

# INNOVATE

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## SALON ACADEMY

### 2025 Annual Security Report (ASR)



Innovate Salon Academy shall be referred to as "The Academy" throughout this document.  
Revised 09/2025

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### ***Campus Contact Info***

712 NJ 70  
Brick, NJ 08723

*Compliance Office*  
*Compliance Director:*  
*Susan Guido*  
800-209-9982  
[Sguido@innovatesalonacademy.com](mailto:Sguido@innovatesalonacademy.com)

*Title IX Coordinator:*  
*Astrid Menicucci*  
800-209-9982  
[titleixcoordinator@innovatesalonacademy.com](mailto:titleixcoordinator@innovatesalonacademy.com)

*Emergency 911*

*Brick Township*  
*Police Department*  
732-262-1100

*Brick Township*  
*Fire Department*  
732-458-4100

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## INTRODUCTION

### Annual Disclosure of Crime Statistics

Innovate Salon Academy's Campus Safety and Security Report is published by October 1 of every year. This is the compliance document to the Federal Student Right to Know and Campus Security Act of 1990 also known as the Clery Act, with Higher Education Amendments. Crime statistics as listed in this pamphlet reflect reported crime only and are for calendar months January through December.

#### What is the Clery Act?

Signed into law in 1990, the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act) is a federal law that requires colleges and universities to disclose certain timely and annual information about campus crime and security policies.

All post-secondary public and private institutions participating in federal student aid programs must adhere to these regulations. The Clery Act was championed by Howard & Connie Clery after their daughter Jeanne was murdered at Lehigh University in 1986.

#### History of Jeanne Clery Act

In April 1986, Jeanne Clery's life ended tragically when another student raped and murdered her in her residence hall room. Alarmed at the lack of transparency around crime and violence on college campuses, Jeanne's parents, Connie and Howard, committed themselves to create enduring change.

#### What is Innovate Salon Academy obligated to do?

To ensure compliance with the Clery Act, The Academy must meet obligations in the following categories:

- Collect, classify and count crime statistics
- Issue campus alerts. To provide the campus community with information necessary to make informed decisions about their health and safety The Academy must:
  - Issue a timely warning for any Clery Act crime that represents an ongoing threat to the safety of students or employees.
  - Issue an emergency notification upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to health or safety of students or employees occurring on campus.
- Provide educational programs and campaigns that promote the awareness of dating violence, domestic violence, sexual assault and stalking, The Academy must:
  - provide primary prevention and awareness programs to all incoming students and new employees
  - provide ongoing prevention and awareness campaigns for students and employees.
- Have procedures for institutional disciplinary action in cases of dating violence, domestic violence, sexual assault and stalking. Disclose these policy and procedures in the annual security report.
- Publish an annual security report containing safety and security related policy statements and crime statistics. The Academy must distribute it to all current students and employees. Schools also must inform prospective students and employees about the availability of the report.
- Submit crime statistics to the Department. Each year in the fall The Academy must participate in a Web-based data collection to disclose crime statistics by type, location and year.

### Collection of Statistics

The Clery Act requires all institutions to collect crime reports from a variety of individuals and organizations that are considered to be "campus security authorities" under the law.

Under the Clery Act, a crime is "reported" when it is brought to the attention of a campus security authority or local law enforcement personnel by a victim, witness, other third party or even the offender. It doesn't matter whether or not the individuals involved in the crime, or reporting the crime, are associated with The Academy. If a campus security authority receives a report, he or she must include it as a crime report according to Academy procedures. The Academy must include statistics based on reports of alleged criminal incidents. It is not necessary for the crime to have been investigated by the police or a security authority, nor must a finding of guilt or responsibility be made to include the reported crime in The Academy's crime statistics.

The Annual Campus Safety and Security report is prepared in the Financial Aid office and is published on The Academy's website.

## **Reporting Clery Act Crimes**

Victims or witnesses are encouraged to report crimes on a voluntary, confidential basis for inclusion in the annual security report. Reports can be made directly to approved Campus Security Authorities or to the Brick Township Police Department (732)262-1100. The Academy encourages accurate and prompt reporting of all crimes to appropriate law enforcement agencies. Persons reporting criminal incidents should provide as much information as available. If possible, this should include the location, nature of injuries, the description of possible criminals, and briefly what happened. The Academy will utilize the Brick Township Police Department as required to protect victims, investigate incidents, and make arrests when necessary.

“Campus Security Authority” is a Clery Act-specific term that encompasses groups of individuals and organizations associated with an institution.

The Academy assigns CSA’s from officials of the Academy administrative staff officials. An “official” is defined as any person who has the authority and the duty to take action or respond to particular issues on behalf of The Academy. Administrative officials selected as CSA’s hold significant responsibility for student and campus activities.

Current Academy CSA’s

John Sickles jsickles@innovatesalonacademy.com

Donna Hernandez dhernandez@innovatesalonacademy.com

Sean Sickles ssickles@innovatesalonacademy.com

Angela Curbelo acurbelo@innovatesalonacademy.com

Compliance Director: Susan Guido sguido@innovatesalonacademy.com

Responsible for issuing timely warnings and data collection for annual statistical disclosures.

## **CAMPUS SECURITY POLICIES**

### **Emergency Response and Evacuation Procedures**

This policy establishes the emergency response and evacuation procedures for The Academy. This policy has been established to ensure, to the greatest extent possible, the safety and welfare of students and employees. This policy is aligned with and in compliance with the Higher Education Opportunity Act that requires all Title IV institutions, without exception, to have and disclose emergency response procedures in response to a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on the campus.

The requirements set forth in this policy are only applicable to emergency or dangerous situations occurring on campus.

The Academy may issue emergency notifications about emergency or dangerous situations that occur in the broader community if Academy officials determine that such notifications provide helpful or relevant information to the campus population.

