexual Assault, Domestic Violence, Dating Violence, or Stalking.

"Quid Pro Quo Sexual Harassment" occurs when an employee of the school conditions the provision of aid, benefit, or service of the school on an individual's participation in unwelcome sexual contact.

"Hostile Environment Sexual Harassment" is unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person access to the school's education programs and activities. Factors for analyzing Hostile Environment Sexual Harassment are discussed in section V below.

"Sexual Assault" includes the sex offenses of Rape, Sodomy, Sexual Assault with an Object, Fondling, Incest, and Statutory Rape.

"Rape" is the carnal knowledge of a person, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental or physical incapacity. There is carnal knowledge if there is the slightest penetration of the sexual organ of the female (vagina) by the sexual organ of the male (penis). Attempted Rape is included.

"Sodomy" is oral or anal sexual intercourse with another person, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental or physical incapacity.

"Sexual Assault with an Object" is using an object or instrument to unlawfully penetrate, however slightly, the genital or anal opening of the body of another person, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental or physical incapacity. An "object" or "instrument" is anything used by the offender other than the offender's genitalia.

"Fondling" is the touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental or physical incapacity.

"Incest" is sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited.

"Statutory Rape" is sexual intercourse with a person who is under the statutory age of consent.

"Domestic Violence" means felony or misdemeanor crimes 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.

"Dating Violence" means violence committed by a person who is or has been in a romantic or intimate relationship with the victim. The existence of such a relationship will be determined based on a consideration of the following factors: (i) the length of the relationship, (ii) the type of relationship, and (iii) the frequency of interaction between the persons involved in the relationship.

"Stalking" means engaging in a course of conduct directed at a specific person that would cause a reasonable person to (i) fear for his or her safety or the safety of others; or (ii) suffer substantial emotional distress. Stalking as defined in this Policy includes "cyberstalking," a particular form of stalking in which a person uses electronic media, such as the internet, social networks, blogs, phones, texts, or other similar devices or forms of contact.

Course of Conduct means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, or communicates to or about a person threats, that a reasonable person would regard as threatening bodily injury or death of that person, their family members including someone with whom the person is dating or interferes with that person's property.

Reasonable Person means a person under similar circumstances and with similar identities to the person subjected to the stalking behavior would fear for their safety or the safety of others, or suffer substantial emotional distress.

Substantial Emotional Distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.

Stalking can involve behaviors including, but not limited to:

intentional and repeated uninvited presence of the alleged perpetrator at another's home, workplace, school, or any place which would cause a reasonable person to be alarmed

following an individual without a reasonable justification for being in a particular area or taking a particular route; lying in wait;

excess communications, including any attempt to unreasonably, intentionally, and repeatedly make contact with a person over their stated objections; or

threats to the individual or threats to the individual's family, friends, pets, or property.

"Retaliation" is intimidation, threats, coercion, or discrimination against any individual for the purpose of interfering with any right or privilege secured by Title IX and its implementing regulations or because an individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under this Policy. Retaliation is prohibited and is considered a stand-alone Policy violation without regard to any finding of responsibility for violation of this Policy.

"Formal Complaint" means a document filed by a Complainant or signed by the Title IX Coordinator alleging Sexual Harassment against a Respondent and requesting that the school investigate the allegation of Sexual Harassment in accordance with this Policy. At the time of filing a Formal Complaint, a Complainant must be participating in or attempting to participate in the school's education programs and activities. A "document filed by a Complainant" means a document or electronic submission (such as an email) that contains the Complainant's physical or electronic signature or otherwise indicates that the Complainant is the person filing the Complaint.

"Supportive Measures" are non-disciplinary, non-punitive individualized services offered, as appropriate, and reasonably available, and without fee or charge, that are designed to restore or preserve equal access to the school's Education Programs and Activities without unreasonably burdening another Party, including measures designed to protect the safety of all parties implicated by a report or the school's education environment, or to deter Sexual Harassment. Supportive measures may include: counseling, extensions of academic or other deadlines, program-related adjustments, modifications to class schedules, campus escort services, leaves of absence, and other similar measures. Supportive Measures may also include mutual restrictions on contact between the parties implicated by a report.

"Education Programs and Activities" refers to all the operations of the school, including, but not limited to, in-person and online educational instruction, employment, and extracurricular activities. The term applies to all activity that occurs on campus or on other property owned or occupied by the school. It also includes off-campus locations, events, or circumstances over which the school exercises substantial control over the Respondent and the context in which the Sexual Harassment occurs.

V. Understanding Hostile Environment Sexual Harassment

In determining whether a Hostile Environment exists, the school will consider the totality of circumstances, including factors such as the actual impact the conduct has had on the Complainant; the nature and severity of the conduct at issue; the frequency and duration of the conduct; the relationship between the parties (including accounting for whether one individual has power or authority over the other); the respective ages of the parties; the context in which the conduct occurred; and the number of persons affected. The school will evaluate the totality of circumstances from the perspective of a reasonable person in the Complainant's position. A person's adverse subjective reaction to conduct is not sufficient, in and of itself, to establish the existence of a hostile environment.

The school encourages members of the school Community to report any and all instances of Sexual Harassment, even if they are unsure whether the conduct rises to the level of a policy violation.

Sexual Harassment also includes gender-based harassment, which may include acts of verbal, nonverbal, or physical aggression, intimidation, or hostility based on gender or gender stereotyping, even if those acts do not involve conduct of a sexual nature. Further, making employment or educational decisions based on sexual favoritism or on the basis of gender is strictly prohibited.

Some specific examples of conduct that may constitute Sexual Harassment if unwelcome include, but are not limited to:
Unreasonable pressure for a dating, romantic, or intimate relationship or sexual contact;
Unwelcome kissing, hugging, or massaging;
Sexual innuendos, jokes, or humor;
Displaying sexual graffiti, pictures, videos, or posters;
Using sexually explicit profanity;
Asking about, or telling about, sexual fantasies, sexual preferences, or sexual activities;
E-mail and Internet use that violates this Policy;
Leering or staring at someone in a sexual way, such as staring at a person's breasts or groin;
Sending sexually explicit emails, text messages, or social media posts;
Commenting on a person's dress in a sexual manner;
Giving unwelcome personal gifts such as lingerie that suggest the desire for a romantic relationship; or
Insulting, demeaning, or degrading another person based on gender or gender stereotypes.

VI. Understanding Consent and Incapacitation
Consent
Consent exists when someone knowingly, voluntarily, and by word or action agrees to engage in mutually agreed upon sexual activity or contact. Consent is active and not passive. It is the responsibility of the initiator of any sexual activity to obtain their partner's consent. While consent may be expressed by words or actions, it is highly recommended that consent be expressed and obtained verbally. Silence should not be interpreted as consent.

In evaluating Consent, the school will consider the presence of any force, threat of force, or Coercion, whether the Complainant had the capacity to give Consent, and, whether the communication (through words and/or actions) between the parties would be interpreted by a reasonable person (under similar circumstances and with similar identities) as a willingness to engage in a particular sexual act. There are certain instances where an individual cannot give consent to participate in a sexual act. The following illustrate some of those instances:
The Respondent compels another to submit to or participate in a sexual act by the use or threat of physical force or violence against the other person.
The Respondent knows or reasonably should know that the other person is unconscious or physically unable to resist.
The Respondent knows or reasonably should know that the other person is, at the time of the sexual act, incapable of either appraising the nature of the act or of resisting it.
The other person has not consented to the sexual act and the Respondent knows or reasonably should know the other person is unaware that the sexual act is occurring.
The Respondent or another has intentionally impaired the other person's power to appraise or control the other person's conduct by administering any substance without the other person's knowledge.
The Respondent compels the other person to submit to or participate in a sexual act by threatening to use force or violence against any other person.
Consent to one act does not constitute consent to another act, and consent on a previous occasion does not constitute consent on a later occasion. Consent to an act with one person does not constitute consent to an act with any other person. The existence of a prior or current relationship does not constitute consent. Even in the context of a relationship, there must be mutual consent.
Consent can be withdrawn or modified at any time, and sexual contact must stop immediately once consent is withdrawn. Consent cannot be inferred from silence, passivity, or lack of resistance. Relying on nonverbal communication alone may result in a violation of this Policy.

