

Annual Security Report

Rev. 02/03/2026

Wethersfield Campus
632/657 Silas Deane Hwy
Wethersfield, CT 06109
(860) 571-0330, ext 1

Plainville Campus
65 Whiting St
Plainville, CT 06062
(860) 571-0330, ext 2

www.studyhair.com



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Office responsible: **Dean of Students**

Area information is located: **Admissions Office**

Date Document was last Updated: **February 2026**

Date Data Collected: **January 2026**

Campus Security

In accordance with the Crime Awareness and Campus Security Act of 1990, the **International Institute of Cosmetology** collects campus crime statistics and prepares this report for distribution to all current and prospective students and employees.

1. Campus is defined as "any building or property owned or controlled by the school within the same contiguous geographic area and used by the school in direct support of or related to its educational purpose." The campus includes the facilities located at both Wethersfield, CT and Plainville, CT. There are no buildings or properties owned or controlled by campus student organizations which are recognized by this institution.
2. The report is disseminated annually by September to all current and prospective students and employees. In addition, the report is provided to all individuals during enrollment or employment orientation which is conducted with each start class or upon hiring of a new employee. At that time students and employees review the report and receive a description of the campus security procedures and further information regarding the prevention of crimes. Each year an email blast will be sent to all enrolled students and staff, giving the website to access the updated report. A paper copy of this report and be requested in the admissions office.
3. No student will have access to the campus facilities, other than the parking area, at any time unless supervised by a staff member. Any off campus events which are sponsored by the school are supervised by school employees. Thus, the school will monitor and report any criminal activity at such events to local law enforcement authorities should they occur.
4. The campus does not employ security guards or have a campus police. The campus security authorities are Marie Bobair, Director of Education, Angela Urciuoli Asst. Director of Education, and Mark Anderson, School Dean. The security of the campus is the direct responsibility of each employee and the campus administrator. No such individuals have the authority to make arrests. All individuals are encouraged and requested to report immediately any known criminal offense or other emergency occurring on campus to the school administration office, and/or any staff member and are also encouraged to promptly report all crimes to appropriate police agencies. To report a crime to the campus call 860-571-0330 ext 111, if it is an emergency dial 9-1-1, or local police department. Any victim or witness can report any crime to the school anonymously and voluntarily.
5. All students and employees are encouraged to be responsible for their own security and the security of others.
6. Safety & Security Measures: Safety is maintained 24-7 with an alarm monitored security system, and surveillance cameras throughout the facility. Only certain management staff members have access to view the camera system which can save video in the event of shoplifting or criminal

activity. Any accident occurring on campus must be reported immediately to the Director of Education or the next in charge.

7. Access Policy: During normal business hours, IIC is open to all students, parents, employees, clients, contractors, and guests. During non-business hours, access to IIC is by select staff members with alarm codes. Additionally, maintenance and cleaning personnel have key access to building.
8. Statistics concerning the number of arrests for on-campus crimes of murder, forcible and non-forcible sex offenses, robbery, aggravated assault, burglary, motor vehicle theft and violations of liquor laws, drug abuse, weapons possession current to above report date are listed within this report.

Prevention/Counseling Services

Sexual assault prevention programs are discussed during new student/employee orientation which includes handouts and procedures directed toward personal protection, the prevention of crime, increasing awareness of rape, acquaintance rape, and other forcible and non-forcible sex offenses. List of CT registered sex offenders can be found at:

http://www.communitynotification.com/cap_office_disclaimer.php?office=54567

Additionally, a Title IX sexual assault training video is played for students during their orientation and the Title IX policy is shown to students.

The only on-campus services available to victims of sex offenses are described in this report. There is no on-campus victim counseling, mental health or other victim services available. However, the following are associations and help lines dedicated to assisting in the counseling and/or coping from sex offenses or mental health disorders:

Connecticut Sexual Assault Crisis Services, Inc	www.connsacs.org	888-999-5545
Rape Crisis Center of Milford, Inc	24/7 crisis hotline	203-878-1212
Wellpath Behavioral Health for Children & Families	www.wellpathct.org	203-756-7287
YWCA Sexual Assault Crisis Services (of New Britain)	www.ywcanewbritain.org/sacs	860-223-1787
Mental Health Association of Connecticut, Inc	www.mhact.org	800-842-1501
National Institute of Mental Health	www.nimh.nih.gov	
Substance Abuse and Mental Health Administration	www.samhsa.gov	

Crime Statistics

Annual crime statistics disclosures are compiled by the Dean of Students, data is collected through mailings sent to the Wethersfield and Plainville police departments and combined with any reports made to any School official. Victims or witnesses can report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics.

Wethersfield Campus (2025 Calendar Year)

Reporting Dates: January 1, 2025 – December 31, 2025

HATE CRIMES - ON CAMPUS (632/657 Silas Deane Hwy Wethersfield, CT 06109)									
	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin	2025 Total
Murder/ Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny – Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalism of Property	0	0	0	0	0	0	0	0	0

HATE CRIMES – ADJACENT PUBLIC PROPERTIES (Public Properties Surrounding the School)									
	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin	2025 Total
Murder/ Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny – Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/ vandalism of Property	0	0	0	0	0	0	0	0	0

	On Campus	ADJ Public Properties
CRIMINAL OFFENSES		
Murder/ Non-negligent Manslaughter	0	0
Negligent Manslaughter	0	0
Sex Offences- Forcible	0	0
Rape	0	0
Fondling	0	0
Sex Offences- Non-forcible	0	0
Incest	0	0
Statutory Rape	0	0

Robbery	0	0
Aggravated Assault	0	0
Burglary	0	0
Motor Vehicle Theft	0	0
Arson	0	0
Larceny - Theft	0	0
Unfounded Crimes	0	0
DISCIPLINARY ACTIONS		
Weapons: carrying, possessing, etc	0	0
Drug Abuse Violations	0	0
Liquor Law Violations	0	0
VIOLENCE AGAINST WOMEN ACT OFFENSES		
Domestic Violence	0	0
Dating Violence	0	0
Stalking	0	0
ARRESTS		
Weapons: carrying, possessing, etc	0	0
Drug Abuse Violations	0	0
Liquor Law Violations	0	0

Plainville Campus (2025 Calendar Year)

Reporting Dates: **January 1, 2025 – December 31, 2025**

HATE CRIMES - ON CAMPUS (65 Whiting St Plainville, CT 06062)									
	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin	2025 Total
Murder/ Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny – Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalism of Property	0	0	0	0	0	0	0	0	0

HATE CRIMES – ADJACENT PUBLIC PROPERTIES (Public Properties Surrounding the School)									
	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin	2025 Total
Murder/ Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny – Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0

Destruction/damage/ vandalism of Property	0	0	0	0	0	0	0	0	0
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	On Campus	ADJ Public Properties
CRIMINAL OFFENSES		
Murder/ Non-negligent Manslaughter	0	0
Negligent Manslaughter	0	0
Sex Offences- Forcible	0	0
Rape	0	0
Fondling	0	0
Sex Offences- Non-forcible	0	0
Incest	0	0
Statutory Rape	0	0
Robbery	0	0
Aggravated Assault	0	0
Burglary	0	0
Motor Vehicle Theft	0	0
Arson	0	0
Larceny - Theft	0	0
Unfounded Crimes	0	0
DISCIPLINARY ACTIONS		
Weapons: carrying, possessing, etc	0	0
Drug Abuse Violations	0	0
Liquor Law Violations	0	0
VIOLENCE AGAINST WOMEN ACT OFFENSES		
Domestic Violence	0	0
Dating Violence	0	0
Stalking	0	0
ARRESTS		
Weapons: carrying, possessing, etc	0	0
Drug Abuse Violations	0	0
Liquor Law Violations	0	0

Wethersfield Campus (2024 Calendar Year)

Reporting Dates: January 1, 2024 – December 31, 2024

HATE CRIMES - ON CAMPUS (632 Silas Deane Hwy Wethersfield, CT 06109)									
	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin	2024 Total
Murder/ Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny – Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalism of Property	0	0	0	0	0	0	0	0	0

HATE CRIMES – ADJACENT PUBLIC PROPERTIES (Public Properties Surrounding the School)									
	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin	2024 Total

Murder/ Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny – Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/ vandalism of Property	0	0	0	0	0	0	0	0	0

	On Campus	ADJ Public Properties
CRIMINAL OFFENSES		
Murder/ Non-negligent Manslaughter	0	0
Negligent Manslaughter	0	0
Sex Offences- Forcible	0	0
Rape	0	0
Fondling	0	0
Sex Offences- Non-forcible	0	0
Incest	0	0
Statutory Rape	0	0
Robbery	0	0
Aggravated Assault	0	0
Burglary	0	0
Motor Vehicle Theft	0	0
Arson	0	0
Larceny - Theft	1	1
Unfounded Crimes	0	0
DISCIPLINARY ACTIONS		
Weapons: carrying, possessing, etc	0	0
Drug Abuse Violations	0	0
Liquor Law Violations	0	0
VIOLENCE AGAINST WOMEN ACT OFFENSES		
Domestic Violence	0	0
Dating Violence	0	0
Stalking	0	0
ARRESTS		
Weapons: carrying, possessing, etc	0	0
Drug Abuse Violations	0	0
Liquor Law Violations	0	0

Plainville Campus (2024 Calendar Year)

Reporting Dates: January 1, 2024 – December 31, 2024

HATE CRIMES - ON CAMPUS (65 Whiting St Plainville, CT 06062)									
	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin	2024 Total
Murder/ Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0

Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny – Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalism of Property	0	0	0	0	0	0	0	0	0

HATE CRIMES – ADJACENT PUBLIC PROPERTIES (Public Properties Surrounding the School)									
	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin	2024 Total
Murder/ Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny – Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/ vandalism of Property	0	0	0	0	0	0	0	0	0

	On Campus	ADJ Public Properties
CRIMINAL OFFENSES		
Murder/ Non-negligent Manslaughter	0	0
Negligent Manslaughter	0	0
Sex Offences- Forcible	0	0
Rape	0	0
Fondling	0	0
Sex Offences- Non-forcible	0	0
Incest	0	0
Statutory Rape	0	0
Robbery	0	0
Aggravated Assault	0	0
Burglary	0	0
Motor Vehicle Theft	0	0
Arson	0	0
Larceny - Theft	0	0
Unfounded Crimes	0	0
DISCIPLINARY ACTIONS		
Weapons: carrying, possessing, etc	0	0
Drug Abuse Violations	0	0
Liquor Law Violations	0	0
VIOLENCE AGAINST WOMEN ACT OFFENSES		
Domestic Violence	0	0
Dating Violence	0	0
Stalking	0	0
ARRESTS		
Weapons: carrying, possessing, etc	0	0
Drug Abuse Violations	0	0
Liquor Law Violations	0	0