The Academy will, upon confirmation of an ongoing significant emergency or dangerous situation that poses an imminent threat to the health and safety of campus community members, immediately issue emergency notifications to the students. While it is impossible to predict every significant or dangerous situation that may occur on campus, the following identified situations shall warrant an emergency notification after confirmation.

- Approaching tornado, hurricane or other extreme weather conditions
- Earthquake
- Gas leak
- Terrorist incident
- Armed intruder
- Bomb threat
- Civil unrest or rioting
- Explosion
- Nearby chemical or hazardous waste spill

Academy officials shall use their best, reasonable judgment in all other situations as to whether an emergency notification is warranted. Situations that may create business, academic or research interruptions, but do not pose a health or safety risk, do not necessitate an emergency notification. Notifications about such situations may include:

- Power outage
- Snow closure
- Temporary building closures

### **Emergency Notification**

The Academy will immediately notify the students and staff upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or employees occurring on campus. Confirmation means that a designated official (or officials) has verified that a legitimate emergency or dangerous situation exists. Confirmation doesn't necessarily mean that all of the pertinent details are known or even available.

The Academy will confirm that there is an emergency or dangerous situation on a case-by-case basis after consideration of the available facts, including factors such as the nature of the emergency and the continuing danger or risk to the campus community. The Compliance Director or designee will confer with the Owner and if needed, local authorities in order to confirm an emergency.

The Compliance director is the designated coordinator to in act emergency procedures and communication.

If the determination is made that an emergency notification will be issued, the Compliance Director will confer with the appropriate public and Academy officials in order to make a determination of who needs to be notified, and what the content of the notification should be.

This determination will be made giving consideration to who may be endangered by the emergency, who else may be affected by it, and what information is appropriate to communicate to them. The Compliance Director has the flexibility to discern whom to alert according to who may be at risk. In general, the entire campus community will be notified when there is at least the potential that a very large segment of the community will be affected by the situation, or when the situation threatens the operation of the campus as a whole. There will be continuing assessment of the situation and additional notifications may be issued if a situation warrants such action.

The Compliance Director will determine how much information is appropriate to disseminate at different points in time. Depending on what segments of the community notifications target, the content may differ.

### **Initiating the Notification System**

The Academy will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the notification system via Google Chat app, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to resolve the emergency.

As soon as The Academy has confirmed that a significant emergency or dangerous situation exists, the Compliance Director shall:

- Take into account the safety of the campus community
- Determine what information to release about the situation
- Begin the notification process

The only reason the Compliance Director would not immediately issue a notification for a confirmed emergency or dangerous situation would be if doing so would compromise efforts to:

- Assist a victim
- Contain the emergency
- Respond to the emergency
- Otherwise mitigate the emergency.

*The law doesn't specify who may or may not be a responsible authority except to qualify that they use professional judgment.*

The Academy will notify the campus community that there's an emergency or dangerous situation as follows:

- Notify first applicable local first responders
- Google Chat message system

Director of Operations: Angela Curbelo is responsible for initiating the emergency notification system.

Karen Young Compliance Director 800-209-9982 [kyoung@innovatesalonacademy.com](mailto:kyoung@innovatesalonacademy.com)

Responsibilities: Containing the Emergency

Fran Lillo Compliance Director 800-209-9982 [Flillo@innovatesalonacademy.com](mailto:Flillo@innovatesalonacademy.com)

Responsibilities: Containing the Emergency

Brick Township Police Department (732)262-1100

Brick Township Fire Department (732)458-4100

911 Emergency

Disseminating emergency information to the larger community.

The Academy disseminates emergency information to individuals and/or organizations outside of the campus community in the following ways:

- Cell phone alerts to students' parents and guardians via school app

- FaceBook and/or Instagram community page

The Compliance office is responsible for developing the information to be disclosed and for overseeing the dissemination of pertinent information to the larger community.

## **Testing of the Emergency Response and Evacuation Procedures**

The Academy tests the emergency response and evacuation procedures on at least an annual basis. Testing includes:

- Tests that may be announced or unannounced. Tests are regularly scheduled drills, include exercises and appropriate follow-through activities, designed for assessment and evaluation of The Academy's emergency plans and capabilities.
- Tests are conducted, at minimum, at least once a year and may be announced or not.

To comply with the Clery Act requirement the test must meet all of the criteria below:

- It must be scheduled. An actual emergency situation or a false emergency alarm served may not serve as a test of The Academy's procedures.
- Must contain drills. A drill is an activity that tests a single procedural operation (e.g., a test of initiating a cell phone alert system or a test of campus security personnel conducting a campus lockdown).
- Must contain exercises. An exercise is a test involving coordination of efforts (e.g., a test of the coordination of first responders, including police, firefighters and emergency medical technicians).
- Must contain follow-through activities. A follow-through activity is an activity designed to review the test (e.g., a survey or interview to obtain feedback from participants).
- Must be designed for assessment of emergency plans and capabilities. The test should have measureable goals. For example, "Everyone involved in the emergency response and notification procedures will understand his or her role and responsibility."
- Must be designed for evaluation of emergency plans and capabilities. Designed so that, using the assessments, The Academy can judge whether or not the test met its goals. For example, "The evacuation process accounted for/did not account for the diverse needs of all members of the campus community."

Tests must address emergency response and evacuation on a campus wide scale. "Campus wide" scale means that tests must address The Academy's plan for evacuating all campus buildings.

## **Documentation of Testing**

The Academy is required to document, for each test, a description of the exercise, the date, time and whether it was announced or unannounced. Although the law requires only one test each year, if The Academy has multiple tests in a year, documentation is required for each one.

Documentation must address each component:

- A description of the exercise (i.e., the test).
- The date the test was held.
- The time the test started and ended.
- Whether the test was announced or unannounced.

Clery Act-related documentation for emergency test documentation is required to be kept for seven years and is electronically filed on the Renaissance Secure drive.