An individual is unable to provide Consent to engage in sexual activity when the individual:
Is under age 17 and (1) is not a spouse of the Respondent or (2) is more than three years younger than the Respondent at the time of the offense;
Has a mental disorder or developmental or physical disability that renders her or him incapable of giving knowing Consent;
Is unconscious or physically unable to resist; or
Is Incapacitated from alcohol or other drugs, and this condition was known, or reasonably should have been known, by the Respondent.

Use of Drugs or Alcohol

The fact that a Respondent was under the influence of drugs or alcohol at the time of the Sexual Misconduct will not diminish the Respondent's responsibility to obtain consent if that individual is the one who initiates sexual activity, nor shall being under the influence of alcohol or drugs be construed as an invitation to or as implied consent for sexual advances.

Incapacitation

Incapacitation is a state where an individual cannot make an informed and rational decision to Consent to engage in sexual contact because the individual lacks conscious knowledge of the nature of the act (e.g., to understand the "who, what, where, when, why or how" of the sexual interaction) and/or is physically or mentally helpless. An individual is also considered Incapacitated, and therefore unable to give Consent, when asleep, unconscious, or otherwise unaware that sexual contact is occurring.

Incapacitation can only be found when the Respondent knew or should have known that the Complainant was Incapacitated when viewed from the position of a sober, reasonable person. One's own intoxication is not an excuse for failure to recognize another person's Incapacitation.

Incapacitation may result from the use of alcohol and/or other drugs; however, consumption of alcohol or other drugs, inebriation, or intoxication alone are insufficient to establish Incapacitation. Incapacitation is beyond mere drunkenness or intoxication. The impact of alcohol or drugs varies from person to person, and evaluating Incapacitation requires an assessment of how consumption of alcohol and/or drugs impacts an individual's:
Decision-making ability
Awareness of consequences
Ability to make informed judgments
Capacity to appreciate the nature of circumstances of the act.

Some common signs that someone may be incapacitated include slurred speech, confusion, shaky balance, stumbling or falling down, vomiting, and unconsciousness. The existence of any one of these factors may support a finding of incapacitation for the purposes of this Policy.

VII. Reporting Policy Violations

The school recognizes the right of a victim of Sexual Harassment to report the incident to appropriate authorities and to receive a prompt and equitable resolution of the report. The school strongly encourages community members who feel that they are victims of Sexual Harassment to report alleged incidents of Sex Discrimination following the reporting protocol below.

Where to Report:
Title IX Coordinator

Students, employees, faculty, campus visitors and contractors may directly report incidents of Sexual Misconduct (including sexual violence) to the Title IX coordinator listed above.

Law Enforcement

The school recognizes and supports the right of a victim of a crime to choose whether to report the crime to law enforcement, to be assisted by the institution in reporting the crime to law enforcement, or to decline to report the crime to law enforcement. In addition, it is important for a victim of sexual harassment, sexual assault, dating violence, or stalking to go to a hospital for treatment and preservation of evidence, if applicable, as soon as practicable after an incident. The school encourages anyone who believes they experienced or witnessed a crime to make a report to local law enforcement. For immediate law enforcement assistance, students may contact the Newark police at (302)366-7111 (non-emergency) or 911 (emergency).

Requests for Anonymity

Once a report has been shared with the Title IX Coordinator, a Complainant may request that their identity remain private, that no investigation occur, or that no disciplinary action be taken. However, the school must determine whether or not they are required to investigate an alleged incident, even against such a request, in order to protect the health and safety of the school community. As necessary, the school reserves the right to initiate a Formal Complaint without the active participation by the victim of alleged misconduct.

If the Title IX Coordinator elects to file a Formal Complaint, the school will inform the alleged victim of the incident of that decision. Even if the school determines not to investigate the alleged incident, the school may take additional steps

the school deems necessary to protect the health and safety of the school's community in relation to the alleged incident.

Filing of False Complaints
Any person who knowingly files a false complaint of sex discrimination including Sexual Misconduct, is subject to disciplinary action, up to and including dismissal from the school. A person who files a complaint in good faith will not be subject to discipline.

It is also a violation of this Policy for any person to knowingly make a materially false statement during the course of an investigation, adjudication, or appeal under this Policy. However, filing a complaint or providing information which a party or witness genuinely believes is accurate (i.e., in "good faith"), but which is ultimately dismissed due to insufficient evidence or found to be untrue, does not constitute intentional false reporting. Members of the school community are encouraged to seek assistance even if they are unsure that what they are experiencing is Sexual Harassment.

Retaliation
Students, faculty and staff members are prohibited from retaliating in any way against an individual who has brought a complaint of Sexual Harassment; or against any individual who has participated in an investigation of such complaints. Any person who knowingly and intentionally retaliates against an individual is subject to disciplinary action, up to and including dismissal or termination from the school. Complaints of retaliation should be reported immediately to the school's Title IX Coordinator. Any person who knowingly and intentionally retaliates against an individual is subject to disciplinary action, up to and including termination or dismissal from the school.

VIII. Preliminary Assessment of Report
Upon receipt of a report, the Title IX Coordinator will conduct a preliminary assessment to determine whether the conduct, as reported, constitutes or could constitute Sexual Harassment.

If the Title IX Coordinator determines that the conduct reported could not fall within the scope of this Policy, and/or could not constitute Sexual Harassment, even if investigated, the Title IX Coordinator will close the matter and may notify the reporting party if doing so is consistent with the Family Educational Rights and Privacy Act ("FERPA").

If the Title IX Coordinator determines that the conduct reported could fall within the scope of this Policy, and/or could constitute Sexual Harassment, if investigated, the Title IX Coordinator will proceed to contact the Complainant. As part of the preliminary assessment, the Title IX Coordinator may take investigative steps to determine the identity of the Complainant, if such identity is not apparent from the report.

Contacting the Complainant
If a report is not closed as a result of the preliminary assessment and the Complainant's identity is known, the Title IX Coordinator or their designee will promptly contact the Complainant to discuss the following:
the availability of Supportive Measures with or without filing a Formal Complaint;
the Complainant's wishes with respect to such Supportive Measures;
the process for filing and pursuing a Formal Complaint;
the importance of going to a hospital for treatment and preservation of evidence as soon as practicable after the incident, if applicable;
the right to report the incident to the institution and to receive a prompt and equitable resolution of the report;

the right of a victim of a crime to choose whether to report the crime to law enforcement, to be assisted by the institution in reporting the crime to law enforcement, or to decline to report the crime to law enforcement; and information about resources that are available on campus and in the community.