Wethersfield Campus (2023 Calendar Year)

Reporting Dates: January 1, 2023 – December 31, 2023

HATE CRIMES - ON CAMPUS (632 Silas Deane Hwy Wethersfield, CT 06109)									
	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin	2023 Total
Murder/ Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny – Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalism of Property	0	0	0	0	0	0	0	0	0

HATE CRIMES – ADJACENT PUBLIC PROPERTIES (Public Properties Surrounding the School)									
	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin	2023 Total
Murder/ Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny – Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/ vandalism of Property	0	0	0	0	0	0	0	0	0

	On Campus	ADJ Public Properties
CRIMINAL OFFENSES		
Murder/ Non-negligent Manslaughter	0	0
Negligent Manslaughter	0	0
Sex Offences- Forceable	0	0
Rape	0	0
Fondling	0	0
Sex Offences- Non-forceable	0	0
Incest	0	0
Statutory Rape	0	0
Robbery	0	0
Aggravated Assault	0	0
Burglary	0	0
Motor Vehicle Theft	0	0
Arson	0	0
Larceny - Theft	1	0
Unfounded Crimes	0	0
DISCIPLINARY ACTIONS		
Weapons: carrying, possessing, etc	0	0
Drug Abuse Violations	0	0

Liquor Law Violations	0	0
VIOLENCE AGAINST WOMEN ACT OFFENSES		
Domestic Violence	0	0
Dating Violence	0	0
Stalking	0	0
ARRESTS		
Weapons: carrying, possessing, etc	0	0
Drug Abuse Violations	0	0
Liquor Law Violations	0	0

Plainville Campus (2023 Calendar Year)

Reporting Dates: **January 1, 2023 – December 31, 2023**

HATE CRIMES - ON CAMPUS (65 Whiting St Plainville, CT 06062)									
	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin	2023 Total
Murder/ Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny – Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalism of Property	0	0	0	0	0	0	0	0	0

HATE CRIMES – ADJACENT PUBLIC PROPERTIES (Public Properties Surrounding the School)									
	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin	2023 Total
Murder/ Non-negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny – Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/ vandalism of Property	0	0	0	0	0	0	0	0	0

	On Campus	ADJ Public Properties
CRIMINAL OFFENSES		
Murder/ Non-negligent Manslaughter	0	0
Negligent Manslaughter	0	0
Sex Offences- Forcible	0	0
Rape	0	0
Fondling	0	0
Sex Offences- Non-forcible	0	0

Incest	0	0
Statutory Rape	0	0
Robbery	0	0
Aggravated Assault	0	0
Burglary	0	0
Motor Vehicle Theft	0	0
Arson	0	0
Larceny - Theft	0	1
Unfounded Crimes	0	0
DISCIPLINARY ACTIONS		
Weapons: carrying, possessing, etc	0	0
Drug Abuse Violations	0	0
Liquor Law Violations	0	0
VIOLENCE AGAINST WOMEN ACT OFFENSES		
Domestic Violence	0	0
Dating Violence	0	0
Stalking	0	0
ARRESTS		
Weapons: carrying, possessing, etc	0	0
Drug Abuse Violations	0	0
Liquor Law Violations	0	0

Emergency Procedure

The **Emergency Procedure Guide** contains instructions to assist members of the International Institute of Cosmetology's Community in responding to a variety of emergencies that may affect a campus. The most important information you can use in an emergency is 911 to contact police, fire or ambulance. A copy of the Emergency Response Guide can be found at the Admissions and Educator Offices.

Timely Warning

The school will provide timely warning to the campus community of any applicable crimes that have been reported to the campus administration or local police agencies that are considered to represent a continuing threat to students and/or employees. Crimes should be reported to International Institute of Cosmetology campus security authorities immediately to insure inclusion in the annual crime statistics and to aid in providing timely warning notices to students and staff when needed. The reporting of a crime that the school considers an ongoing "threat to students and staff" will result in a timely warning alarm. The timely warning alarm will be made verbally by an IIC administrator or educator and via our "ONE CALL NOW" Alert system. Instructions on how to proceed will be made on a situational basis. Should a timely warning alarm be made during non-business hours, our "ONE CALL NOW" system will send a text message and/or email to all students and staff with instructions as to how to proceed.

Notification System

Upon confirmation on a significant emergency or threat the institution will notify the campus community (students & staff) via our "ONE CALL NOW" system which sends text messages, phone calls, and/or emails. IIC will promptly determine the content of the notification and initiate the notification system, unless issuing notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency. Email and/or text notification will issue the threat, and/or evacuation that is needed. Email and/or text notification will be sent to all current students and staff at both campuses. The email and/or text will specify at which campus

the threat is. Email and Text notification system is tested annually by sending a test message to all recipients, both students and staff. Responsible staff to administer notification are: Damian Gugliotti (CFO), Martin Gugliotti (Dean of Students), Marie Bobair (Director of Education), Angela Urciuoli (Assistant Director of Education-Plainville, Mark Anderson (School Dean).

Initiating Emergency Protocol

In an emergency situation, initiating the Emergency Protocol will help save lives and assure proper notification and warning takes place. A supervisor is able to initiate the Emergency Protocol.

1. Call 911
2. Get yourself and if possible, others to safety. See **Emergency Procedures Guide** for “Evacuation/Shelter in Place” instructions
3. Notify community via “One Call Now” system

Drug Free Workplace/School

The Drug and Alcohol Abuse Prevention Program policy applies to all students and all employees. The unlawful possession, use, or distribution of illicit drugs and alcohol are strictly prohibited at the International Institute of Cosmetology and its grounds. Students or employees not complying with this standard will be subject to institutional sanctions.

The prohibitions for use, possession, and distribution of illegal drugs or alcohol apply to all persons on school property or as part of any school activity.

A copy of the **Drug Free School/Workplace Annual Disclosure** can be found at the Admissions and Educator Offices.

Crime Definitions (*from the Uniform Crime Reporting Handbook*)

Arson- Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property of another, etc.

Criminal Homicide—Manslaughter by Negligence- The killing of another person through gross negligence.

Criminal Homicide—Murder and Non-negligent Manslaughter- The willful (non-negligent) killing of one human being by another.

Robbery- The taking or attempting to take anything of value from the care, custody, or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.

Aggravated Assault- An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm. (It is not necessary that injury result from an

aggravated assault when a gun, knife, or other weapon is used which could and probably would result in serious personal injury if the crime were successfully completed.)

Burglary- The unlawful entry of a structure to commit a felony or a theft. For reporting purposes this definition includes: unlawful entry with intent to commit a larceny or felony; breaking and entering with intent to commit a larceny; housebreaking; safecracking; and all attempts to commit any of the aforementioned.

Motor Vehicle Theft-The theft or attempted theft of a motor vehicle. (Classify as motor vehicle theft all cases where automobiles are taken by persons not having lawful access even though the vehicles are later abandoned—including joyriding.)

Weapons: Carrying, Possessing, Etc.- The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices, or other deadly weapons.

Drug Abuse Violations-The violation of laws prohibiting the production, distribution, and/or use of certain controlled substances and the equipment or devices utilized in their preparation and/or use. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation, or importation of any controlled drug or narcotic substance. Arrests for violations of state and local laws, specifically those relating to the unlawful possession, sale, use, growing, manufacturing, and making of narcotic drugs.

Liquor Law Violations- The violation of state or local laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, or use of alcoholic beverages, not including driving under the influence and drunkenness.

Hate Crime Definitions (from the Uniform Crime Reporting Handbook)

Larceny-Theft (Except Motor Vehicle Theft)- The unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another. Attempted larcenies are included. Embezzlement, confidence games, forgery, worthless checks, etc., are excluded.

Simple Assault- An unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.

Intimidation- To unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack.

Destruction/Damage/Vandalism of Property- To willfully or maliciously destroy, damage, deface, or otherwise injure real or personal property without the consent of the owner or the person having custody or control of it.

[59 FR 22320, Apr. 29, 1994, as amended at 64 FR 59073, Nov. 1, 1999. Re-designated at 65 FR 65650, Nov. 1, 2000; 74 FR 55947, Oct. 29, 2009]

TITLE IX: SEXUAL HARASSMENT POLICIES & GRIEVANCE PROCEDURES

Introduction

The International Institute of Cosmetology (IIC) is committed to providing a working and educational environment for all students, faculty and staff that is free from sex discrimination, including sexual harassment. Every member of the IIC community should be aware that IIC is strongly opposed to sexual harassment, and that such behavior is prohibited by state and federal laws.

IIC does not discriminate on the basis of sex in its educational, extracurricular, or other programs or in the context of employment. Sex discrimination is prohibited by Title IX of the Education Amendments of 1972, a federal law that provides:

No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.

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

Scope of the Policy

This Policy governs sexual harassment that occurs in IIC's education programs or activities. This Policy applies to all students, employees, and third parties conducting business with IIC, regardless of the person's gender, gender identity, sexual orientation, age, race, nationality, class status, ability, religion or other protected status. IIC encourages victims of sexual harassment to talk to somebody about what happened – so victims can get the support they need, and so IIC can respond appropriately. As further described in this Policy, IIC will seek to respect a victim's request for confidentiality to the extent possible, while remaining ever mindful of the victim's well-being.

Prohibited Conduct

Sexual harassment comprises a broad range of behaviors focused on sex that may or may not be sexual in nature. Sexual harassment includes an IIC employee conditioning the provision of an IIC aid, benefit, or service on an individual's participation in unwelcome sexual conduct. Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to IIC's education programs or activities also constitutes sexual harassment. Sexual assault, stalking, domestic violence, and dating violence are all forms of sexual harassment. Retaliation following an incident of alleged sexual harassment or attempted sexual

harassment is strictly prohibited. The definitions for specific acts of sexual harassment can be found in the Definitions of Key Terms at the end of this Policy statement.