## **Emergency Procedures**

Although emergencies cannot be predicted, it is the belief of Innovate Salon Academy that they can be effectively managed. The following procedure is to be followed if an emergency arises:

Staff member confirms the existence of the emergency or situation

Staff member determines if 911 must be called, and if so, calls 911

Staff member notifies Academy officials and announces the proper Alert Code (using Google Chat app)

Officials to notify: Emergency situations, call **911** Brick Township Police Department **732-262-1100** Brick Township Fire Department **732-458-4100**

### **Academy officials to notify:**

Academy Owners, Director of Operations, Director of Financial Aid, Admissions, Educators, Front Desk Staff

## Alert Code Reference

As a quick reference and reminder for all staff and students, the following Alert Codes will be used when an emergency situation arises. For specific information on each procedure, please refer to individual instructions:

CODE RED	Lockdown in place. Staff and students are to remain calm and do not leave the classroom.
CODE PURPLE	Evacuate the classroom and immediately exit through the front entrance only.
CODE YELLOW	Evacuate the classroom and immediately exit through the back exit only.
CODE GREEN	A dangerous situation has occurred outside of the building and no one is to leave the building.
CODE ORANGE	There has been a hostage, criminal/terroristic threat or situation.
All Clear	The emergency is over/codes are lifted

## EMERGENCY RESPONSE PROTOCOL

### CODE RED

1. Ensure all students are safe and remain in their classroom and remain as far from the door as possible.
2. Barricade doors and protect yourself.
3. No one exits the classroom until All Clear Code is given.

### CODE PURPLE

This evacuation procedure prepares students and staff for a situation in which it would be dangerous to remain in the building or close to it, i.e. a gas leak, loss of heat over an extended period, critical plumbing problem, tornado, hurricane, massive fire, etc. It is essential that all staff and students remain calm, as these situations only get worse if panic and hysteria develop, and exit calmly through the front entrance only.

### CODE YELLOW

This evacuation procedure prepares students and staff for a situation in which it would be dangerous to remain in the building or close to it, i.e. a gas leak, loss of heat over an extended period, critical plumbing problem, tornado, hurricane, massive fire, etc. It is essential that all staff and students remain calm, as these situations only get worse if panic and hysteria develop, and exit calmly through the back exit only.

### CODE GREEN

1. Ensure all students are safe and remain in their classroom and remain as far from the door as possible.
2. Barricade doors and protect yourself.
3. No one is to leave the building.

### CODE ORANGE

Upon receipt of criminal or terroristic threat, the individual receiving the information will inform Academy Officials or call 911, depending on the situation. At that time proper Alert Code will be announced.

What to do if a “Stranger” appears at the school, listen to your inner voice, or that “gut feeling”.

#### **Use your best judgment and common sense**

- Introduce yourself and ask if you can be of assistance. In the process, get their name and the reason for being in the Academy.
- If you are not satisfied with the answer, quickly and calmly call 911 or alert the Brick Township Police Department of an emergency.



## **Evacuation Procedures**

An evacuation of part or all of campus may be required before, during, or after a significant incident, emergency, disaster or major disaster, or catastrophic incident. An evacuation may constitute the movement of people from one area of the campus to another, or it could require movement to an off-campus location away from the hazards affecting an evacuation requirement. Such an evacuation may lead to an eventual return to the campus, or may involve reunification and/or mass transportation efforts in the event the return of people to the campus is not feasible.

### **Procedures**

The primary goal is a safe and orderly evacuation to save lives and allow responding emergency personnel unimpeded access to address the campus incident.

- The authority to issue a campus evacuation order rests with the Compliance Director or their designee; the authority to issue an order covering the area surrounding and/or including the campus rests with the City according to its ordinances and plans.
- Alert local officials of evacuation plan.
- The evacuation order should not be lifted until consultation is made between the Academy and city officials. The authority to lift a campus evacuation order rests with the Compliance Director or their designee; the authority to lift an order covering the area surrounding and/or including the campus, issued by the city, rests with the city according to its ordinances and plans.

## **Security and Access to Campus Facilities**

Employees seeking access to campus, outside established operational hours, must have prior permission from John Sickles 800-209-9982 [jsickles@innovatesalonacademy.com](mailto:jsickles@innovatesalonacademy.com).

Security of the campus facility is top priority in maintaining a safe campus. Exterior entries are monitored by digital surveillance 24 hours a day.

## **Security Considerations Used In the Maintenance of Campus Facilities**

The Director of operations oversees the physical safety of the facility. The Director of operations works in tandem with Academy owners to ensure pathways and entrances are well lit and that entry locks are in working order.

Note: Innovate Salon Academy does not have on-campus residences.

## **Campus and Security Education**

Information about emergency response procedures is provided at the beginning of enrollment at student orientation, and it is re-emphasized throughout the year on a campus-wide basis as other relevant advisories are issued. Information on how to receive emergency notifications is also located in The Academy security report which is provided electronically to the entire campus community on an annual basis. A common theme of procedures is to encourage students and employees to be aware of their responsibility for their own security and the security of others. The Academy does not have a crime prevention program.

## **Campus Law Enforcement**

The Academy does not employ campus law enforcement or security personnel.

### **Fire Emergency:**

*What should I do if a fire breaks out?*

- Close the door to the fire area.
- Immediately inform any staff member.
- Calmly but quickly exit the building.
- Remain at least 100 feet from the building.
- Pay close attention to information or requests made by the Brick Township Fire Department, Brick Township Police Department, or Innovate Salon Academy.

### **Location of fire extinguishers:**

- By front door
- Outside of the student bathrooms
- Outside of the shampoo sink room
- By first classroom on the right
- By second classroom on the right



# FIRE & SAFETY DRILLS

## **Procedure for Fire Drill**

To promote the safety of all students and staff Fire Drills will be conducted once a month by the Lead Educators. Educators will take attendance once students are safely away from the building. Fire Drills records are kept and maintained by the Lead Educators.

## **Procedure for Inside Safety Drill**

To promote the safety of all students and staff Inside Safety Drills will be conducted once a month (unannounced) by the Lead Educators. Codes will be announced and proper procedures will be followed. Educators will take attendance once students are safely where they need to be according to the Alert Codes.