Supportive Measures
The Title IX Coordinator or his/her designee will coordinate all services for individuals impacted by Sex Discrimination. These services include but are not limited to issuing a no-contact order, confidential counseling, academic accommodations for students when possible, as well as referrals within the local community. Any individual affected by or accused of Sexual Harassment will have equal access to support and counseling services offered through the school. The School encourages any individual who has questions or concerns to seek support of school-identified resources. The Title IX Coordinator is available to provide information about the school's policy and procedure and to provide assistance. A list of resources is located at the end of this Policy.

Complainant: The Title IX Coordinator or their designee will offer and make available Supportive Measures to the Complainant upon receipt of a report of Sexual Harassment regardless of whether the Complainant elects to file a Formal Complaint.

Respondent: The Title IX Coordinator will notify the Respondent of the availability of Supportive Measures contemporaneously with the Respondent being notified of a Formal Complaint. Once a Formal Complaint has been initiated, the school will offer and make available Supportive Measures to the Respondent in the same manner in which it offers and makes them available to the Complainant. The school will also offer and make available Supportive Measures to the Respondent prior to the Respondent being notified of a Formal Complaint, if the Respondent requests such measures.

All Parties: The school will, to the greatest extent practicable, ensure that each Party or other person who reports an incident of Sexual Harassment is offered counseling provided by a counselor who does not provide counseling to any other person involved in the incident. In addition, all Parties are allowed to drop a course in which both Parties are enrolled without any academic penalty.

Confidentiality: The school will maintain the confidentiality of Supportive Measures provided to either a Complainant or Respondent, to the extent that maintaining such confidentiality does not impair the school's ability to provide the Supportive Measures in question.

IX. Formal Complaint
Filing a Formal Complaint
A Complainant may file a Formal Complaint with the Title IX Coordinator requesting that the school investigate and adjudicate a report of Sexual Harassment in accordance with this Policy. However, at the time the Complainant submits a Formal Complaint, the Complainant must be participating in, or attempting to participate in, one of the school's Education Programs. A Complainant may file a Formal Complaint with the Title IX Coordinator in person, by regular mail, or by email using the contact information specified in Section VI above. No person may submit a Formal Complaint on the Complainant's behalf.

In any case, including a case where a Complainant elects not to file a Formal Complaint, the Title IX Coordinator may file a Formal Complaint on behalf of the school if doing so is not clearly unreasonable. Such action will normally be taken in limited circumstances involving serious or repeated conduct or where the alleged perpetrator may pose a continuing threat to the school Community. Factors the Title IX Coordinator may consider include (but are not limited to):
the seriousness of the alleged incident, including (a) whether a weapon was involved in the incident, (b) whether multiple assailants were involved in the incident, and (c) whether the incident is poses a risk of recurrence;
whether the institution has received other reports of Sexual Harassment committed by the Respondent;
whether the alleged incident poses a risk of harm to others; and

any other factors the school determines relevant.
If the Complainant or the Title IX Coordinator files a Formal Complaint, then the school will commence an investigation and proceed to adjudicate the matter. If the school elects to proceed as a Complainant, the school will inform the alleged victim of the incident of that decision. In all cases where a Formal Complaint is filed, the Complainant will be treated as a Party, irrespective of the Party's level of participation.

Consolidation of Formal Complaints
The school may consolidate Formal Complaints as to allegations of Sexual Harassment against more than one Respondent, or by more than one Complainant against one or more Respondents, or by one Party against the other Party, where the allegations of Sexual Harassment arise out of the same facts or circumstances. Where the investigation and adjudication process involve more than one Complainant or more than one Respondent, references in this Policy to the singular "Party," "Complainant," or "Respondent" include the plural, as applicable.

Dismissal Prior to Commencement of Investigation
In a case where the Complainant files a Formal Complaint, the Title IX Coordinator will evaluate the Formal Complaint and must dismiss it if the Title IX Coordinator determines:
The conduct alleged in the Formal Complaint would not constitute Sexual Harassment, even if proved; or
The conduct alleged in the Formal Complaint falls outside the scope of this Policy (i.e., because the alleged conduct did not occur in the school's Education Programs and Activities).

In the event the Title IX Coordinator determines the Formal Complaint should be dismissed pursuant to this Section 4, the Title IX Coordinator will provide written notice of dismissal to the parties and advise them of their right to appeal. A dismissal pursuant to this Section is presumptively a final determination for purposes of this Policy, unless otherwise specified in writing by the Title IX Coordinator in the written notice of dismissal.

Notice of Formal Complaint
Within five days of the Title IX Coordinator receiving a Formal Complaint, the Title IX Coordinator will transmit a written notice to the Complainant and Respondent that includes:
A copy of or hyperlink to this Policy;
Sufficient details known at the time so that the Parties may prepare for an initial interview with the investigator, to include the identities of the parties involved in the incident (if known), the conduct allegedly constituting Sexual Harassment, and the date and location of the alleged incident (if known);
A statement that the Respondent is presumed not responsible for the alleged Sexual Harassment and that a determination of responsibility will not be made until the conclusion of the adjudication and any appeal;
Notifying the Complainant and Respondent of their right to be accompanied by an advisor of their choice;
Notifying the Complainant and Respondent of their right to inspect and review evidence;
Notifying the Complainant and Respondent of the school's prohibitions on retaliation and false statements; and
Information about resources that are available on campus and in the community.
Should the school elect, at any point, to investigate allegations that are materially beyond the scope of the initial written notice, the school will provide a supplemental written notice describing the additional allegations to be investigated.

Presumption of Non-Responsibility
From the time a report or Formal Complaint is made, a Respondent is presumed not responsible for the alleged misconduct until a determination regarding responsibility is made final.

Interim Removal
At any time after receiving a report of Sexual Harassment, the Title IX Coordinator may remove a student Respondent from the school's education programs and activities on a temporary basis if an individualized safety and risk analysis determines that an immediate threat to the physical health or safety of any student or other individual arising from the allegations of Sexual Harassment justifies removal. In the event the Title IX Coordinator imposes an interim removal, the Title IX Coordinator must offer to promptly meet with the Respondent provide the Respondent an opportunity to challenge the interim removal.
In the case of a Respondent who is a non-student employee (administrator, faculty, or staff), and in its discretion, the school may place the Respondent on administrative leave at any time after receiving a report of Sexual Harassment, including during the pendency of the investigation and adjudication process.
For all other Respondents, including independent contractors and guests, the school retains broad discretion to prohibit such persons from entering onto its campus and other properties at any time, and for any reason, whether after receiving a report of Sexual Harassment or otherwise.

X. Investigation
Commencement and Timing
After the written notice of Formal Complaint is transmitted to the Parties, an investigator selected by the Title IX Coordinator will undertake an investigation to gather evidence relevant to the alleged misconduct, including inculpatory and exculpatory evidence. The burden of gathering evidence sufficient to reach a determination in the adjudication lies with the school and not with the Parties. The investigation will culminate in a written investigation report that will be submitted to the adjudicator during the selected adjudication process. Although the length of each investigation may vary depending on the totality of the circumstances, the school strives to complete each investigation within 45 days of the transmittal of the written notice of Formal Complaint.

Equal Opportunity
During the investigation, the investigator will provide an equal opportunity for the Parties to be interviewed, to present witnesses (including fact and expert witnesses), and to present other inculpatory and exculpatory evidence. Notwithstanding the foregoing, the investigator retains discretion to limit the number of witness interviews the investigator conducts if the investigator finds that testimony would be unreasonably cumulative, if the witnesses are offered solely as character references and do not have information relevant to the allegations at issue, or if the witnesses are offered to render testimony that is categorically inadmissible, such as testimony concerning sexual history of the Complainant. The investigator will not restrict the ability of the parties to gather and present relevant evidence on their own.