Sexual harassment can occur between strangers or acquaintances, or people who know each other well, including between people involved in an intimate or sexual relationship, can be committed by anyone regardless of gender identity, and can occur between people of the same or different sex or gender. **This Policy prohibits all forms of sexual harassment.**

Options for Assistance Following an Incident of Sexual Harassment

IIC strongly encourages any victim of sexual harassment to seek immediate assistance. Seeking prompt assistance may be important to ensure a victim's physical safety or to obtain medical care. IIC strongly advocates that a victim of sexual harassment report the incident in a timely manner. Time is a critical factor for evidence collection and preservation.

Reporting Incidents of Sexual Harassment

Victims of sexual harassment may file a report with the Wethersfield or Plainville Police Departments.

Wethersfield Police Department at 860-721-2900

Plainville Police Department at 860-747-1616

Victims may also file a report with IIC's Title IX Coordinator. More information about reporting an incident of sexual harassment can be found in Section 6 of this Policy, below.

IIC will respond promptly when it has actual knowledge of sexual harassment in its education programs or activities. The Title IX Coordinator will promptly contact the complainant to discuss the availability of supportive measures as described below, consider the complainant's wishes with respect to supportive measures, inform the complainant of the availability of supportive measures with or without the filing of a formal complaint, and explain to the complainant the process for filing a formal complaint. IIC will also provide the complainant with written notification about assistance available both within and outside of the IIC community.

A complainant may choose for the investigation to be pursued through the criminal justice system and/or through IIC's disciplinary procedures by filing a formal complaint as described in this Policy. IIC and the criminal justice system work independently from each other. Law enforcement officers do not determine whether a violation of this Policy has occurred. The Title IX Coordinator will guide the complainant through the available options and support the complainant in his or her decision.

Supportive Measures

IIC's Title IX Coordinator will work with all students affected by sexual harassment to ensure their safety and support their wellbeing. This assistance may include providing supportive measures to support or protect a student after an incident of sexual harassment and while an investigation or disciplinary proceeding is pending. Supportive measures are non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the complainant or the respondent before or after the filing of a formal complaint or where no formal complaint has been filed. Such measures are designed to restore or preserve equal access to IIC's education programs and activities without unreasonably burdening the other party, including measures designed to protect the safety of all parties or IIC's educational environment, or deter sexual harassment.

Supportive measures may include:

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

IIC will maintain as confidential any supportive measures provided to the complainant or respondent, to the extent that maintaining such confidentiality would not impair the ability of IIC to provide the supportive measures. The Title IX Coordinator is responsible for coordinating the effective implementation of supportive measures.

The measures needed by each student may change over time, and the Title IX Coordinator will communicate with each student throughout any investigation to ensure that any supportive measures are necessary and effective based on the students' evolving needs. Students who report an incident of sexual harassment may also be able to obtain a formal protection order from a civil or criminal court. IIC will work with the student and the applicable court to assist in the enforcement of any such protective orders.

Support Services Available

Counseling, advocacy and support services are available for complainants, whether or not a complainant chooses to make an official report or participate in IIC's disciplinary or criminal process. International Institute of Cosmetology does not provide counseling, mental health, or health care services.

Sexual harassment crisis and counseling options are available locally and nationally through a number of agencies, including:

National Resources:

National Sexual Assault Hotline: 800-656-4673
National Domestic Violence Hotline: 800-799-7233
National Institute of Mental Health: www.nimh.nih.gov
Substance Abuse and Mental Health Administration: www.samhsa.gov/find-help/national-helpline,
 1-800-662-HELP (4357)

Local Resources:

Wethersfield Victim Services: <https://wethersfieldct.gov/content/398/428/968/14440.aspx>
Connecticut Sexual Assault Crisis Services, Inc.: 888-999-5545
Wellpath Behavioral Health for Children & Families: 203-756-7287
YWCA Sexual Assault Crisis Services (of New Britain): 860-223-1787
Mental Health Association of Connecticut, Inc.: 800-842-1501

Evidence Preservation

Victims of sexual assault, domestic violence or dating violence should consider seeking medical attention as soon as possible. It is important that a victim of sexual assault not bathe, douche, smoke, change

clothing or clean the bed/linen where they were assaulted so that evidence necessary to prove criminal activity may be preserved. In circumstances where the victims do not opt for forensic evidence collection, health care providers can still treat injuries and take steps to address health concerns. Victims of sexual harassment are encouraged to also preserve evidence by saving text messages, instant messages, social networking pages, other communications, and keeping pictures, logs or other copies of documents, if they have any, that would be useful in connection with an IIC or police investigation.

Title IX Coordinator

IIC's Title IX Coordinator is responsible for monitoring and overseeing IIC's compliance with Title IX and the prevention of sexual harassment and discrimination. The Title IX Coordinator is:

- Knowledgeable and trained in IIC policies and procedures and relevant state and federal laws;
- Available to advise any individual, including a complainant, respondent, or a third party, about IIC and community resources and reporting options;
- Available to provide assistance to any IIC employee regarding how to respond appropriately to a report of Title IX-related prohibited conduct and related retaliation;
- Participates in ensuring the effective implementation of this Policy, including monitoring compliance with all procedural requirements, record keeping, and timeframes; and
- Responsible for overseeing training, prevention, and education efforts and annual reviews of climate and culture.

Inquiries or concerns about Title IX may be referred to IIC's Title IX Coordinator:

Mark Anderson, Title IX Coordinator
School Dean
632 Silas Deane Hwy.
Wethersfield, CT 06109
65 Whiting Street,
Plainville, CT 06062
Phone: (860) 571-0330, ext. 120, 159
Email: marka@studyhair.com

Reporting Policies and Protocols

International Institute of Cosmetology strongly encourages all members of the IIC community to report information about any incident of sexual harassment as soon as possible. Reports can be made either to IIC and/or to law enforcement.

Reporting to IIC

An incident of sexual harassment may be reported to IIC's Title IX Coordinator or Dean of Students. No other IIC officials or employees have the authority to IIC corrective measures under these Policies and Procedures on behalf of IIC. IIC will not be deemed to have actual knowledge of alleged sexual harassment unless IIC's Title IX Coordinator or Dean of Students possess such knowledge. Reports of sexual harassment to IIC officials or employees other than the Title IX Coordinator or the Dean of Students will not confer actual knowledge to IIC of such allegations, unless the Title IX Coordinator or Dean of Students subsequently obtain such actual knowledge.

If IIC's Title IX Coordinator is the alleged perpetrator of the sexual harassment, the report should be submitted to IIC's Dean of Students and vice versa. Filing a report with an IIC official will not obligate the victim to prosecute, nor will it subject the victim to scrutiny or judgmental opinions from officers.

Any person may report sex discrimination, including sexual harassment (whether or not the person reporting is the person alleged to be the victim of conduct that could constitute sex discrimination or sexual harassment), in person, by mail, by telephone, or by electronic mail, using the contact information listed in Section 6 for the Title IX Coordinator, or by any other means that results in the Title IX Coordinator or the Dean of Students receiving the person's verbal or written report. Such a report may be made at any time (including during non-business hours) by using the telephone number or email address, or by mail to the office address, listed for the Title IX Coordinator.

While there is no time limit for reporting, reports of sex discrimination or harassment should be brought forward as soon as possible. All incidents should be reported even if significant time has elapsed, but prompt reporting will better enable IIC to respond, investigate, provide an appropriate remedy, and impose discipline if appropriate. Note that if a complainant seeks to file a formal complaint for IIC to initiate an investigation into allegations of sexual harassment, the complainant must be participating in or attempting to participate in IIC's education programs or activities at the time of filing such formal complaint. IIC is committed to supporting the rights of a person reporting an incident of sexual harassment to make an informed choice among options and services available.

IIC will respond to all reports in a manner that treats each individual with dignity and respect and will take prompt responsive action to end any harassment, prevent its recurrence, and address its effects.

Reporting to Law Enforcement

An incident of sexual harassment can be reported to law enforcement at any time, 24 hours a day/7 days a week, by calling 911. At the complainant's request, IIC will assist the complainant in contacting law enforcement. If the complainant decides to pursue the criminal process, IIC will cooperate with law enforcement agencies to the extent permitted by law. A complainant has the option to decide whether or not to participate in any investigation conducted by law enforcement. Filing a police report will:

- Ensure that a victim of sexual assault receives the necessary medical treatment and tests
- Provide the opportunity for collection of evidence helpful in prosecution, which cannot be obtained later (ideally a victim of sexual assault should not wash, douche, use the toilet, or change clothing prior to a medical/legal exam)

Reporting of Crimes & Annual Security Reports

Campus safety and security are important issues at the International Institute of Cosmetology. Our goal is to provide students with a safe environment in which to learn and to keep students, parents, and employees well informed about campus security. The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, or Clery Act, requires institutions of higher education to record and report certain information about campus safety, including the number of incidents of certain crimes on or near campus, some of which constitute sexual harassment under this Policy.

Each year IIC prepares an annual security report to comply with the Clery Act. The full text of this report can be located on IIC's web site at www.studyhair.com. This report is prepared in cooperation with the local law enforcement agencies around our campus. Each year notification is made to all enrolled students and employees that provides the web site to access this report. Copies of the report may also

be obtained in person from the School Dean or by calling 860-571-0330 ext. 120, 159. All prospective employees may also obtain a copy from the School Dean.

Timely Warnings

In the event that a situation arises, either on or off campus, that, in the judgment of the School Dean constitutes an ongoing or continuing threat, a campus wide “timely warning” will be issued. The School Dean will immediately notify IIC’s community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or staff occurring at IIC, unless issuing a notification will compromise efforts to contain the emergency. The warning will be issued through the most effective and efficient means available and may include instant messaging to students and IIC employees. Notices may also be posted in the common areas throughout IIC. Anyone with information warranting a timely warning should report the circumstances to the School Dean by phone at calling 860-571-0330 ext. 120, 159 or in person at IIC. IIC will provide adequate follow-up information to the community as needed.

Third-Party and Anonymous Reporting

In cases where sexual harassment is reported to the Title IX Coordinator or Dean of Students by someone other than the complainant (by an instructor, classmate, or friend, for example), the Title IX Coordinator will promptly notify the complainant that a report has been received. This Policy and the Procedures will apply in the same manner as if the complainant had made the initial report. The Title IX Coordinator will make every effort to meet with the complainant to discuss available options and resources. Reports from an anonymous source will be treated in a similar fashion.