## **Timely Warning Policy**

### **PURPOSE**

In compliance with the Jeanne Clery Disclosure of Campus Security Policy & Campus Crime Statistics Act (Clery Act), Innovate Salon Academy shall issue Timely Warnings to notify members of the Academy community about certain crimes/incidents as defined in the Clery Act and as set forth in Innovate Salon Academy's Reporting Crimes for Annual Security Report (Clery Act) Policy, as well as, non-Clery Act crimes/incidents. Safety Alerts shall be issued in a manner that is timely and will aid in the prevention of similar crimes/incidents when such crimes/incidents occur on the Innovate Salon Academy campus or in close proximity to the campus, and when the crime represents a serious or continuing threat to students, employees and members of the Academy community.

### **Crimes Exempt From the Timely Warning Requirement:**

The Academy is not required to provide a timely warning for non-Clery Act crimes or for crimes reported to a pastoral or professional counselor. There are no other exemptions.

### **Pastoral and Professional Counselors:**

The Academy does not employ or have affiliation with Pastoral or Professional counselors.

### **Timely Manner**

A Safety Alert shall be issued in a timely manner in order to enable the campus community to protect themselves and shall be issued, on a case-by-case basis, as soon as the pertinent information is available, in light of all facts surrounding the crime/incident.

### **Individual and Office responsible for issuing timely warnings:**

Office: Director of Operations 800-209-9982 [sguido@innovatesalonacademy.com](mailto:sguido@innovatesalonacademy.com)

### **Criteria**

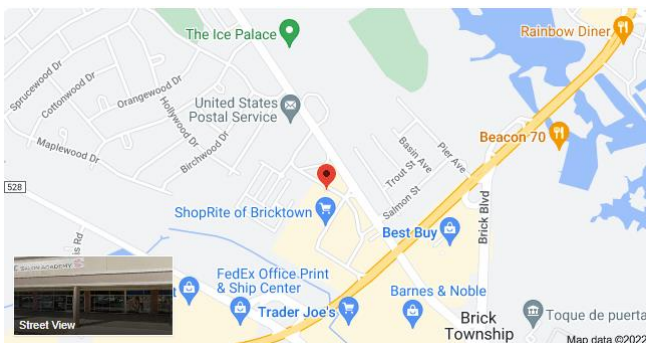
In compliance with the Clery Act, the following criteria will be evaluated to determine if a Safety Alert shall be issued:

#### *Nature of the Crime/Incident*

Safety Alerts may be issued for certain crimes/incidents as defined in the Clery Act and as set forth in Innovate Salon Academy's Reporting Crimes for Annual Security Report (Clery Act) Policy. Timely warnings may be issued for threats to persons or threats to property.

#### *Geographic Location*

Timely warnings may be issued for any Clery Act crime which occurs: 1. on campus (712 NJ 70 Brick, NJ), 2. on public property within or immediately adjacent to the campus (an area of Brick, NJ) and (3) in or on non-campus buildings or property that Innovate Salon Academy owns or controls and such crimes been reported to Innovate Salon Academy.



#### *Continued Threat or Danger to the Campus Community*

The Academy shall consider whether or not the crime/incident represents a serious or ongoing threat to the Academy community. Such situations shall be evaluated on a case-by-case basis taking into account: the need to alert the campus community in order to enable people to protect themselves; to aid in the prevention of similar crimes/incidents; and the continuing danger to the Academy community; and the risk of compromising law enforcement efforts to resolve the case in a timely manner. The possible risk of compromising law enforcement efforts to resolve the case in a timely manner may also be considered; however, in the event of a serious or continuing threat to students or employees, a timely warning shall be issued, but the timely warning shall not require the disclosure of specific law enforcement efforts which could compromise an ongoing criminal investigation.

## Method

The Safety Alert shall be issued using a method that allows for the prompt notification of the Academy community. Methods of dissemination may include, but are not limited to, e-mail, voicemail, emergency notification system and the Innovate Salon Academy website. Safety Alerts shall include information which would promote safety and aid in the prevention of similar crimes/incidents.

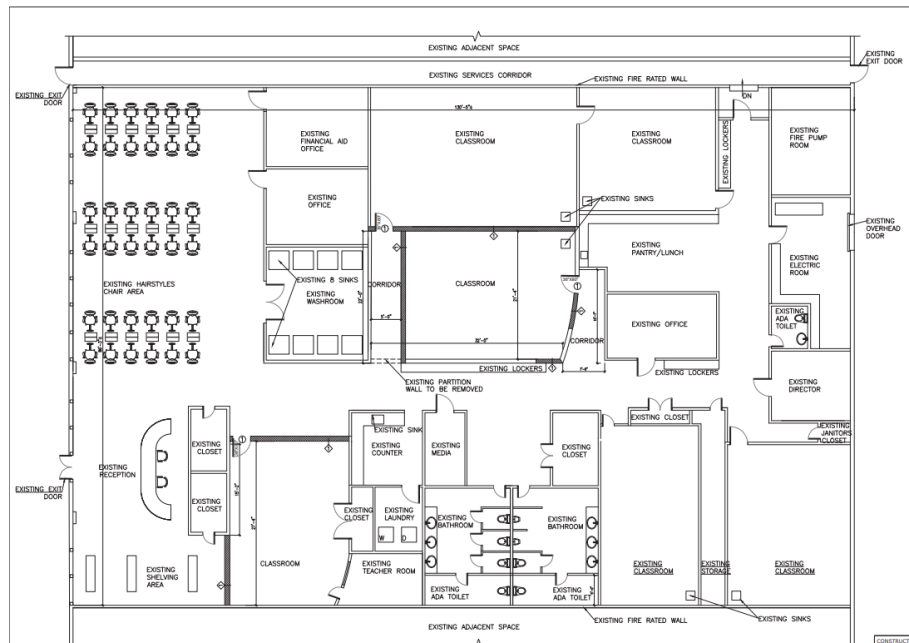
## Content of a Timely Warning

The timely warning shall include information that would aid in the prevention of similar crimes and enable the members of the campus community to protect themselves. The body of the notification shall include, but not be limited to:

- A succinct description of the incident and/or type of crime including location, date and time of occurrence and reported offense;
- A physical description of the suspect including gender, age, height, weight, hair color, race and other distinguishing characteristics if available and accompanied by other description characteristics;
- A composite drawing of the suspect or photograph if available;
- A description to an apparent connection to previous incidents if applicable;
- Race of the victim, but only if there is an apparent bias motive;
- Sex of the victim, if relevant;
- Notice to the campus community to use caution and the provision of safety and/or crime prevention tips;
- Other relevant and pertinent information such as weapons and vehicles involved, if applicable.