The investigation is a Party's opportunity to evidence that the Party believes is relevant to resolution of the allegations in the Formal Complaint. A Party that is aware of and has a reasonable opportunity to present particular evidence and/or identify particular witnesses during the investigation, and elects not to, will be prohibited from introducing any such evidence during the adjudication absent a showing of unavailability, mistake, inadvertence, surprise, or excusable neglect.

Witnesses and Evidence
The Investigator will make reasonable attempts to contact and interview individuals who are identified as witnesses with information relevant to the allegations of misconduct. The Investigator may elect not to interview witnesses whose sole purpose is to provide character information or who are otherwise unlikely to have relevant information as determined in the sole discretion of the Investigator. The Investigator will make reasonable attempts to obtain other relevant evidence available from the parties, witnesses, or other school departments.

At the conclusion of the evidence-gathering phase of the investigation, but prior to the completion of the investigation report, the investigator will transmit to each Party and their advisor, in either electronic or hard copy form, all evidence obtained as part of the investigation that is directly related to the allegations raised in the Formal Complaint, including evidence the school may choose not to rely on at any hearing and inculpatory or exculpatory evidence whether obtained from a Party or some other source. The parties will have ten days in which to submit to the investigator a written response, which the investigator will consider prior to completing the investigation report. The parties and their advisors are permitted to review the evidence solely for the purposes of this grievance process and may not duplicate or disseminate the evidence to the public.

Investigation Report
After the period for the parties to provide any written response has expired, the investigator will complete a written investigation report that fairly summarizes the various steps taken during the investigation, summarizes the relevant evidence collected, lists material facts on which the parties agree, and lists material facts on which the parties do not agree. When the investigation report is complete, the investigator will transmit a copy to the Title IX Coordinator, who will ensure a copy of the investigative report is provided to each Party and their advisor.

XI. Adjudication
After the investigator has sent the investigation report to the parties, the Title IX Coordinator will transmit to each Party a notice advising the Party of the Hearing and Administrative Adjudication processes specified below. The hearing process will be used to adjudicate all Formal Complaints unless both parties timely consent to administrative adjudication or informal resolution.

Hearing Process
The school will utilize the following procedures to administer a hearing under this section.

Hearing Officer
After selection of the hearing process as the form of administrative adjudication, the Title IX Coordinator will promptly appoint a hearing officer who will oversee the hearing process and render a determination of responsibility for the allegations in the Formal Complaint, at the conclusion of the hearing process. The Title IX Coordinator will see that the hearing officer is provided a copy of the investigation report and a copy of all evidence transmitted to the parties by the investigator.

Hearing Notice and Response to the Investigation Report
After the hearing officer is appointed by the Title IX Coordinator, the hearing officer will promptly transmit written notice to the parties notifying the parties of the hearing officer's appointment; setting a deadline for the parties to submit any written response to the investigation report; setting a date for the pre-hearing conference; setting a date and time for the hearing; and providing a copy of the school's Hearing Procedures.
Neither the pre-hearing conference, nor the hearing itself, may be held any earlier than ten days from the date of transmittal of the written notice.

A Party's written response to the investigation report must include:
To the extent the Party disagrees with the investigation report, any argument or commentary regarding such disagreement;
Any argument that evidence should be categorically excluded from consideration at the hearing based on privilege, relevancy, the prohibition on the use of sexual history, or for any other reason;

A list of any witnesses that the Party contends should be requested to attend the hearing pursuant to an attendance notice issued by the hearing officer;
A list of any witnesses that the Party intends to bring to the hearing without an attendance notice issued by the hearing officer;
Any objection that the Party has to the school's Hearing Procedures;
Any request that the parties be separated physically during the pre-hearing conference and/or hearing;
Any other accommodations that the Party seeks with respect to the pre-hearing conference and/or hearing;
The name and contact information of the advisor who will accompany the Party at the pre-hearing conference and hearing;
If the Party does not have an advisor who will accompany the Party at the hearing, a request that the school provide an advisor for purposes of conducting questioning.

A Party's written response to the investigation report may also include:
Argument regarding whether any of the allegations in the Formal Complaint are supported by a preponderance of the evidence; and

Argument regarding whether any of the allegations in the Formal Complaint constitute Sexual Harassment.

Pre-Hearing Conference
Prior to the hearing, the hearing officer will conduct a pre-hearing conference with the parties and their advisors. By default, the pre-hearing conference will be conducted with the hearing officer, the parties, the advisors, and other necessary school personnel together in the same physical location. However, upon request of either Party, the parties will be separated into different rooms with technology enabling the parties to participate simultaneously and contemporaneously by video and audio.

During the pre-hearing conference, the hearing officer will discuss the hearing procedures with the parties; address matters raised in the parties' written responses to the investigation report, as the hearing officer deems appropriate; discuss whether any stipulations may be made to expedite the hearing; discuss the witnesses the parties have requested be served with notices of attendance and/or witnesses the parties plan to bring to the hearing without a notice of attendance; and resolve any other matters that the hearing officer determines, in the hearing officer's discretion, should be resolved before the hearing.

Issuance of Notices of Attendance
After the pre-hearing conference, the hearing officer will transmit notices of attendance to any school employee or student whose attendance is requested at the hearing as a witness. The notice will advise the subject of the specified date and time of the hearing and advise the subject to contact the hearing officer immediately if there is a material and unavoidable conflict.

Hearing Procedures
After the pre-hearing conference, the hearing officer will convene and conduct a hearing pursuant to the school's Hearing Procedures. The hearing will be audio recorded. The audio recording will be made available to the parties for inspection and review on reasonable notice, including for use in preparing any subsequent appeal.

The hearing will be conducted live, with simultaneous and contemporaneous participation by the parties and their advisors. By default, the hearing will be conducted with the hearing officer, the parties, the advisors, witnesses, and other necessary school personnel together in the same physical location. However, upon request of either Party, the parties will be separated into different rooms with technology enabling the parties to participate simultaneously and contemporaneously by video and audio.

While the Hearing Procedures and rulings from the hearing officer will govern the particulars of the hearing, each hearing will include, at a minimum:
Opportunity for each Party to address the hearing officer directly and to respond to questions posed by the hearing officer;
Opportunity for each Party's advisor to ask directly, orally, and in real time, relevant questions, and follow up questions, of the other Party and any witnesses, including questions that support or challenge credibility;
Opportunity for each Party to raise contemporaneous objections to testimonial or non-testimonial evidence and to have such objections ruled on by the hearing officer and a reason for the ruling provided;
Opportunity for each Party to submit evidence that the Party did not present during the investigation due to mistake, inadvertence, surprise, or excusable neglect;

Except as otherwise permitted by the hearing officer, the hearing will be closed to all persons except the parties, their advisors, the investigator, the hearing officer, the Title IX Coordinator, and other necessary school personnel. With the exception of the investigator and the parties, witnesses will be sequestered until such time as their testimony is complete.

During the hearing, the parties and their advisors will have access to the investigation report and evidence that was transmitted to them.

While a Party has the right to attend and participate in the hearing with an advisor, a Party and/or advisor who materially and repeatedly violates the rules of the hearing in such a way as to be materially disruptive, may be barred from further participation and/or have their participation limited, as the case may be, in the discretion of the hearing officer.