No Retaliation

IIC prohibits retaliation against any individual for the purpose of interfering with any right or privilege secured by Title IX, or because the individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in a Title IX investigation, proceeding, or hearing. IIC will take strong responsive action if retaliation occurs. Any incident of retaliation should be promptly reported to the Title IX Coordinator or the Dean of Students.

Except as may otherwise be required by law, IIC will keep confidential the identity of any individual who has made a report or complaint of sex discrimination, including any complainant, any individual who has been reported to be the perpetrator of sex discrimination, any respondent, and any witness.

Charging an individual with a violation of IIC’s code of conduct for making a materially false statement in bad faith in the course of a grievance proceeding does not constitute retaliation, provided, however, that a determination regarding responsibility, alone, is not sufficient to conclude that any party made a materially false statement in bad faith.

Coordination With Drug Free Institute Policy

Students may be reluctant to report instances of sexual harassment because they fear being disciplined pursuant to IIC’s alcohol or drug policies. IIC encourages students to report all instances of sexual harassment and will take into consideration the importance of reporting sexual harassment in addressing violations of IIC’s alcohol and drug policies. This means that, whenever possible, IIC will respond educationally rather than punitively to student alcohol or drug policy violations associated with reported sexual harassment.

IIC Policy on Confidentiality

IIC encourages victims of sexual harassment to talk to somebody about what happened – so victims can get the support they need, and so IIC can respond appropriately.

This Policy is intended to make students aware of the various reporting and confidential disclosure options available to them – so they can make informed choices about where to turn should they become a victim of sexual harassment. IIC encourages victims to talk to someone identified in one or more of these groups.

Privileged and Confidential Communications – Professional & Pastoral Counselors

Professional, licensed counselors and pastoral counselors who provide mental-health counseling to members of the community (and including those who act in that role under the supervision of a licensed counselor) are not required to report any information about an incident to the Title IX Coordinator without a victim's permission. *IIC does not provide professional or pastoral counseling, but can assist a victim of sexual harassment in obtaining support services from these groups or agencies.* Contact information for these support organizations is listed in Section 4 of this Policy.

NOTE: While these professional and pastoral counselors and advocates may maintain a victim's confidentiality vis-à-vis IIC, they may have reporting or other obligations under state law.

ALSO NOTE: If IIC determines that the alleged perpetrator(s) pose a serious and immediate threat to IIC community, IIC's School Dean may be called upon to issue a timely warning to the community. Any such warning should not include any information that identifies the victim.

Reporting to a Designated IIC Official

A “designated IIC official” is an IIC employee who has the authority to IIC corrective measures on behalf of IIC upon actual notice of sexual harassment.

A designated IIC official will report to the Title IX Coordinator all relevant details about the alleged sexual harassment shared by the complainant – including the names of the complainant and respondent, any witnesses, and any other relevant facts, including the date, time and specific location of the alleged incident.

To the extent possible, information reported to a designated IIC official will be shared only with people responsible for handling IIC's response to the report. Designated IIC officials should not share information with law enforcement without the complainant's consent or unless the complainant has also reported the incident to law enforcement.

In addition to the Title IX Coordinator, IIC's designated IIC officials include the Dean of Students.

Before a complainant reveals any information to a designated IIC official, the official should ensure that the complainant understands the official's reporting obligations – and, if the complainant wants to maintain confidentiality, direct the complainant to confidential resources.

If the complainant wants to tell the designated IIC official what happened but also maintain confidentiality, the official should tell the complainant that IIC will consider the request but cannot guarantee that IIC will be able to honor it. In reporting the details of the incident to the Title IX Coordinator, the official will also inform the Coordinator of the complainant's request for confidentiality.

Designated IIC officials will not pressure a complainant to request confidentiality, but will honor and support the complainant's wishes, including for IIC to fully investigate an incident. By the same token, designated IIC officials will not pressure a complainant to make a formal complaint and initiate an IIC investigation if the complainant is not ready to do so.

A complainant who at first requests confidentiality may later decide to file a formal complaint with IIC or report the incident to local law enforcement, and thus have the incident fully investigated.

Reporting to Title IX Coordinator

To the extent possible, information reported to the Title IX Coordinator will be shared only with people responsible for handling IIC's response to the report. The Title IX Coordinator should not share information with law enforcement without the complainant's consent or unless the complainant has also reported the incident to law enforcement.

Before a complainant reveals any information to the Title IX Coordinator, the Coordinator should ensure that the complainant understands the Coordinator's reporting obligations – and, if the complainant wants to maintain confidentiality, direct the complainant to confidential resources. If the complainant wants to tell the Title IX Coordinator what happened but also maintain confidentiality, the Coordinator should tell the complainant that IIC will consider the request but cannot guarantee that IIC will be able to honor it.

The Title IX Coordinator will not pressure a complainant to request confidentiality, but will honor and support the complainant's wishes, including for IIC to fully investigate an incident. By the same token, the Title IX Coordinator will not pressure a complainant to make a formal complaint and initiate an IIC investigation if the complainant is not ready to do so.

Requesting Confidentiality: How IIC Will Weigh the Request and Respond

If a complainant discloses an incident to the Title IX Coordinator but wishes to maintain confidentiality or requests that no investigation into a particular incident be conducted or disciplinary action taken, IIC must weigh that request against IIC's obligation to provide a safe, non-discriminatory environment for all students, including the complainant.

If IIC honors the request for confidentiality, a complainant must understand that IIC's ability to investigate the incident and pursue disciplinary action against the respondent will be limited. A complainant may provide the Title IX Coordinator with confidential knowledge of alleged sexual harassment and receive supportive measures from IIC without the complainant filing a formal complaint and initiating an investigation. Although rare, there are times when IIC may not be able to honor a complainant's request in order to provide a safe, non-discriminatory environment for all students.

The Title IX Coordinator will evaluate requests for confidentiality. When weighing a complainant's request for confidentiality or that no investigation or discipline be pursued, the Title IX Coordinator will consider a range of factors, including the following:

- The increased risk that the respondent will commit additional acts of sexual harassment or other violence, such as:
 - whether there have been other sexual harassment complaints about the same respondent;
 - whether the respondent has a history of arrests or records from a prior Institute

- indicating a history of violence;
- o whether the respondent threatened further sexual harassment or other violence against the complainant or others;
- o whether the sexual harassment was committed by multiple respondents;
- Whether the sexual harassment was perpetrated with a weapon;
- Whether the complainant is a minor;
- Whether IIC possesses other means to obtain relevant evidence of the sexual harassment (e.g., security cameras or personnel, physical evidence);
- Whether the complainant'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 Title IX Coordinator to file a formal complaint to investigate and, if appropriate, pursue disciplinary action. If none of these factors is present, IIC will likely respect the complainant's request for confidentiality.

If IIC determines that it cannot maintain a complainant's confidentiality, IIC will inform the complainant prior to starting an investigation and will, to the extent possible, only share information with people responsible for handling IIC's response. IIC will remain ever mindful of the complainant's well-being, and will take ongoing steps to protect the complainant from retaliation or harm and work with the complainant to create a safety plan. Retaliation against the complainant, whether by students or IIC employees, will not be tolerated. IIC will also:

- Assist the complainant in accessing other available victim advocacy, academic support, counseling, disability, health or mental health services, and legal assistance;
- Provide other security and support, which could include issuing a no-contact order, helping arrange a change of course schedules (including for the respondent pending the outcome of an investigation), or adjustments for assignments or tests; and
- Inform the complainant of the right to report a crime to local law enforcement – and provide the complainant with assistance if the complainant wishes to do so.

IIC may not require a complainant to participate in any investigation or disciplinary proceeding.

Because IIC is under a continuing obligation to address the issue of sexual harassment campus-wide, reports of sexual harassment (including non-identifying reports) will also prompt IIC to consider broader remedial action – such as increased monitoring, supervision or security at locations where the reported sexual harassment occurred; increasing education and prevention efforts, including to targeted population groups; conducting climate assessments/ victimization surveys; and/or revisiting its policies and practices.

If IIC determines that it can respect a complainant's request for confidentiality, IIC will also take action as necessary to protect and assist the complainant. This includes the Title IX Coordinator promptly contacting the complainant to discuss the availability of supportive measures. A complainant's request for confidentiality will limit IIC's ability to investigate a particular matter. IIC may take steps to limit the effects of the alleged sexual harassment and prevent its recurrence without initiating formal action against the respondent or revealing the identity of the student complainant. Examples include: providing increased monitoring, supervision, or security at locations or activities where the harassment occurred; providing training and education materials for students and employees; revising and

publicizing IIC's policies on sexual harassment; and conducting climate surveys regarding sexual harassment.

Off-campus Counselors and Advocates. Off-campus counselors, advocates, and health care providers will also generally maintain confidentiality and not share information with IIC unless the complainant requests the disclosure and signs a consent or waiver form. Contact information for these off-campus resources can be found in Section 4 of this Policy.

Formal Complaint Investigation Procedures and Protocols

IIC will investigate all formal complaints of sexual harassment. A formal complaint must be in writing filed by a complainant or signed by the Title IX Coordinator alleging sexual harassment against a respondent and requesting that IIC investigate the allegation of sexual harassment. A formal complaint form may be obtained from the Title IX Coordinator, although no particular form is required to submit a formal complaint so long as the complaint is in writing, signed by a complainant, alleges sexual harassment against a respondent, and requests an investigation. IIC's Title IX Coordinator oversees IIC's investigation, response to, and resolution of all reports of prohibited sexual harassment, and of related retaliation, involving students, faculty, and staff.

As soon as practicable after receiving a formal complaint, the Title IX Coordinator will make an initial assessment of the formal complaint to determine whether the formal complaint, on its face, alleges an act prohibited by this Policy. If the Title IX Coordinator determines the formal complaint states facts which, if true, could constitute sexual harassment in violation of this Policy, the Title IX Coordinator will proceed through the formal investigation process (see below). If the Title IX Coordinator determines the complainant's report does not state facts that, if true, could constitute a violation of this Policy, the Title IX Coordinator will communicate this determination in writing to the complainant. In such circumstances the complainant may still file a report with the federal Office for Civil Rights, the police, or seek available civil remedies through the judicial system. The complainant may also re-file the report with IIC upon discovery of additional facts.