## Status Updates

When appropriate, status updates as to the resolution and/or disposition of the crime /incident will be similarly disseminated and updated as soon as possible.



## SUBSTANCE ABUSE POLICY

The use of drugs by students can create conditions that are contrary to those deemed necessary for the maintenance of an optimal academic environment. Innovate Salon Academy affirms its responsibility to secure this optimal educational atmosphere by establishing the following policy:

The use, possession, or sale of alcohol, illegal drugs, or narcotics, and/or paraphernalia by a student will subject that individual to disciplinary action and legal prosecution under federal, state, or local statutes. The decision rendered shall be determined by the circumstances of the student's involvement. In addition, the presence of the odor of marijuana, and the possession of drug paraphernalia or any device used to ingest marijuana in The Academy may also subject students to internal disciplinary action.

At no time, is alcohol or drugs are allowed on Academy property or as any part of the school's activities.

The following actions will take place if the above referenced policy is not adhered to:

1. A mandatory meeting with Innovate Salon Academy's Director.
2. Parental notification if student is under 18
3. Contact to The Brick Township Police Department
4. Immediate Termination from the Academy

## **A. NEW JERSEY STATE DRUG LAWS**

According to the New Jersey Code of Criminal Justice pertaining to controlled substances, students should be aware of the following:

1. It is unlawful for any person, knowingly or purposely, to manufacture, distribute or dispense, possess or have under his/her control with the intent to manufacture, distribute or dispense, a controlled dangerous substance or controlled substance analog.
2. It is unlawful for any person, knowingly or purposely, to obtain or to possess a controlled dangerous substance unless the substance was obtained directly by a valid prescription from a practitioner (physician, dentist, etc.)
3. Anyone convicted of distributing a controlled substance to a person under age 18 will be subject to twice the term of imprisonment, fine, and penalty.
4. New Jersey law provides strict liability for drug-induced deaths. Even if the victim voluntarily takes the drug, the person who distributes or dispenses the controlled substance can be prosecuted for a homicide

## **B. NEW JERSEY STATE ALCOHOL LAWS**

1. No one under 21 years of age may purchase, possess, or consume alcoholic beverages.
2. Transportation of open alcoholic beverage containers in any kind of vehicle on or off campus is a violation of state law. The transportation of alcoholic beverages by persons under 21 on campus is strictly prohibited. No person, regardless of age, may consume alcoholic beverages in public areas of the campus

## **C. DRUG LAWS AND TITLE IV ELIGIBILITY**

**If a student violates these policies and is at danger of losing their eligibility for Title IV funding, they will be notified in writing in a timely manner.**

### **§ 668.40 Conviction for possession or sale of illegal drugs.**

(a)

- (1) A student is ineligible to receive title IV, HEA program funds, for the period described in [paragraph \(b\)](#) of this section, if the student has been convicted of an offense under any Federal or State law involving the possession or sale of illegal drugs for conduct that occurred during a period of enrollment for which the student was receiving title IV, HEA program funds. However, the student may regain eligibility before that time period expires under the conditions described in [paragraph \(c\)](#) of this section.
- (2) For purposes of this section, a conviction means only a conviction that is on a student's record. A conviction that was reversed, set aside, or removed from the student's record is not relevant for purposes of this section, nor is a determination or adjudication arising out of a juvenile proceeding.
- (3) For purposes of this section, an illegal drug is a controlled substance as defined by section 102(6) of the Controlled Substances Act ( [21 U.S.C. 801\(6\)](#)), and does not include alcohol or tobacco.

(b)

- (1)*Possession*. Except as provided in [paragraph \(c\)](#) of this section, if a student has been convicted -
  - (i) Only one time for possession of illegal drugs, the student is ineligible to receive title IV, HEA program funds for one year after the date of conviction;
  - (ii) Two times for possession of illegal drugs, the student is ineligible to receive title IV, HEA program funds for two years after the date of the second conviction; or
  - (iii) Three or more times for possession of illegal drugs, the student is ineligible to receive title IV, HEA program funds for an indefinite period after the date of the third conviction.
- (2)*Sale*. Except as provided in [paragraph \(c\)](#) of this section, if a student has been convicted -
  - (i) Only one time for sale of illegal drugs, the student is ineligible to receive title IV, HEA program funds for two years after the date of conviction; or
  - (ii) Two or more times for sale of illegal drugs, the student is ineligible to receive Title IV, HEA program funds for an indefinite period after the date of the second conviction.

(c)

If a student successfully completes a drug rehabilitation program described in [paragraph \(d\)](#) of this section after the student's most recent drug conviction, the student regains eligibility on the date the student successfully completes the program.

(d)

A drug rehabilitation program referred to in [paragraph \(c\)](#) of this section is one which -

- (1) Includes at least two unannounced drug tests; and
- (2) (i) Has received or is qualified to receive funds directly or indirectly under a Federal, State, or local government program;
- (ii) Is administered or recognized by a Federal, State, or local government agency or court;
- (iii) Has received or is qualified to receive payment directly or indirectly from a Federally- or State-licensed insurance company; or
- (iv) Is administered or recognized by a Federally- or State-licensed hospital, health clinic or medical doctor.