Subject to the minimum requirements specified in this Section, the hearing officer will have sole discretion to determine the manner and particulars of any given hearing, including with respect to the length of the hearing, the order of the hearing, and questions of admissibility. The hearing officer will independently and contemporaneously screen questions for relevance in addition to resolving any contemporaneous objections raised by the parties and will explain the rational for any evidentiary rulings. The hearing officer retains discretion to limit the number of witnesses present at the hearing if the hearing officer finds that testimony would be unreasonably cumulative, if the witnesses are offered solely as character references and do not have information relevant to the allegations at issue, or if the witnesses are offered to render testimony that is categorically inadmissible, such as testimony concerning sexual history of the Complainant.

The hearing is not a formal judicial proceeding and strict rules of evidence do not apply. The hearing officer will have discretion to modify these Hearing Procedures, when good cause exists to do so, and provided the minimal requirements specified above are met.

Subjection to Questioning
In the event that any Party or witness refuses to attend the hearing, or attends but refuses to submit to questioning by the Parties' advisors, the statements of that Party or witness, as the case may be, whether given during the investigation or during the hearing, will not be considered by the hearing officer in reaching a determination of responsibility.

Notwithstanding the foregoing, the hearing officer may consider the testimony of any Party or witness, whether given during the investigation or during the hearing, if the parties agree that the testimony may be considered or in the case where neither Party requested attendance of the witness at the hearing.
In applying this Section, the hearing officer will not draw an inference about the determination regarding responsibility based solely on a Party or a witness's absence from the live hearing and/or refusal to submit to questioning by the parties' advisors.

Deliberation and Determination
After the hearing is complete, the hearing officer will objectively evaluate all relevant evidence collected during the investigation, including both inculpatory and exculpatory evidence, together with testimony and non-testimony evidence received at the hearing, and ensure that any credibility determinations made are not based on a person's status as a Complainant, Respondent, or witness. The hearing officer will take care to exclude from consideration any evidence that was ruled inadmissible at the pre-hearing conference, during the hearing, or otherwise. The hearing officer will resolve disputed facts using a preponderance of the evidence (i.e., "more likely than not") standard and reach a determination regarding whether the facts that are supported by a preponderance of the evidence constitute one or more violations of the Policy as alleged in the Formal Complaint.

Written Decision
After reaching a determination and consulting with the appropriate school official and Title IX Coordinator as required above, the hearing officer will prepare a written decision that will include:
Identification of the allegations potentially constituting Sexual Harassment made in the Formal Complaint;
A description of the procedural steps taken by the school upon receipt of the Formal Complaint, through issuance of the written decision, including notification to the parties, interviews with the parties and witnesses, site visits, methods

used to gather non-testimonial evidence, and the date, location, and people who were present at or presented testimony at the hearing.
Articulate findings of fact, made under a preponderance of the evidence standard, that support the determination;
A statement of, and rationale for, each allegation that constitutes a separate potential incident of Sexual Harassment, including a determination regarding responsibility for each separate potential incident;
The discipline determined by the appropriate school official;
Whether the Complainant will receive any ongoing support measures or other remedies as determined by the Title IX Coordinator; and
A description of the school's process and grounds for appeal.
The hearing officer's written determination will be transmitted to the parties. Transmittal of the written determination to the parties concludes the hearing process, subject to any right of appeal.
Although the length of each adjudication by hearing will vary depending on the totality of the circumstances, the school strives to issue the hearing officer's written determination within 15 days of the conclusion of the hearing.

Discipline and Remedies
In the event the hearing officer determines that the Respondent is responsible for violating this Policy, the hearing officer will, prior to issuing a written decision, consult with an appropriate school official with disciplinary authority over the Respondent and such official will determine any discipline to be imposed. The hearing officer will also, prior to issuing a written decision, consult with the Title IX Coordinator who will determine whether and to what extent ongoing support measures or other remedies will be provided to the Complainant.

Violations of this Policy shall subject the individual to disciplinary action, which may include but is not limited to:
Disciplinary warning;
Disciplinary sanctions;
Disciplinary probation;
Housing suspension;
Disciplinary suspension; or
Disciplinary termination or dismissal.

If a student is found Responsible for Sex Discrimination and the sanction imposed makes the student ineligible to reenroll in the school (i.e., suspension or expulsion), the school will include a notation on the student's transcript. The student may request the removal of a transcript notation imposed under this Policy if:
the student becomes eligible to reenroll at the school; or
the school determines that good cause exists to remove the notation.
If the school receives an appropriate request by another postsecondary educational institution, the school will provide to the requesting institution information relating to the school's determination that the student violated this Policy.

Administrative Adjudication
In lieu of the hearing process, the Parties may consent to have a Formal Complaint resolved by administrative adjudication. Administrative adjudication is voluntary and must be consented to in writing by both parties and approved by the Title IX Coordinator. At any time prior to the issuance of the administrative officer's determination, a Party has the right to withdraw from administrative adjudication and request a live hearing.

If administrative adjudication is selected, the Title IX Coordinator will appoint an administrative officer. The Title IX Coordinator will see that the administrative adjudicator is provided a copy of the investigation report and a copy of all the evidence transmitted to the parties by the investigator.

The administrative officer will promptly send written notice to the Parties notifying the parties of the administrative officer's appointment; setting a deadline for the parties to submit any written response to the investigation report; and setting a date and time for each party to meet with the administrative officer separately. The administrative officer's meetings with the parties will not be held any earlier than ten (10) days from the date of transmittal of the written notice specified in this paragraph.

A Party's written response to the investigation report must include:
To the extent the party disagrees with the investigation report, any argument or commentary regarding such disagreement;
Any argument that a particular piece or class of evidence should be categorically excluded from consideration at the hearing based on privilege, relevancy, the prohibition on the use of sexual history, or for any other reason;

Argument regarding whether any of the allegations in the Formal Complaint are supported by a preponderance of the evidence;
Argument regarding whether any of the allegations in the Formal Complaint constitute Sexual Harassment.

After reviewing the Parties' written responses, the administrative officer will meet separately with each party to provide the Party with an opportunity make any oral argument or commentary the Party wishes to make and for the administrative officer to ask questions concerning the Party's written response, the investigative report, and/or the evidence collected during the investigation.

After meeting with each Party, the administrative officer will objectively revaluate all relevant evidence, including both inculpatory and exculpatory evidence and ensure that any credibility determinations made are not based on a person's status as a Complainant, Respondent, or witness. The administrative officer will take care to exclude from consideration any evidence that the administrative officer determines should be ruled inadmissible based on the objections and arguments raised by the Parties in their respective written responses to the investigation report. The administrative officer will resolve disputed facts using a preponderance of the evidence (i.e., "more likely than not") standard and reach a determination regarding whether the facts that are supported by a preponderance of the evidence constitute one or more violations of the Policy as alleged in the Formal Complaint.

Thereafter, the administrative officer will consult with any school official and the Title IX Coordinator and will prepare and transmit a written decision which shall serve as a resolution for purposes administrative adjudication. Transmittal of the administrative officer's written determination concludes the administrative adjudication, subject to any right of appeal.

Although the length of each administrative adjudication will vary depending on the totality of the circumstances, the school strives to issue the administrative officer's written determination within thirty days of the transmittal of the initiating written notice.

XII. Dismissal During Investigation or Adjudication

The school may dismiss a Formal Complaint at any point during the investigation or adjudication process if the Title IX Coordinator determines that any one or more of the following is true:
The Complainant provides the Title IX Coordinator written notice that the Complainant wishes to withdraw the Formal Complaint or any discrete allegations therein (in which case those discrete allegations may be dismissed);
The Respondent is no longer employed by the school; or
Specific circumstances prevent the school from gathering evidence sufficient to reach a determination as to the Formal Complaint, or any discrete allegations therein (in which case those discrete allegations may be dismissed).