IIC will dismiss a formal complaint if the conduct alleged in the formal complaint would not constitute sexual harassment under Title IX even if proved, did not occur in IIC's education program or activity, or did not occur against a person in the United States. ***Such dismissal does not preclude action under another provision of IIC's code of conduct.*** IIC may dismiss the formal complaint if a complainant notifies the Title IX Coordinator in writing that the complainant would like to withdraw the formal complaint; the respondent is no longer enrolled or employed by IIC; or specific circumstances prevent IIC from gathering evidence sufficient to reach a determination as to the formal complaint or allegations therein. IIC will promptly send written notice of the dismissal and reasons therefor simultaneously to the parties.

Notice

Upon receipt of a formal complaint, IIC will provide written notice of IIC's grievance process to the parties who are known. IIC will also provide the parties with notice of the allegations of sexual harassment potentially constituting sexual harassment, including sufficient details known at the time and with sufficient time to prepare a response before any initial interview. Sufficient details 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. The written notice will include a statement that the respondent is presumed not responsible for the alleged conduct and that a

determination regarding responsibility is made at the conclusion of the grievance process. The written notice will inform the parties that they may have an advisor of their choice, who may be, but is not required to be, an attorney, and may inspect and review evidence that is submitted to and/or collected by IIC in connection with the investigation. The written notice will also inform the parties of any provision in IIC's code of conduct that prohibits knowingly making false statements or knowingly submitting false information during the grievance process.

If, in the course of an investigation, IIC decides to investigate allegations about the complainant or respondent that are not included in a prior notice provided to the parties, IIC will provide notice of the additional allegations to the parties whose identities are known.

[Voluntary Resolution](#)

Voluntary resolution, when selected by all parties and deemed appropriate by the Title IX Coordinator, is a path designed to eliminate the conduct at issue, prevent its recurrence, and remedy its effects in a manner that meets the safety and welfare needs of IIC community. If all parties voluntarily agree to participate in an informal resolution that does not involve a full investigation and adjudication after receiving notice of a formal complaint and if IIC determines that the particular formal complaint is appropriate for such a process, IIC will facilitate an informal resolution to assist the parties in reaching a voluntary resolution. IIC retains the discretion to determine which cases are appropriate for voluntary resolution.

Voluntary resolution may include: conducting targeted or broad-based educational programming or training for relevant individuals or groups; providing increased monitoring, supervision, or security at locations or activities where the harassment occurred; facilitating a meeting with the respondent and the complainant present; and any other remedy that can be tailored to the involved individuals to achieve the goals of the Policy.

Voluntary resolution may also include restorative principles that are designed to allow a respondent to accept responsibility for harassment and acknowledge harm to the complainant or to IIC community. Restorative models will be used only with the consent of both parties and following a determination by the Title IX Coordinator that the matter is appropriate for a restorative approach.

IIC will not compel parties to engage in mediation or to participate in any particular form of informal resolution. As the title implies, participation in voluntary resolution is a choice, and either party can request to end this manner of resolution and pursue an investigation and adjudication at any time, including if voluntary resolution is unsuccessful at resolving the complaint.

In connection with any informal resolution process, IIC will provide written notice to the parties disclosing the allegations and the requirements of the informal resolution process. IIC will notify the parties that any time prior to agreeing to a resolution, any party has the right to withdraw from the informal resolution process and resume the grievance process with respect to the formal complaint. IIC must obtain the parties' voluntary, written consent to the informal resolution process. The informal resolution process may not be utilized to resolve allegations that an IIC employee sexually harassed a student.

The time frame for completion of voluntary resolution may vary, but IIC will seek to complete the process within 15 days of all the parties' request for voluntary resolution.

Formal Investigation Process

The burden of proof and the burden of gathering evidence sufficient to reach a determination regarding responsibility rests on IIC and not on the parties. The Title IX Coordinator is responsible for the investigation of a formal complaint. The Title IX Coordinator may designate a specially trained investigator (or team of investigators) to conduct the investigation.

IIC's process for responding to, investigating and adjudicating sexual harassment reports will continue during any law enforcement proceeding. The investigator may need to temporarily delay an investigation while the police are gathering evidence but will resume the investigation after learning that the police department has completed its evidence-gathering and will generally not wait for the conclusion of any related criminal proceeding.

The investigator will interview the complainant, respondent and any witnesses. They will also gather pertinent documentary materials (if any) and other information. IIC will provide, to a party whose participation is invited or expected, written notice of the date, time, location, participants, and purpose of all hearings, investigative interviews, or other meetings, with sufficient time for the party to prepare to participate. Each party shall have an equal opportunity to present witnesses, including fact and expert witnesses, and other inculpatory and exculpatory evidence. IIC will not restrict the ability of either party to discuss the allegations under investigation or to gather and present relevant evidence.

Time Frame for Investigation

Consistent with the goal to maximize educational opportunities and minimize the disruptive nature of the investigation and resolution, the Title IX Coordinator seeks to resolve all reports in a timely manner. In general, an investigation may last up to 30 days, from receipt of a formal complaint from the complainant or the Title IX Coordinator of the request to proceed with an investigation. Adjudication will generally take up to 30 days from the date the investigative report is provided to both the complainant and the respondent. The Title IX Coordinator may set reasonable time frames for required actions under the Policy. Those time frames may be extended for good cause as necessary to ensure the integrity and completeness of the investigation, comply with a request by external law enforcement, accommodate the availability of witnesses, accommodate absences or delays by the parties, the need for language assistance or accommodation of disabilities, account for IIC breaks or vacations, or address other legitimate reasons, including the complexity of the investigation (including the number of witnesses and volume of information provided by the parties) and the severity and extent of the alleged conduct. Any extension of the timeframes, and the reason for the extension, will be shared simultaneously with the parties in writing. Best efforts will be made to complete the process in a timely manner by balancing principles of thoroughness and fundamental fairness with promptness.

Where necessary, IIC will take prompt steps to protect complainants pending the final outcome of an investigation, including the provision of supportive measures to the complainant and/or the respondent. IIC may remove a respondent from IIC's education programs or activities on an emergency basis, provided that IIC undertakes 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, and provides the respondent with notice and an opportunity to challenge the decision immediately following the removal. IIC may place a non-student employee respondent on administrative leave during the pendency of a grievance process.

IIC will provide both parties an equal opportunity to inspect and review any evidence obtained as part of the investigation that is directly related to the allegations raised in the formal complaint, including the

evidence upon which IIC does not intend to rely in reaching a determination regarding responsibility and inculpatory or exculpatory evidence whether obtained from a party or other source, so that each party can meaningfully respond to the evidence prior to conclusion of the investigation. Prior to completion of the investigative report, IIC will send to each party and the party's advisor, if any, the evidence subject to inspection and review in an electronic format or a hard copy, and the parties will have at least 10 days to submit a written response, which the investigator will consider prior to completion of the investigative report. IIC will make all such evidence subject to the parties' inspection and review available at any hearing to give each party equal opportunity to refer to such evidence during the hearing, including for purposes of cross-examination

Investigation Report

The investigator will prepare an investigative report that fairly summarizes relevant evidence and, at least 10 days prior to a hearing, send to each party and the party's advisor, if any, the investigative report in an electronic format or a hard copy, for their review and written response. Such report will include a statement of the allegations and issues, the positions of the complainant and respondent, a summary of the evidence (including from interviews and documentation gathered), an explanation why any proffered evidence was not investigated, assessment of individual credibility, findings of fact, and an analysis of whether a violation of the Policy has occurred. The investigator will use "preponderance of the evidence" as the standard of proof to determine whether a violation of the Policy occurred. Preponderance of the evidence means that the party must present evidence that leaves one with a firm belief or conviction that it is more likely than not that the alleged conduct occurred. The complainant and respondent will be simultaneously notified of the completion of the investigation and provided with the investigator's report.

Grievance/Adjudication Procedures

Hearing Panel

IIC will convene a hearing panel following the end of the investigation. The hearing panel determines whether the respondent is responsible or not responsible for a violation of the Policy. If the respondent is determined to be responsible, the matter proceeds to the sanctions stage.

The hearing panel will consist of three members. The Title IX Coordinator will designate the members of the hearing panel but will not serve as a panel member. The investigator responsible for IIC's investigation of the formal complaint may not serve as a panel member. The hearing panel members may include administrators, officers, lawyers or other individuals with relevant experience and special training. Panel members may participate remotely so long as IIC utilizes technology enabling the panel members and parties to simultaneously see and hear the party or witness answering questions. All panelists will receive training from experts in the field at least once a year. In addition to training on how the adjudicatory process works, the training will include specific instruction about how to approach students about sensitive issues that may arise in the context of sexual harassment. The complainant and respondent will be informed of the panel's membership before the hearing process begins. A complainant and/or respondent may challenge the participation of a panel member because of perceived conflict of interest, bias, or prejudice. Such challenges, including rationale, must be made to the Title IX Coordinator at least three days prior to the commencement of the hearing. At its discretion, the Title IX Coordinator will determine whether such a conflict of interest exists and whether a panel member should be replaced. Postponement of a hearing may occur if a replacement panelist cannot be

immediately identified.

Advisors

Both the complainant and the respondent are entitled to be accompanied to any meeting or proceeding relating to the allegation of sexual harassment by an advisor or support person of their choice, provided the involvement of such advisor or support person does not result in the postponement or delay of such meeting as scheduled.

Written Submissions

Both the complainant and respondent will have the opportunity to submit written responses to the investigation report and other relevant information to the hearing panel. Each of the complainant and respondent will have the opportunity to review any written submissions by the other. The hearing panel may set reasonable parameters for these written submissions. The hearing panel will review the investigation report and written submissions.

Hearing Procedures

The Title IX Coordinator will give the complainant and respondent at least 10 days' advance notice of the hearing. The Title IX Coordinator may arrange to hold the hearing at an off-campus location. The hearing is a closed proceeding, meaning that no one other than the panel members, the complainant and respondent, their respective advisors, witnesses (when called), and necessary IIC personnel may be present during the proceeding. IIC Director will work with IIC staff so that any student whose presence is required may participate in the hearing.