(Authority: [20 U.S.C. 1091\(r\)](#))

[ [64 FR 57358, Oct. 22, 1999, as amended at 71 FR 45696, Aug. 9, 2006](#)]

#### D. HEALTH RISKS

**Marijuana** - distortion of time perception, increased heart rate, dilation of the blood vessels, and loss of short-term memory. Visual perception and psychomotor skills are also decreased which have adverse effects on driving ability. The effects of long-term use include loss of motivation, chronic bronchitis, decreased lung capacity, and an increased risk of lung cancer. In men, marijuana use can result in reduced levels of testosterone.

**Cocaine** - Short-term effects include elevated blood pressure, nervousness, and hyperactivity. Long-term effects include insomnia, malnutrition, and acute psychosis.

**Depressants** - Suppress the central nervous system enough to cause death. Slower response times, loss of rational judgment, decreased coordination, and loss of motor skills.

**Hallucinogens** - Dreamlike perceptions and/or panic reactions that produce horrifying perceptions.

**Narcotic Analgesics** - Physical dependence in a relatively short period of time. A narcotic overdose can result in death.

**Steroids** - Psychological dependence, increased anger, aggression, depression, and will stunt growth in adolescents who have not attained their full height.

#### E. FEDERAL TRAFFICKING PENALTIES

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

			mixture	<b>Offenses:</b> Life imprisonment. Fine of not more than \$20 million if an individual, \$75 million if not an individual.
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Substance/Quantity	Penalty
Any Amount Of Other Schedule I & II Substances	<b>First Offense:</b> Not more than 20 yrs. If death or serious bodily injury, not less than 20 yrs. or more than Life. Fine \$1 million if an individual, \$5 million if not an individual.  <b>Second Offense:</b> Not more than 30 yrs. If death or serious bodily injury, life imprisonment. Fine \$2 million if an individual, \$10 million if not an individual.
Any Drug Product Containing Gamma Hydroxybutyric Acid	
Flunitrazepam (Schedule IV) 1 Gram or less	
Any Amount Of Other Schedule III Drugs	<b>First Offense:</b> Not more than 10 yrs. If death or serious bodily injury, not more than 15 yrs. Fine not more than \$500,000 if an individual, \$2.5 million if not an individual.  <b>Second Offense:</b> Not more than 20 yrs. If death or serious injury, not more than 30 yrs. Fine not more than \$1 million if an individual, \$5 million if not an individual.
Any Amount Of All Other Schedule IV Drugs (other than one gram or more of Flunitrazepam)	<b>First Offense:</b> Not more than 5 yrs. Fine not more than \$250,000 if an individual, \$1 million if not an individual.  <b>Second Offense:</b> Not more than 10 yrs. Fine not more than \$500,000 if an individual, \$2 million if other than an individual.
Any Amount Of All Schedule V Drugs	<b>First Offense:</b> Not more than 1 yr. Fine not more than \$100,000 if an individual, \$250,000 if not an individual.  <b>Second Offense:</b> Not more than 4 yrs. Fine not more than \$200,000 if an individual, \$500,000 if not an individual.

Federal Trafficking Penalties for Marijuana, Hashish and Hashish Oil, Schedule I Substances	
Marijuana 1,000 kilograms or more marijuana mixture or 1,000 or more marijuana plants	<b>First Offense:</b> Not less than 10 yrs. or more than life. If death or serious bodily injury, not less than 20 yrs., or more than life. Fine not more than \$10 million if an individual, \$50 million if other than an individual.  <b>Second Offense:</b> Not less than 20 yrs. or more than life. If death or serious bodily injury, life imprisonment. Fine not more than \$20 million if an individual, \$75 million if other than an individual.
Marijuana 100 to 999 kilograms marijuana mixture or 100 to 999 marijuana plants	<b>First Offense:</b> Not less than 5 yrs. or more than 40 yrs. If death or serious bodily injury, not less than 20 yrs. or more than life. Fine not more than \$5 million if an individual, \$25 million if other than an individual.  <b>Second Offense:</b> Not less than 10 yrs. or more than life. If death or serious bodily injury, life imprisonment. Fine not more than \$8 million if an individual, \$50million if other than an individual.
Marijuana 50 to 99 kilograms marijuana mixture, 50 to 99 marijuana plants	<b>First Offense:</b> Not more than 20 yrs. If death or serious bodily injury, not less than 20 yrs. or more than life. Fine \$1 million if an individual, \$5 million if other than an individual.  <b>Second Offense:</b> Not more than 30 yrs. If death or serious bodily injury, life imprisonment. Fine \$2 million if an individual, \$10 million if other than an individual.
Hashish More than 10 kilograms	
Hashish Oil More than 1 kilogram	
Marijuana less than 50 kilograms marijuana (but does not include 50 or more marijuana plants regardless of weight)  1 to 49 marijuana plants	<b>First Offense:</b> Not more than 5 yrs. Fine not more than \$250,000, \$1 million if other than an individual.  <b>Second Offense:</b> Not more than 10 yrs. Fine \$500,000 if an individual, \$2 million if other than individual.

Hashish 10 kilograms or less	
Hashish Oil 1 kilogram or less	

## G. ACADEMY RESOURCES AND SERVICES

Alcoholism and Drug Abuse Council of Ocean County  
9 a.m. to 5 p.m., By Appointment (609) 597-9601

Ocean County Board of Health (Clinic) (732) 341-9700  
Women, Infants & Children (WIC)  
Immunization Clinic and Dental Clinic

Juvenile Conferences (609)-597-5715

Ocean County Security (609) 597-5892

Ocean County Board of Social Services (609) 978-2100

Substance Abuse Services Division of Public Health  
Stillwater Building  
201 South Shore Road  
Northfield, NJ 08201 (609)-645-5935

Ocean's Harbor House  
2445 Windsor Avenue  
P.O. Box 622  
Toms River, NJ 08753  
(732) 281-0822

Transitional Housing Program  
Department of Community Affairs  
1510 Hooper Avenue  
Toms River, NJ 08753  
(908) 255-0828

AA Meetings call 866.641.9190 to find a meeting  
Closest meeting place to the school is the Presbyterian Church at 111 Drum Point Road, Brick NJ 08723

## DRUG FREE CAMPUS

Innovate Salon Academy reviews its Drug-Free Academy Biennial Review Policy every **two** years and includes the effectiveness of sanctions imposed.