In the event the Title IX Coordinator determines that a Formal Complaint should be dismissed pursuant to this Section, the Title IX Coordinator will provide written notice of dismissal to the parties and advise them of their right to appeal. The Title IX Coordinator may refer the subject matter of the Formal Complaint to other University offices, as appropriate. A dismissal pursuant to this Section is presumptively a final determination as it pertains to this Policy, unless otherwise specified in writing by the Title IX Coordinator in the written notice of dismissal.

XIII. Appeal

Grounds for Appeal

Either Party may appeal the determination of an adjudication, or a dismissal of a Formal Complaint, on one or more of the following grounds:
A procedural irregularity affected the outcome;
There is new evidence that was not reasonably available at the time the determination or dismissal was made, that could have affected the outcome;
The Title IX Coordinator, investigator, hearing officer, or administrative officer had a conflict of interest or bias for or against complainants or respondents generally, or against the individual Complainant or Respondent, that affected the outcome.
The sanctions imposed are substantially disproportionate to the severity of the violation.

Appeals are not intended to be full re-hearings of the complaint. In most cases, appeals are confined to a review of the written documentation and evidence available at the time of the Investigation, and pertinent documentation regarding the grounds for appeal.

Deadline to File Appeal

A Party must file an appeal within seven days of the date they receive notice of dismissal or determination appealed from or, if the other Party appeals, within three days of the other Party appealing, whichever is later. The appeal must be submitted in writing to the Title IX Coordinator, who will assign an appeal officer. The appeal must specifically identify the determination and/or dismissal appealed from, articulate which one or more of the three grounds for appeal are being asserted, explain in detail why the appealing Party believes the appeal should be granted, and articulate what specific relief the appealing Party seeks.

Resolution of Appeal
Promptly upon receipt of an appeal, the appeal officer will conduct an initial evaluation to confirm that the appeal is timely filed and that it invokes at least one of the permitted grounds for appeal. If the appeal officer determines that the appeal is not timely, or that it fails to invoke a permitted ground for appeal, the appeal officer will dismiss the appeal and provide written notice to the parties.

If the appeal officer confirms that the appeal is timely and invokes at least one permitted ground for appeal, the appeal officer will provide written notice to the other Party that an appeal has been filed and that the other Party may submit a written opposition to the appeal within seven days. The appeal officer will also promptly obtain from the Title IX Coordinator any records from the investigation and adjudication necessary to resolve the grounds raised in the appeal.

Upon receipt of any opposition, or after the time period for submission of an opposition has passed without one being filed, the appeal officer will promptly decide the appeal and transmit a written decision to the parties that explains the outcome of the appeal and the rationale. The determination of a Formal Complaint, including any discipline, becomes final when the time for appeal has passed with no Party filing an appeal or, if any appeal is filed, at the point when the appeal officer has resolved all appeals, either by dismissal or by transmittal of a written decision. No further review beyond the appeal is permitted.

Although the length of each appeal will vary depending on the totality of the circumstances, the school strives to issue the appeal officer's written decision within 10 days of an appeal being filed.

Sanctions During Appeal
All sanctions imposed by the original hearing body will be in effect during the appeal. A request may be made to the Title IX Coordinator for special consideration in exigent circumstances, but the presumptive stance of the institution is that the sanctions will stand.

XIV. Informal Resolution
The school may, in the Title IX Coordinator's discretion, facilitate an Informal Resolution in accordance with the protocol outlined below.

Guiding Principles
Generally, informal resolution involves a structured, supervised interaction between the Parties and/or other affected community members that seeks to identify and meet the needs of the Complainant while providing an opportunity for the Respondent and/or other affected community members to accept responsibility and repair harm (to the extent possible). Informal resolution may not include an investigation, hearing, or disciplinary action against a Respondent (including transcript notations), but may include imposing appropriate and reasonable remedies as agreed to by the Parties. All informal resolutions are facilitated by a trained administrator or outside expert.

Availability of Informal Resolution
Informal resolution is available in matters in which the Title IX Coordinator, in the Title IX Coordinator's discretion, determines it is appropriate. Factors the school will consider when determining whether a report of Prohibited Conduct is suitable for Alternative Resolution include, but are not limited to:
the nature and severity of the conduct, including whether the use of force or a weapon was involved;
the Respondent's prior known disciplinary or criminal conduct, including whether the school has received other reports of Prohibited Conduct committed by the Respondent;
whether the alleged incident poses a risk of harm to other individuals or the community;
the dynamics of power or control commonly associated with the alleged conduct or the nature of the parties' relationship;
whether multiple parties are affected or involved;
any admissions of responsibility by the Respondent; and
any other factor deemed relevant by the Title IX Coordinator or their designee in the interest of overall campus safety or safety of the parties involved.

Informal resolution will not be permitted if the Respondent is a non-student employee accused of committing Sexual Harassment against a student.

Informal Resolution Process
At any time after the parties are provided written notice of the Formal Complaint, and before the completion of any appeal, the parties may voluntarily consent, with the Title IX Coordinator's approval, to engage in mediation, facilitated resolution, or other form of dispute resolution the goal of which is to enter into a final resolution resolving the allegations raised in the Formal Complaint by agreement of the parties.

The specific manner of any informal resolution process will be determined by the Parties and the Title IX Coordinator, in consultation together. Prior to commencing the informal resolution process agreed upon, the Title IX Coordinator will transmit a written notice to the Parties that:
Describes the parameters and requirements of the informal resolution process to be utilized;
Identifies the individual responsible for facilitating the informal resolution (who may be the Title IX Coordinator, another school official, or a suitable third party);
Explains the effect of participating in informal resolution and/or reaching a final resolution will have on a Party's ability to resume the investigation and adjudication of the allegations at issue in the Formal Complaint; and
Explains any other consequence resulting from participation in the informal resolution process, including a description of records that will be generated, maintained, and/or shared.

After receiving the written notice specified in this paragraph, each Party must voluntarily provide written consent to the Title IX Coordinator, before the informal resolution may commence. The school will not pressure or compel any individual to engage in mediation, to directly confront the other, or to participate in any particular form of informal resolution. Individuals may be accompanied by an adviser or support person at any meetings related to the informal resolution process.

If the Parties reach a resolution through the informal resolution process, and the Title IX Coordinator agrees that the resolution is not clearly unreasonable, the Title IX Coordinator will reduce the terms of the agreed resolution to writing and present the resolution to the parties for their written signature. Once both parties and the Title IX Coordinator sign the resolution, the resolution is final, and the allegations addressed by the resolution are considered resolved and will not be subject to further investigation, adjudication, appeal, remediation, or discipline by the school, except as otherwise provided in the resolution itself, absent a showing that a Party induced the resolution by fraud, misrepresentation, or other misconduct or where required to avoid a manifest injustice to either Party or to the school.

Any final resolution pursuant to the informal resolution process will be documented and kept for at least seven years as required by law. However, no recording of the informal resolution process will be made and all statements made during the informal resolution process and may not be used for or against either party (and the hearing officer and appeal officer may not consider any such statement made during informal resolution) should the parties resume the grievance process. Failure to comply with an informal resolution agreement may result in disciplinary action.

Termination of Informal Resolution
A Party may withdraw their consent to participate in informal resolution at any time before a resolution has been finalized.

Deadlines for Informal Resolution
Absent extension by the Title IX Coordinator, any informal resolution process must be completed within 30 days. The Title IX Coordinator may adjust any time periods or deadlines in the investigation and/or adjudication process that were suspended due to the informal resolution.