In general, hearings will proceed as follows:

- The Title IX Coordinator may set reasonable time limits for any part of the hearing. Each of the complainant and respondent will have the opportunity to present witnesses and other information consistent with the Policy and these Procedures. The panel may determine the relevance of, place restrictions on, or exclude any witnesses or information. When the complainant and respondent are not able to be present for the hearing panel, arrangements will be made for participation virtually, with technology enabling the participants to see and hear each other simultaneously.
- In cases where either the complainant or respondent opts not to participate in the hearing, the panel may still hear from the other.
- Additional hearing rules include:
 - Cross Examination. At the hearing, the hearing panel shall permit each party's advisor to ask the other party and any witnesses all relevant questions and follow-up questions, including those challenging credibility. Such cross-examination at the live hearing must be conducted directly, orally, and in real time by the party's advisor of choice and never by a party personally.
 - At the request of either party, IIC will provide for the hearing to occur with the parties located in separate rooms with technology enabling the hearing panel members and parties to simultaneously see and hear the party or the witness answering questions.
 - Only relevant cross-examination and other questions may be asked of a party or witness. Before a complainant, respondent, or witness answers a cross-examination or other question, the hearing panel must first determine whether the question is relevant and explain any decision to exclude a question as not relevant.

- o If a party does not have an advisor present at the live hearing, IIC will provide without fee or charge to that party, an advisor of IIC's choice, who may be, but is not required to be, an attorney, to conduct cross-examination on behalf of that party.
- o Information Regarding Romantic or Sexual History. Questions and evidence about the 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 by the complainant, 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. The existence of a prior consensual dating or sexual relationship between the complainant and respondent by itself does not support an inference of consent to alleged sexual harassment.
- o Prior Conduct Violations. The hearing panel will not consider the respondent's prior conduct violations, unless the investigator provided that information to the hearing panel because the respondent was previously found to be responsible, and the previous incident was substantially similar to the present allegation(s) and/or the information indicates a pattern of behavior by the respondent.
- o If a party or witness does not submit to cross-examination at live hearing, the hearing panel will not rely on any statement of that party or witness in reaching a determination regarding responsibility; provided, however, that the hearing panel will not draw an inference about the determination regarding responsibility based solely on a party's or witness's absence from the hearing or refusal to answer cross-examination or other questions.
- o IIC will not require, allow, rely upon, or otherwise use questions or evidence that constitute, or seek disclosure of, information protected under a legally recognized privilege, unless the person holding such privilege has waived the privilege.
- o Live hearings may be conducted with all parties physically present in the same geographic location or, at IIC's discretion, any or all parties, witnesses, and other participants may appear at the live hearing virtually, with technology enabling participants to see and hear each other simultaneously.

IIC will create an audio or audiovisual recording, or transcript, of any hearing and make it available to the parties for inspection and review. The panelists may request a copy or transcript of the recording. Cell phones and recording devices may not be used in the hearing room(s) unless approved by the panel in advance.

Panel Determinations/Standard of Proof

The hearing panel will issue a written determination regarding responsibility. The panel will use "preponderance of the evidence" as the standard of proof to determine whether a violation of the Policy occurred. Preponderance of the evidence means that the party must present evidence that leaves one with a firm belief or conviction that it is more likely than not that the alleged conduct occurred. The panel will find a student responsible, or not responsible, based on a majority vote. The panel will generally render a written determination within 10 days after the conclusion of a hearing.

The panel's written determination will include:

- a) Identification of the allegations potentially constituting sexual harassment;

- b) A description of the procedural steps taken from the receipt of the formal complaint through the determination, including any notifications to the parties, interviews with parties and witnesses, site visits, methods used to gather other evidence, and hearings held;
- c) Findings of fact supporting the determination;
- d) Conclusions regarding the application of IIC's code of conduct to the facts;
- e) A statement of, and rationale for, the result as to each allegation, including a determination regarding responsibility, any disciplinary sanctions IIC imposes on the respondent, and whether remedies designed to restore or preserve equal access to IIC's education program or activity will be provided by IIC to the complainant; and
- f) IIC's procedures and permissible bases for the complainant and respondent to appeal.

The parties will be informed of the results of the adjudication hearing by simultaneous written notice to both parties of the outcome of the formal complaint. The determination regarding responsibility becomes final either on the date that IIC provides the parties with the written determination of the result of the appeal, if an appeal is filed, or if an appeal is not filed, the date on which an appeal would no longer be considered timely.

Sanctions and Other Remedies

The hearing panel shall be responsible for imposing sanctions that are:

- Fair and appropriate given the facts of the particular case;
- Consistent with IIC's handling of similar cases;
- Adequate to protect the safety of the campus community; and
- Reflective of the seriousness of sexual harassment.

No disciplinary sanctions or other actions that are not supportive measures will be imposed against a respondent until the completion of IIC's grievance procedures, including any applicable appeal.

The hearing panel will consider relevant factors, including if applicable: (1) the specific sexual harassment at issue (such as penetration, touching under clothing, touching over clothing, unauthorized recording, etc.); (2) the circumstances accompanying the lack of consent (such as force, threat, coercion, intentional incapacitation, etc.); (3) the respondent's state of mind (intentional, knowing, bias-motivated, reckless, negligent, etc.); (4) the impact of the offense on the complainant; (5) the respondent's prior disciplinary history; (6) the safety of IIC community; and (7) the respondent's conduct during the disciplinary process. The sanctioning decision will be communicated in writing to the complainant and the respondent as part of the hearing panel's written determination.

IIC may impose any one or more of the following sanctions on a student determined to have violated the Policy:

- Reprimand/warning;
- Changing the respondent's academic schedule;
- Disciplinary probation;
- Restricting access to IIC facilities or activities;
- Community service;
- Issuing a "no contact" order to the respondent or requiring that such an order remain in place;
- Dismissal or restriction from IIC employment;

- Suspension (limited time or indefinite); and
- Expulsion.

In addition to any other sanction (except where the sanction is expulsion), IIC may require any student determined to be responsible for a violation of the Policy to receive appropriate education and/or training related to the sexual harassment violation at issue. IIC may also recommend counseling or other support services for the student.

Whatever the outcome of the hearing process, a complainant may request ongoing or additional supportive measures and the Title IX Coordinator will determine whether such supportive measures are appropriate. Potential ongoing supportive measures include:

- Providing an escort for the complainant;
- Changing the complainant's academic schedule;
- Allowing the complainant to withdraw from or retake a class without penalty; and
- Providing access to tutoring or other academic support, such as extra time to complete or re-take a class.

IIC may also determine that additional measures are appropriate to respond to the effects of the incident on IIC community. Additional responses for the benefit of IIC community may include:

- Increased monitoring, supervision, or security at locations or activities where the harassment occurred;
- Additional training and educational materials for students and employees;
- Revision of IIC's policies relating to sexual harassment; and
- Climate surveys regarding sexual harassment.

Appeals

Either the respondent or the complainant or both may appeal from a determination regarding responsibility, and from a recipient's dismissal of a formal complaint or any allegations therein, on the following bases:

1. A procedural irregularity that affected the outcome of the matter;
2. New evidence that was not reasonably available at the time of the determination regarding responsibility or dismissal, that could affect the outcome of the matter; and
3. The Title IX Coordinator, investigator(s), or hearing panel member(s) had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the matter.

Disagreement with the finding or sanctions is not, by itself, grounds for appeals.

The decision maker(s) for the appeal may not be the same person as the hearing panel members, the investigator(s), or the Title IX Coordinator. The appealing party must submit the appeal in writing to IIC within seven days after receiving the written determination regarding responsibility. If either the complainant or respondent submits an appeal, the Title IX Coordinator will notify the other that an appeal has been filed and the grounds of the appeal. The non-appealing party may submit a written response within seven days after notice of an appeal.

If the decision-maker concludes that a change in the hearing panel's determination is warranted, IIC may enter a revised determination, reconvene the panel to reconsider the determination, or return the matter for additional investigation. If both the complainant and respondent appeal, the appeals will be considered concurrently.

The decision maker will issue a written decision describing the result of the appeal and the rationale for the result, and provide the written decision simultaneously to both parties. Appeals decisions will be rendered within 15 days after the receipt of the written appeal. All appeal decisions are final.

Records Disclosure & Recordkeeping

Disciplinary proceedings conducted by IIC are subject to the Family Educational Records and Privacy Act (FERPA), a federal law governing the privacy of student information. FERPA generally limits disclosure of student information outside IIC without the student's consent, but it does provide for release of student disciplinary information without a student's consent in certain circumstances.

Any information gathered in the course of an investigation may be subpoenaed by law enforcement authorities as part of a parallel investigation into the same conduct or required to be produced through other compulsory legal process.

Additional information about FERPA can be found in IIC's catalog, located on the Institution's website at www.studyhair.com.

IIC will, upon written request, disclose to the alleged victim of a crime of violence (as that term is defined in Section 16 of Title 18, United States Code), or a non-forcible sex offense, a report on the results of any disciplinary proceeding conducted by IIC against a student who is the alleged perpetrator of such crime or offense. If the alleged victim 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.

IIC will maintain for a period of not less than seven years records of –

- a) Each sexual harassment investigation including any determination regarding responsibility; any audio, audiovisual recording, or transcript from a hearing conducted in response to a formal complaint; any disciplinary sanctions imposed on the respondent; and any remedies provided to the complainant designed to restore or preserve equal access to IIC's education programs or activities;
- b) Any appeal and the result therefrom;
- c) Any informal resolution and the result therefrom; and
- d) All materials used to train Title IX Coordinators, investigators, hearing panel members, decision-makers, and any person who facilitates an informal resolution process. IIC will make these training materials publicly available on its website.

IIC will create and maintain for a period of not less than seven years, records of any actions, including any supportive measures, taken in response to a report or formal complaint of sexual harassment. In each instance, IIC will document the basis for its conclusion that its response was not deliberately indifferent, and document that it has taken measures designed to restore or preserve equal access to IIC's education program or activity. If an Institute does not provide a complainant with supportive measures, then IIC will document the reasons why such a response was not clearly unreasonable in light of the known circumstances. The documentation of certain bases or measures does not limit IIC in the

future from providing additional explanations or detailing additional measures taken.

13. Education and Prevention Programs

As set forth in Section 3 of this Policy statement, sexual assault, sexual harassment, dating violence, domestic violence, and stalking are all forms of prohibited conduct.