- All students receive the results of the biennial review during monthly celebration.
  - To ensure all students will receive a copy, students who are absent on the day of celebration will be handed a copy by their team coach upon the student's return.
    - Educators will take an attendance role call during this celebration to determine missing students.
- The Biennial Review summary is given to all staff, biennially, during a staff meeting.
  - Absent staff members will be given a copy upon their return.
  - If new staff joins after the biennial distribution, all drug related material will be given as part of the new hire program.

## Sexual Assault and Misconduct (Including Violence Against Women Act (VAWA))

- There are four primary categories of sexual assault: Dating Violence; Domestic Violence; Sexual Assault and Stalking. The primary definition for each of these categories is as follows:
- **Dating Violence** is violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with a victim.
  - A social relationship is defined as a relationship of a romantic or intimate nature and is based upon the reporting party or third party statements taking into consideration the length of the relationship, the type of the relationship and the frequency of the relationship.
- **Domestic Violence** is a felony or misdemeanor crime of violence committed by a current or former spouse or intimate partner; a person with whom the victim shares a child in common; a person cohabitating or has cohabitated with the victim as a spouse or intimate partner; a person similarly situated to a spouse under the domestic and family violence laws of the jurisdiction in which the crime of violence occurred; or any other person against an adult or youth victim who is protected from that person's acts under the domestic and family violence laws of the jurisdiction in which the crime of violence occurred. Domestic violence can be a single event or a pattern of behavior that includes, but is not limited to, sexual, or physical abuse.
- **Sexual Assault** is defined as an offense that meets the definition of rape, sodomy, and sexual assault with an object, fondling, incest, or statutory rape as used in the FBI's UCR program included in Appendix A of Subpart D or Part 668.
- **Stalking** is defined as engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for his or her safety or safety of others or suffer substantial emotional distress. Course of conduct is defined as engaging in 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. A reasonable person is defined as someone reasonable under similar circumstances and with similar identities to the victim. Substantial emotional distress is defined as significant mental suffering or anguish that may, but does not necessarily require medical or other professional treatment or counseling.
- Definitions of the following sexual misconduct/VAWA related offenses are according to local jurisdiction governing Innovate Salon Academy, Brick, NJ.
- The Academy prohibits all sexual misconduct and related VAWA offenses: crimes of dating violence, domestic violence, sexual assault, and stalking, as those terms are defined in the final regulations of VAWA or the definitions of these terms in the applicable jurisdiction.

### Consent as defined by local jurisdiction in reference to sexual activity:

- The affirmative, unambiguous, and voluntary agreement to engage in a specific sexual activity during a sexual encounter. Consent cannot be given by an individual who is asleep, or mentally or physically incapacitated either through the effect of drugs or alcohol or for any other reason; or is under duress, threat, coercion, or force, or inferred under circumstances in which consent is not clear, including but not limited to the absence of "no" or "stop" or the existence of a prior or current relationship or sexual activity.

### Bystander Intervention as defined by local jurisdiction:

- Safe and positive steps a bystander may take to prevent harm or intervene when there is a risk of domestic violence, dating violence, sexual assault, or stalking against another person could include, but is not limited to:
  - Understanding institutional structures and cultural conditions that facilitate violence; Information about recognizing situations of potential harm, overcoming barriers to intervening, identifying safe and effective intervention options, and taking action, such as reporting incidents to appropriate authorities, information on how to recognize warning signs of abusive behavior in order to mitigate the likelihood of perpetration, victimization, or bystander inaction.
- *The Academy defines the following based on the local jurisdiction in which The Academy is located:*
  - *Awareness programs are defined as:* the **state** or ability to perceive, to feel, or to be **conscious** of events, **objects**, thoughts, emotions, or sensory **patterns**. In this level of consciousness, sense data can be confirmed by an observer without necessarily implying **understanding**.

*Ongoing prevention and awareness campaigns are defined as: campaigns that are sustained over time focusing on increasing awareness or understanding of topics relevant to SA, DV and stalking prevention. These programs will occur at different levels throughout the institution (i.e. faculty, athletics, incoming students) and will utilize a range of strategies. Ongoing awareness and prevention campaigns may include information about what constitutes sexual assault, dating violence/intimate partner abuse, and stalking, changing social norms, promoting recognition of perpetrator tactics, enhancing understanding of consent, and advancing prosocial behaviors of individuals and communities.*

*Primary prevention programs are defined as: The term **primary prevention** refers to programming, initiatives and strategies intended to stop domestic violence, dating violence, sexual assault, or stalking before it occurs to prevent initial perpetration or victimization through the promotion of positive and healthy behaviors and beliefs. Efforts to change behavior and social norms, and promote healthy relationships, healthy sexuality and egalitarian gender roles, or efforts to understand risk factors and protective factors for bystander inaction and change social norms around bystander inaction are all examples of primary prevention.*

- *Risk Reduction is defined as: options designed to decrease perpetration and bystander inaction and to increase empowerment for victims in order to promote safety and to help individuals and communities address conditions that facilitate violence.*

### Warning Signs of Abusive Behavior

- Information regarding risk reduction by recognizing warning signs of abusive behavior can be found at: <http://www.helpguide.org/articles/abuse/domestic-violence-and-abuse.htm>
- The definition of "Rape" as defined by the FBI UCR Summary Reporting Systems is as follows: "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."