During the pendency of the informal resolution process, the investigation and adjudication processes that would otherwise occur are stayed and all related deadlines are suspended.

XV. Other Investigation and Adjudication Considerations
Advisor of Choice
From the point a Formal Complaint is made, and until an investigation, adjudication, and appeal are complete, the Complainant and Respondent will have the right to be accompanied by an advisor of their choice to all meetings, interviews, and hearings that are part of the investigation, adjudication, and appeal process. The advisor may be, but is not required to be, an attorney.

Except for the questioning of witnesses during the hearing, the advisor will play a passive role and is not permitted to communicate on behalf of a Party, insist that communication flow through the advisor, or communicate with the school about the matter without the Party being included in the communication. In the event a Party's advisor of choice engages in material violation of this Policy, the school may preclude the advisor from further participation, in which case the Party may select a new advisor of their choice.

In the event a Party is not able to secure an advisor to attend the hearing, and requests the school to provide an advisor, the school will provide the Party an advisor, without fee or charge, who will conduct questioning on behalf of the Party at the hearing. The school will have sole discretion to select the advisor it provides.

Conflicts of Interest, Bias, and Procedural Complaints
The Title IX Coordinator, investigator, hearing officer, administrative officer, appeals officer, and informal resolution facilitator will be free of any material conflicts of interest or material bias. Any Party who believes one or more of these school officials has a material conflict of interest or material bias must raise the concern promptly so that the school may evaluate the concern and find a substitute, if appropriate. The failure of a Party to timely raise a concern of a conflict of interest or bias may result in a waiver of the issue for purposes of any appeal.
Parties are expected to raise any objections, concerns, or complaints about the investigation, adjudication, and appeals process in a prompt and timely manner so that the school may evaluate the matter and address it, if appropriate.

Treatment Records and Other Privileged Information
During the investigation and adjudication processes, the investigator and adjudicator are not permitted to access, consider, disclose, permit questioning concerning, or otherwise use:
a Party's records that are made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in the professional or paraprofessional's capacity, or assisting in that capacity, and which are made and maintained in connection with the provision of treatment to the Party; or
information or records protected from disclosure by any other legally-recognized privilege, such as the attorney client privilege
unless the school has obtained the Party's voluntary, written consent to do so for the purposes of the investigation and adjudication process.
Notwithstanding the foregoing, the investigator and/or adjudicator, may consider any such records or information otherwise covered by this Section if the Party holding the privilege affirmatively discloses the records or information to support their allegation or defense.

Sexual History
During the investigation and adjudication processes, questioning regarding a Complainant's sexual predisposition or prior sexual behavior are not relevant, unless such questions and evidence about the Complainant's prior sexual behavior are offered to prove that someone other than the Respondent committed the conduct alleged, or if the questions and evidence concern specific incidents of the Complainant's prior sexual behavior with respect to the Respondent and are offered to prove consent. Notwithstanding the foregoing, a Complainant who affirmatively uses information otherwise considered irrelevant by this Section for the purpose of supporting the Complainant's allegations, may be deemed to have waived the protections of this Section.

Student Withdrawal or Graduation Pending Disciplinary Charges
If a student withdraws or graduates from the school pending an investigation of a complaint of Sexual Misconduct under this Policy, the school will expedite the disciplinary process as necessary to accommodate both the Complainant and the Respondent's interest in a speedy resolution and continue the investigation with or without the participation of the Respondent.

Immunity for Victims and Witnesses
The school community encourages the reporting of Conduct Code violations, especially sexual misconduct. Sometimes, victims or witnesses are hesitant to report to school officials or participate in complaint processes because they fear that they themselves may be charged with policy violations. It is in the best interest of this community that as many victims as possible choose to report to school officials, and that witnesses come forward to share what they know. To encourage reporting, the school pursues a policy of offering victims and witnesses of sexual misconduct limited immunity from being charged for certain policy violations, for example, violation of the University's drug and alcohol policy, connected to the sexual misconduct incident. While these violations cannot be completely overlooked, the school will provide educational rather than punitive responses in such cases.

Immunity for Bystander Engagement

The welfare of students in our community is of paramount importance. At times, students on and off-campus may need assistance. The school encourages students to offer help and assistance to others in need. Sometimes, students are hesitant to offer assistance to others, for fear that they may get themselves in trouble. The school pursues a policy of limited or full immunity regarding certain violations for students who offer help to others in need. While policy violations cannot be overlooked, the school will provide educational options, rather than punishment, to those who offer their assistance to others in need.

XVI. Discretion in Application
Interpretation
The school retains discretion to interpret and apply this Policy in a manner that is not clearly unreasonable, even if the school's interpretation or application differs from the interpretation of the Parties.

The provisions of this Policy and the Hearing Procedures are not contractual in nature, whether in their own right, or as part of any other express or implied contract. Accordingly, the school retains discretion to revise this Policy and the Hearing Procedures at any time, and for any reason. The school may apply Policy revisions to an active case provided that doing so is not clearly unreasonable.

Outside Appointments, Dual Appointments, and Delegations
The school retains discretion to retain and appoint suitably qualified persons who are not school employees to fulfill any function of the school under this Policy, including, but not limited to, the investigator, hearing officer, administrative officer, informal resolution officer, and/or appeals officer. The University also retains discretion to appoint two or more persons to jointly fulfill the role of investigator, hearing officer, administrative officer, informal resolution officer, and/or appeals officer.

Other Sex-Based Misconduct
This Policy applies only to Sexual Harassment as defined in this Policy. Complaints of other forms of sex discrimination are governed by the school's Non-Discrimination Policy.

Resources and Referrals for Individuals Involved in Incidents of Sexual Misconduct
Contact Lifeline Hotline (rape crisis and victim support services
Website: https://www.dhss.delaware.gov/dhss/dph/dpc/sexualassault.html
Phone(302)761-9100

RAINN (Rape, Abuse and Incest National Network)
Website: www.rainn.org
Phone: (800) 656-4673

YWCA (sexual assault response center)
https://www.ywcade.org/what-we-do/sarc/
Phone: 800-773-8510

Office for Civil Rights (OCR) Website: http://www.ed.gov/ocr Phone: (800) 421-3481

Lactation Space
The School ensures parenting students can access a lactation space that is clean, shielded from view, free from intrusion from others, and may be used by a student for expressing breast milk or breastfeeding as needed. To request information on the lactation space available, contact the Assistant to the Director, Title IX Coordinator].

Additional Information
Students and employees may contact the Title IX Coordinator with any questions related to this policy. Concerns about the School's application of this policy and compliance with Title IX may also be addressed to U.S. Department of Education Office for Civil Rights ("OCR") at 400 Maryland Ave, SW Washington, D.C. 20202-1100, (800) 421-3481, http://www.ed.gov/ocr. For complaints involving employee-on-employee conduct, the Equal Employment Opportunity Commission or other appropriate state or federal enforcement agency can be contacted.

ANTI-HAZING POLICY

Purpose
Schilling-Douglas School of Hair Design is committed to maintaining a safe, respectful, inclusive and professional

educational environment in which every student can learn and participate without fear of physical, emotional, psychological or social harm. Schilling-Douglas School of Hair Design strictly prohibits every form of hazing. This Anti-Hazing Policy establishes the school standards for preventing, identifying, reporting, investigating and responding to hazing in order to promote student safety, protect individual dignity and ensure that participation in school activities, academic programs, student groups, clubs or other organized activities is never conditioned upon participation in harmful, humiliating, degrading, coercive or dangerous conduct. This policy is consistent with the Delaware Anti-Hazing Law, Title 14, Chapter 93 of the Delaware Code, including §§ 9301–9304.