IIC is committed to offering educational programs to promote awareness and prevention of prohibited conduct. Educational programs include an overview of IIC's policies and procedures; relevant definitions, including prohibited conduct; discussion of the impact of alcohol and illegal drug use; consent; safe and positive options for bystander intervention; review of resources and reporting options available for students, faculty, and staff; and information about risk reduction. Incoming students and new employees will receive primary prevention and awareness programming as part of their orientation.

As part of IIC's commitment to provide an educational and work environment free from prohibited conduct, this Policy will be disseminated widely to IIC community through e-mail communication, publications, websites, new employee orientations, student orientations, and other appropriate channels of communication.

The Title IX Coordinator, investigators, hearing panel members, and anyone else who is involved in responding to, investigating, or adjudicating sexual harassment will receive annual training from experts in the field. In addition to training on how the adjudicatory process works, the training will include specific instruction about how to approach students about sensitive issues that may arise in the context of sexual harassment.

Definitions of Sexual Misconduct under Connecticut Law

Sexual Assault is any unwanted physical contact of a sexual nature that occurs either without the consent of each participant or when a participant is unable to give consent freely. Sexual assault can occur either forcibly and/or against a person's will, or when a person is unable to give consent freely. Non-consensual sexual intercourse is any form of sexual intercourse (vaginal, anal or oral) with any object without consent. Non-consensual sexual contact is any intentional sexual touching, however slight, with any object without a person's consent.

The Connecticut General Statutes provide the following definitions with respect to incidents of sexual assault:

Sec. 53a-70. Sexual assault in the first degree: Class B or A felony. (a) A person is guilty of sexual assault in the first degree when such

person (1) compels another person to engage in sexual intercourse by the use of force against such other person or a third person, or by the threat of use of force against such other person or against a third person which reasonably causes such person to fear physical injury to such person or a third person, or (2) engages in sexual intercourse with another person and such other person is under thirteen years of age and the actor is more than two years older than such person, or (3) commits sexual assault in the second degree as provided in section 53a-71 and in the commission of such offense is aided by two or more other persons actually present, or (4) engages in sexual intercourse with another person and such other person is mentally incapacitated to the extent that such other person is unable to consent to such sexual intercourse.

* * *

Sec. 53a-70a. Aggravated sexual assault in the

first degree: Class B or A felony. (a) A person is guilty of aggravated sexual assault in the first degree when such person commits sexual assault in the first degree as provided in section 53a-70, and in the commission of such offense (1) such person uses or is armed with and threatens the use of or displays or represents by such person's words or conduct that such person possesses a deadly weapon, (2) with intent to disfigure the victim seriously and permanently, or to destroy, amputate or disable permanently a member or organ of the victim's body, such person causes such injury to such victim, (3) under circumstances evincing an extreme indifference to human life such person recklessly engages in conduct which creates a risk of death to the victim, and thereby causes serious physical injury to such victim, or (4) such person is aided by two or more other persons actually present. No person shall be convicted of sexual assault in the first degree and aggravated sexual assault in the first degree upon the same transaction but such person may be charged and prosecuted for both such offenses upon the same information.

* * *

Sec. 53a-70b. Sexual assault in spousal or cohabiting relationship: Class B felony. (a) For the purposes of this section: (1) "Sexual intercourse" means vaginal intercourse, anal intercourse, fellatio or cunnilingus between persons regardless of sex. Penetration, however slight, is sufficient to complete vaginal intercourse, anal intercourse or fellatio and does not require emission of semen. Penetration may be committed by an object manipulated by the actor into the genital or anal opening of the victim's body; and (2) "Use of force" means: (A) Use of a dangerous instrument; or (B) use of actual physical force or violence or superior physical strength against the victim.

(b) No spouse or cohabitor shall compel the other spouse or cohabitor to engage in sexual intercourse by the use of force against such other spouse or cohabitor, or by the threat of the use of force against such other spouse or cohabitor which reasonably causes such other

spouse or cohabitor to fear physical injury. (c) Any person who violates any provision of this section shall be guilty of a class B felony.

* * *

Sec. 53a-70c. Aggravated sexual assault of a minor: Class A felony. (a) A person is guilty of aggravated sexual assault of a minor when such person commits a violation of subdivision (2) of subsection (a) of section 53-21 or section 53a-70, 53a-70a, 53a-71, 53a-86, 53a-87 or 53a-196a and the victim of such offense is under thirteen years of age, and (1) such person kidnapped or illegally restrained the victim, (2) such person stalked the victim, (3) such person used violence to commit such offense against the victim, (4) such person caused serious physical injury to or disfigurement of the victim, (5) there was more than one victim of such offense under thirteen years of age, (6) such person was not known to the victim, or (7) such person has previously been convicted of a violent sexual assault.

* * *

Sec. 53a-71. Sexual assault in the second degree: Class C or B felony. (a) A person is guilty of sexual assault in the second degree when such person engages in sexual intercourse with another person and: (1) Such other person is thirteen years of age or older but under sixteen years of age and the actor is more than three years older than such other person; or (2) such other person is mentally defective to the extent that such other person is unable to consent to such sexual intercourse; or (3) such other person is physically helpless; or (4) such other person is less than eighteen years old and the actor is such person's guardian or otherwise responsible for the general supervision of such person's welfare; or (5) such other person is in custody of law or detained in a hospital or other institution and the actor has supervisory or disciplinary authority over such other person; or (6) the actor is a psychotherapist and such other person is (A) a patient of the actor and the sexual intercourse occurs during the psychotherapy session, (B) a patient or former patient of the actor and such patient or former patient is emotionally dependent upon the

actor, or (C) a patient or former patient of the actor and the sexual intercourse occurs by means of therapeutic deception; or (7) the actor accomplishes the sexual intercourse by means of false representation that the sexual intercourse is for a bona fide medical purpose by a health care professional; or (8) the actor is a school employee and such other person is a student enrolled in a school in which the actor works or a school under the jurisdiction of the local or regional board of education which employs the actor; or (9) the actor is a coach in an athletic activity or a person who provides intensive, ongoing instruction and such other person is a recipient of coaching or instruction from the actor and (A) is a secondary school student and receives such coaching or instruction in a secondary school setting, or (B) is under eighteen years of age; or (10) the actor is twenty years of age or older and stands in a position of power, authority or supervision over such other person by virtue of the actor's professional, legal, occupational or volunteer status and such other person's participation in a program or activity, and such other person is under eighteen years of age.

* * *

Sec. 53a-72a. Sexual assault in the third degree: Class D or C felony. (a) A person is guilty of sexual assault in the third degree when such person (1) compels another person to submit to sexual contact (A) by the use of force against such other person or a third person, or (B) by the threat of use of force against such other person or against a third person, which reasonably causes such other person to fear physical injury to himself or herself or a third person, or (2) engages in sexual intercourse with another person whom the actor knows to be related to him or her within any of the degrees of kindred specified in section 46b-21.

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Sec. 53a-72b. Sexual assault in the third degree with a firearm: Class C or B felony. (a) A person is guilty of sexual assault in the third degree with a firearm when such person commits sexual assault in the third degree as provided in section 53a-72a, and in the commission of such

offense, such person uses or is armed with and threatens the use of or displays or represents by such person's words or conduct that such person possesses a pistol, revolver, machine gun, rifle, shotgun or other firearm. No person shall be convicted of sexual assault in the third degree and sexual assault in the third degree with a firearm upon the same transaction but such person may be charged and prosecuted for both such offenses upon the same information.

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Sec. 53a-73a. Sexual assault in the fourth degree: Class A misdemeanor or class D felony. (a) A person is guilty of sexual assault in the fourth degree when: (1) Such person intentionally subjects another person to sexual contact who is (A) under thirteen years of age and the actor is more than two years older than such other person, or (B) thirteen years of age or older but under fifteen years of age and the actor is more than three years older than such other person, or (C) mentally defective or mentally incapacitated to the extent that such other person is unable to consent to such sexual contact, or (D) physically helpless, or (E) less than eighteen years old and the actor is such other person's guardian or otherwise responsible for the general supervision of such other person's welfare, or (F) in custody of law or detained in a hospital or other institution and the actor has supervisory or disciplinary authority over such other person; or (2) such person subjects another person to sexual contact without such other person's consent; or (3) such person engages in sexual contact with an animal or dead body; or (4) such person is a psychotherapist and subjects another person to sexual contact who is (A) a patient of the actor and the sexual contact occurs during the psychotherapy session, or (B) a patient or former patient of the actor and such patient or former patient is emotionally dependent upon the actor, or (C) a patient or former patient of the actor and the sexual contact occurs by means of therapeutic deception; or (5) such person subjects another person to sexual contact and accomplishes the sexual contact by means of false representation that the sexual

contact is for a bona fide medical purpose by a health care professional; or (6) such person is a school employee and subjects another person to sexual contact who is a student enrolled in a school in which the actor works or a school under the jurisdiction of the local or regional board of education which employs the actor; or (7) such person is a coach in an athletic activity or a person who provides intensive, ongoing instruction and subjects another person to sexual contact who is a recipient of coaching or instruction from the actor and (A) is a secondary school student and receives such coaching or instruction in a secondary school setting, or (B) is under eighteen years of age; or (8) such person subjects another person to sexual contact and (A) the actor is twenty years of age or older and stands in a position of power, authority or supervision over such other person by virtue of the actor's professional, legal, occupational or volunteer status and such other person's participation in a program or activity, and (B) such other person is under eighteen years of age.

* * *

Connecticut law defines "Intimate partner violence" as any physical or sexual harm against an individual by a current or former spouse of or person in a dating relationship with such individual that results from any action by such spouse or such person that may be classified as a sexual assault under section 53a-70, 53a-70a, 53a-70b, 53a-71, 53a-72a, 53a-72b or 53a-73a, stalking under section 53a-181c, 53a-181d or 53a-181e, or family violence as designated under section 46b-38h. Conn. Gen. Stat. § 10a-55m(a)(4).

The Connecticut General Statutes provide the following definitions with respect to Stalking:

Sec. 53a-181c. Stalking in the first degree: Class D felony. (a) A person is guilty of stalking in the first degree when he commits stalking in the second degree as provided in section 53a-181d and (1) he has previously been convicted of this section or section 53a-181d, or (2) such conduct

violates a court order in effect at the time of the offense, or (3) the other person is under sixteen years of age. (b) Stalking in the first degree is a class D felony.