Definition of Hazing

Hazing is any purposeful action or situation created during the process of becoming or maintaining membership in a group that could cause physical, emotional or psychological harm, including embarrassment, harassment or humiliation. Hazing may occur irrespective of a person's willingness to participate. The pressure to fit in, gain acceptance, maintain membership or avoid exclusion may remove an individual's true freedom of choice. Therefore, any individual stated willingness to participate does not make the conduct acceptable when the conduct constitutes hazing. Under Delaware law, hazing includes any action or situation that recklessly or intentionally endangers the mental or physical health or safety of a student or that willfully destroys or removes public or private property for purposes of initiation, admission, affiliation or continued membership in an organization operating under the sanction of or recognized by an institution of higher learning. Delaware law specifically includes physical brutality, forced physical activity, forced consumption of food, liquor, drugs or other substances, sleep deprivation, forced exclusion from social contact and conduct that may cause embarrassment, extreme mental stress or harm to mental health or dignity.

Prohibition of Hazing

Schilling-Douglas School of Hair Design prohibits all forms of hazing. No student, employee, instructor, administrator, student organization, club, group or other person associated with the school may directly or indirectly participate in hazing, organize or conduct hazing, encourage or facilitate hazing, require or pressure another person to participate in hazing, assist another person in carrying out hazing, permit hazing to occur when the person has authority or responsibility to prevent it, retaliate against a person who reports or participates in an investigation of suspected hazing or use membership, initiation, admission, affiliation, social acceptance, academic participation or continued membership as a basis for requiring or pressuring an individual to participate in hazing. Hazing is prohibited whether it occurs on campus or off campus when the conduct constitutes hazing under this policy or Delaware law. Delaware law specifically provides that institutional anti-hazing rules apply to acts conducted on or off campus when those acts constitute hazing.

Common Types of Hazing

While the following illustrate conduct that may constitute hazing, it is not exhaustive:

a) Physical Hazing: This includes whipping, beating, branding, forced body exercise, forced physical activity, forced exposure to unsafe conditions, forced consumption of food, liquor, drugs or other substances or any other forced physical activity that could adversely affect an individual's physical health or safety.

b) Substance-Related Hazing: Substance-related hazing includes coercing or forcing an individual to consume alcohol, consume drugs or other substances, consume excessive quantities of food or beverages, eat unappealing or otherwise inappropriate items or participate in activities involving substances that could endanger the individual's health or safety. The fact that an individual agrees to participate does not necessarily remove the conduct from the scope of this policy.

c) Psychological or Emotional Hazing: This includes humiliation, public degradation, verbal abuse, intimidation, threats, forced embarrassment, isolation, sleep deprivation, forced exclusion from social contact or other conduct that could adversely affect an individual's mental health, emotional well-being or dignity.

d) Isolation or Servitude Hazing: This includes forcing or pressuring individuals to run personal errands for other members, perform unreasonable or degrading tasks, endure isolation, obey arbitrary rules imposed only on new or less-established members, provide personal services to senior members or perform duties that are not required of other members.

e) Sexual or Criminal Hazing: This includes forcing, coercing, pressuring or encouraging an individual to perform sexual acts, participate in sexually humiliating conduct, engage in conduct that violates local, state or federal law or commit or participate in another criminal activity as a condition of joining, maintaining membership in or gaining acceptance from a group.

Where Hazing May Occur

Hazing can occur in any environment or setting associated with school activities or groups, including but not limited to the school environment, classrooms and instructional areas, student activities, academic clubs, student organizations,

social organizations, school-sponsored activities, off-campus activities associated with a school group, events, gatherings, trips or activities involving school-affiliated groups and electronic or online environments when the conduct is connected to school activities or membership in a school-affiliated group.

Prevention Strategy
Schilling-Douglas School of Hair Design will use proactive prevention strategy to prevent hazing before it occurs through the following ways:

a) Education and Awareness: The school will communicate anti-hazing policy to students and staff during orientation, in-house seminars and workshop programs. The school will emphasize that hazing is not an acceptable tradition, initiation practice, method of team or group bonding or requirement for membership.

b) Clear Expectations: The school leadership, instructors and staff responsible for student activities will establish clear expectations that membership in any association must never depend on participation in harmful or humiliating conduct. The school will stress that student have the right to decline participation in activities that violate this policy and no person may pressure another person to participate in prohibited conduct. More so, any individuals who report suspected hazing will not be subjected to retaliation.

c) Responsible Supervision: The school personnel responsible for student activities and organizations will monitor activities for conduct that could constitute hazing. Particular attention will be given to initiation, admission, orientation, membership and group-bonding activities where pressure to participate may occur.

d) Early Intervention: When the school personnel become aware of conduct that may constitute hazing, it will intervene promptly. Depending upon the circumstances, intervention may include stopping the activity, separating individuals from an unsafe situation, referring the matter for investigation, notifying appropriate administrative staff and contacting law enforcement when appropriate.

Implementation and Enforcement
Schilling-Douglas School of Hair Design will implement this policy through a consistent process for prevention, reporting, investigation, response and corrective action which include the following among others:

a) Reporting: Students, employees, instructors and other persons who know of, observe, experience or reasonably suspect hazing are encouraged to report the conduct promptly to the school administration. A report may be made even when the person reporting does not have complete information. Individuals should provide as much information as reasonably available including the people involved, location, approximate date and time, description of the conduct and any available witnesses or evidence.

b) Immediate Safety: When a report indicates an immediate threat to a person's physical or psychological safety, the school will take reasonable steps to address the immediate safety concern. Where the conduct may constitute a crime, the school may contact or cooperate with appropriate law-enforcement authorities.

c) Investigation: Reports of suspected hazing will be reviewed promptly and fairly. The school may interview individuals involved, review available documentation or other evidence and take other reasonable steps necessary to determine whether this policy has been violated. The school will maintain appropriate confidentiality to the extent reasonably possible while recognizing that confidentiality cannot always be guaranteed when an investigation or legal obligation requires disclosure.

d) Institutional Consequences: A student or other person found responsible for violating this policy may be subject to appropriate corrective or disciplinary action as required including warning, restriction from participation in school activities, suspension, dismissal or termination of enrollment. Institutional disciplinary action may occur in addition to criminal or civil consequences as applicable under the State of Delaware law.

Delaware Legal Requirements
Schilling-Douglas School of Hair Design recognizes that the State of Delaware law expressly prohibits hazing. Under 14 Del. C. § 9303, any person who causes or participates in hazing commits a Class B misdemeanor. Under 14 Del. C. § 9304, institutions are required to adopt a written anti-hazing policy, establish rules prohibiting hazing, provide an enforcement program and adopt appropriate penalties for violations. Institutional penalties may include fines, withholding of diplomas or transcripts pending compliance, probation, suspension or dismissal. The law also permits institutional action against organizations that authorize hazing in blatant disregard of institutional rules. Accordingly, Schilling-Douglas School of Hair Design will treat hazing as a serious violation of school policy and will cooperate with appropriate authorities when conduct may violate the State of Delaware criminal law or another applicable law.

Prohibition of Retaliation

Retaliation is prohibited against a person who, in good faith reports suspected hazing, participates in an investigation or provides information concerning suspected hazing. Any person who believes that they have experienced retaliation should report the matter to the Director of Schilling-Douglas School of Hair Design.

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