Sec. 53a-181d. Stalking in the second degree: Class A misdemeanor. (a) A person is guilty of stalking in the second degree when, with intent to cause another person to fear for his physical safety, he wilfully and repeatedly follows or lies in wait for such other person and causes such other person to reasonably fear for his physical safety. (b) Stalking in the second degree is a class A misdemeanor.

Sec. 53a-181e. Stalking in the third degree: Class B misdemeanor. (a) A person is guilty of stalking in the third degree when he recklessly causes another person to reasonably fear for his physical safety by willfully and repeatedly following or lying in wait for such other person. (b) Stalking in the third degree is a class B misdemeanor.

The Connecticut General Statutes provide the following definitions with respect to Family Violence:

Sec. 46b-38a. Family violence prevention and response: Definitions. For the purposes of sections 46b-38a to 46b-38f, inclusive:

(1) "Family violence" means an incident resulting in physical harm, bodily injury or assault, or an act of threatened violence that constitutes fear of imminent physical harm, bodily injury or assault, including, but not limited to, stalking or a pattern of threatening, between family or household members. Verbal abuse or argument shall not constitute family violence unless there is present danger and the likelihood that physical violence will occur.

(2) "Family or household member" means any of the following persons, regardless of the age of such person: (A) Spouses or former spouses; (B) parents or their children; (C) persons related by blood or marriage; (D) persons other than those persons described in subparagraph (C) of this subdivision presently residing together or

who have resided together; (E) persons who have a child in common regardless of whether they are or have been married or have lived together at any time; and (F) persons in, or who have recently been in, a dating relationship.

(3) "Family violence crime" means a crime as defined in section 53a-24, other than a delinquent act as defined in section 46b-120, which, in addition to its other elements, contains as an element thereof an act of family violence to a family or household member. "Family violence crime" does not include acts by parents or guardians disciplining minor children unless such acts constitute abuse.

Bystander Intervention

IIC's primary prevention and awareness program includes a description of safe and positive options for bystander intervention. Active bystanders take the initiative to help someone who may be targeted for a sexual assault. They do this in ways that are intended to avoid verbal or physical conflict. Active bystanders also take the initiative to help friends, who are not thinking clearly, from becoming offenders of crime. Intervention does not mean that you directly intervene to stop a crime in progress; rather, these steps are "early intervention" – before a crime begins to occur. There are three important components to consider before taking action that we refer to as the ABCs:

- **Assess for safety.** Ensure that all parties are safe, and whether the situation requires calling authorities. When deciding to intervene, your personal safety should be the #1 priority. When in doubt, call for help.
- **Be with others.** If it is safe to intervene, you are likely to have a greater influence on the parties involved when you work together with someone or several people. Your safety is increased when you stay with a group of friends that you know well.
- **Care for the person.** Ask if the target of the unwanted sexual advance/attention/behavior is okay – does he or she need medical care? Ask if someone they trust can help them get safely home.

Risk Reduction

IIC's primary prevention and awareness program includes information on risk reduction. This includes:

Avoiding Dangerous Situations. While you can never completely protect yourself from sexual assault, there are some things you can do to help reduce your risk of being assaulted.

- Be aware of your surroundings. Knowing where you are and who is around you may help you to find a way to get out of a bad situation.
- Try to avoid isolated areas. It is more difficult to get help if no one is around.
- Walk with purpose. Even if you don't know where you are going, act like you do.
- Trust your instincts. If a situation or location feels unsafe or uncomfortable, it probably isn't the best place to be.
- Try not to load yourself down with packages or bags as this can make you appear more vulnerable.
- Make sure your cell phone is with you and charged and that you have money for transportation.
- Don't allow yourself to be isolated with someone you don't trust or someone you don't know.
- Avoid putting headphones in or on both ears so that you can be more aware of your surroundings, especially if you are walking alone.

Safety Planning. Things to think about:

- How to get away if there is an emergency? Be conscious of exits or other escape routes. Think about options for transportation (car, bus, subway, etc.).
- Who can help? Friends and/or family, or support centers in your area. Please see Section 4 of this Policy for a list of support organizations.
- Where to go? Options may include a friend's or relative's house, or you may consider going to a domestic violence or homeless shelter. You may also go to the police. **Important Safety Note:** If the dangerous situation involves a partner, go to the police or a shelter first.

- What to bring? This may include important papers and documents such as a birth certificate, social security card, license, passport, medical records, lease, bills, etc. This will also include house keys, car keys, cash, credit cards, medicine, important numbers, and your cell phone. If you are bringing children with you, remember to bring their important papers and legal documents. You can keep all of these things in an emergency bag. You should hide the bag—it is best if it is not in your house or car. If the bag is discovered, you can call it a “tornado” or “fire” bag.

Protecting Your Friends. You have a crucial role to play in keeping your friends safe. No matter what the setting, if you see something that doesn't feel quite right or see someone who might be in trouble, there are some simple things you can do to help out a friend.

- Distract. If you see a friend in a situation that doesn't feel quite right, create a distraction to get your friend to safety. This can be as simple as joining or redirecting the conversation: suggest to your friend that you leave the party, or ask them to walk you home. Try asking questions like: “Do you want to head to the bathroom with me?” or “Do you want to head to another party – or grab pizza?”
- Step in. If you see someone who looks uncomfortable or is at risk, step in. If you feel safe, find a way to de-escalate the situation and separate all parties involved. Don't be shy about directly asking the person if they need help or if they feel uncomfortable.
- Enlist others. You don't have to go it alone. Call in friends or other people in the area as reinforcements to help defuse a dangerous situation and get the at-risk person home safely. There is safety in numbers.
- Keep an eye out. Use your eyes and ears to observe your surroundings. If you see someone who has had too much to drink or could be vulnerable, try to get them to a safe place. Enlist friends to help you. Even if you weren't around when the assault occurred, you can still support a friend in the aftermath.

Social Situations. While you can never completely protect yourself from sexual assault, there are some things you can do to help reduce your risk of being assaulted in social situations.

- When you go to a social gathering, go with a group of friends. Arrive together, check in with each other throughout the evening, and leave together. Knowing where you are and who is around you may help you to find a way out of a bad situation.
- Trust your instincts. If you feel unsafe in any situation, go with your gut. If you see something suspicious, contact law enforcement immediately.
- Don't leave your drink unattended while talking, dancing, using the restroom, or making a phone call. If you've left your drink alone, just get a new one.
- Don't accept drinks from people you don't know or trust. If you choose to accept a drink, go with the person to the bar to order it, watch it being poured, and carry it yourself. At parties, don't drink from the punch bowls or other large, common open containers.
- Watch out for your friends, and vice versa. If a friend seems out of it, is way too intoxicated for the amount of alcohol they've had, or is acting out of character, get him or her to a safe place immediately.

- If you suspect you or a friend has been drugged, contact law enforcement immediately. Be explicit with doctors so they can give you the correct tests (you will need a urine test and possibly others).

Information on Risk Reduction was provided by RAINN: Rape, Abuse & Incest National Network: www.rainn.org.

Amendments

IIC may amend the Policy or the Procedures from time to time. Nothing in the Policy or Procedures shall affect the inherent authority of IIC to take such actions as it deems appropriate to further the educational mission or to protect the safety and security of IIC community.

Definitions of Key Terms

- Sexual Harassment - means conduct on the basis of sex that satisfies one or more of the following:
 - 1) An employee of IIC conditioning the provision of an aid, benefit, or service of IIC on an individual's participation in unwelcome sexual conduct;
 - 2) Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to IIC's education programs or activities; or
 - 3) "Sexual assault," "dating violence," "domestic violence," or "stalking" as defined herein.
- Sexual Assault - An offense that meets the definition of rape, fondling, incest, or statutory rape as used in the FBI's Unified Crime Reporting ("UCR") program.
 - 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.
 - Sex Offenses - Any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent.
 - Fondling—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 incapacity.
 - Incest—Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
 - Statutory Rape—Sexual intercourse with a person who is under the statutory age of consent.
- Domestic Violence - A felony or misdemeanor crime of violence committed (i) by a current or former spouse or intimate partner of the victim; (ii) by a person with whom the victim shares a child in common; (iii) by a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner; (iv) 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, or (v) 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.

- Dating Violence - Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. 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 purpose 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.
- “Education program or activity” includes locations, events, or circumstances over which IIC exercises substantial control over both the respondent and the context in which the sexual harassment occurs. It includes all of the academic, educational, extra-curricular, and other programs of IIC, whether they take place in the facilities of IIC, at a class or training program sponsored by IIC at another location, or elsewhere. An instructor’s alleged sexual harassment of a student would likely constitute sexual harassment in IIC’s education programs or activities even if the alleged harassment occurs off campus. IIC’s education programs and activities may also include computer and internet networks, digital platforms, and computer hardware or software owned or operated by, or used in the operations of, IIC.
- Prohibited Conduct – IIC prohibits Sexual Assault, Sexual Harassment, Dating Violence, Domestic Violence, and Stalking as defined in these Definitions of Key Terms.
- Stalking - 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. 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. Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling. Reasonable person means a reasonable person under similar circumstances and with similar identities to the victim.
- Retaliation – IIC shall not, and no individual shall, intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by Title IX, or because the 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 Title IX and/or this Policy. The exercise of rights protected under the First Amendment does not constitute retaliation. Charging an individual with a code of conduct violation for making a materially false statement in bad faith in the course of a grievance proceeding does not constitute retaliation; provided, however, that a determination regarding responsibility alone is not sufficient to conclude that any party made a materially false statement in bad faith.
- Consent is a voluntary agreement to engage in sexual activity.
 - Past consent does not imply future consent.
 - Silence or an absence of resistance does not imply consent.
 - Consent to engage in sexual activity with one person does not imply consent to engage in sexual activity with another.
 - Consent can be withdrawn at any time.
 - Coercion, force, or threat of either invalidates consent.

Someone who is incapacitated cannot consent. Incapacitation refers to a situation in which a person is not capable of providing consent because the person lacks the ability to understand her or his decision. This situation may occur due to the use of drugs or alcohol, when a person is asleep or unconscious, or because of an intellectual or other disability that prevents the student from having the capacity to give consent.

- Complainant – means an individual who is alleged to be the victim of conduct that could constitute sexual harassment.
- Respondent – means an individual who has been reported to be the perpetrator of conduct that could constitute sexual harassment.