## Unfounded Crime Data

- The number of “unfounded” crime data that is withheld from The Academy’s crime statistics during the most recent three years will be reported to the Department through its annual security reporting (Campus Crime Report).
  - Institutions may only exclude a reported crime from its upcoming annual security report or remove a reported crime from its previously reported statistics only after a full investigation. Only sworn or commissioned law enforcement personnel (this does not include a district attorney who is sworn or commissioned) can make a formal determination that the report was false or baseless when made and that the crime report was therefore “unfounded”. Crime reports can be properly determined to be false only if the evidence from the complete and thorough investigation establishes that the crime reported was not, in fact, completed or attempted in any manner. Crime reports can only be determined to be baseless if the allegations reported did not meet the elements of the offense or were improperly classified as crimes in the first place.
- A case cannot be designate “unfounded” if:
  - No investigation was conducted or the investigation was not completed
  - Merely because the investigation failed to prove that the crime occurred; this would be an inconclusive or unsubstantiated investigation.
  - Recovery of stolen property.
  - Low value of stolen property.
  - Refusal of victim to cooperate with law enforcement.
  - The prosecution or the failure to make an arrest.
  - The findings of a coroner, court, jury (either grand or petit) or prosecutor do not “unfound” crime reports of offenses or attempts.
- If a crime is not included in the Clery Act statistics because it was “unfounded”, The Academy will still maintain accurate documentation of reported crime and the basis for “unfounding” the crime.
  - Documentation must demonstrate that the determination to “unfound” the crime was based on the results of the law enforcement investigation and evidence.
- In conclusion, all reports of crimes must be included in the statistics, except in the rare case that crime report is “unfounded”.

## Sexual Offense

- If a sexual misconduct/sexual offense has occurred, please notify a staff member as soon as possible.
- Innovate Salon Academy will do everything possible to assist in this serious matter.

### Rights of the Victim/Accused:

- When a student or employee reports to an Academy Staff member that the student or employee has been a victim of domestic violence, dating violence, sexual assault, or stalking, whether the offense occurred on or off campus, The Academy will provide the student or employee a written explanation of the student’s or employee’s rights and options.
- Safeguarding the victim and accused identity is a priority.
- Written notification regarding the following will be provided to the victim regardless of whether the victim chooses to report the crime to local law enforcement:
  - Local counseling agencies, including but not limited to, health, mental health, victim advocacy, and/or legal assistance.

Area counselor/facilities that counsel victims regarding sexual assault / mental health include:

Bright Harbor Healthcare

160 US 9

Bayville, New Jersey 08721

(732) 349-5550

- Options for and available assistance in, changing academic schedules (i.e., allowing the victim to take a leave of absence or enroll in a later program, etc. if the change is requested by the victim and the change is reasonably available), living arrangements, or transportation if requested by the victim and such accommodations are reasonably available.
- National Hotlines available to counsel sexually assaulted students such as but not limited to:
  - National Sexual Assault Hotline at 1-800-656-4673
  - Love is Respect Hotline at 1-866-331-9474 or text “campus” to 22522
  - National Domestic Violence Hotline at 1-800-799-7233
- Time is of the essence for evidence collection and preservation.
  - Ideally, a victim of a sexual assault should not wash, douche, use the toilet, or change clothing prior to a medical exam.
- The preservation of evidence is of the utmost importance to assist in proving the alleged criminal offense or obtaining a protective order; therefore, all evidence will be protected and forthcoming during an investigation.
- Alleged offenses can be reported to any of the administrative / educational staff within The Academy if the Compliance Officer is not readily available.
- The victim has the right to decline Academy assistance, but upon request, a staff member will assist in notifying local law enforcement agencies.
- The victim has the right to contact or decline notification to local law enforcement.
- If applicable, the rights of the victim and The Academy’s responsibilities regarding orders of protection, no contact orders, restraining orders, or similar lawful orders issued by a criminal, civil, or tribal court will be followed.
- Filing a police report will not obligate the victim to prosecute, nor will it subject the victim to judgment from others.
- If a sex offense happens where both the accused and the accuser attend Innovate Salon Academy, the accused and the accuser are entitled to the same opportunity to have others present during an Academy disciplinary proceeding, including the opportunity to be accompanied to any related meeting or proceeding by an advisor of their choice.
- The accused and accuser are given timely notice of meetings at which one or the other or both may be present.

- The accuser, the accused, and appropriate officials will be given timely and equal access to information that will be used during informal and formal disciplinary meetings and hearings.
- Both the accuser and the accused shall be simultaneously informed, in writing, of:
  - The outcome of The Academy disciplinary proceeding and sanctions imposed against the accused.
  - The Academy will allow the accused / accuser to appeal the result of The Academy disciplinary proceedings.
  - Any change in the results that occur prior to the time the results become final.
  - When the results become final.
- Appeal proceedings are as follows:
  - Appeals will be reviewed on a case-by-case basis.
  - Appeal must be provided in writing to owner(s) of The Academy within 10 business days of the date the final outcome was delivered to the student.
  - Owners will review the student's appeal and will respond to the appeal within 14 business days.
  - All appeal determinations are final.
- The appeal decision and all appeal related documents will be placed in the student's file.

### **Disciplinary Procedures**

- The Academy disciplinary proceedings are identified as all activities related to non-criminal resolution of an institutional disciplinary complaint including but not limited to, fact-finding investigations, formal or informal meetings and hearings.
- Proceeding does not include communications and meetings between officials and victims concerning accommodations or protective measures to provide to a victim.
- The student or employee may file a disciplinary complaint by: Writing a letter to one of the owners of the Academy, that should include dates, times, all names of people involved with an explanation, in as much detail as possible, along with any supporting documentation.
- The Academy will follow the below criterion to determine which type of disciplinary proceeding to implement based on the circumstances of an allegation of:
  - Dating Violence: Police will be notified/help center information will be given
  - Domestic Violence: Police will be notified/help center information will be given
  - Sexual Assault: Police will be notified/help center information will be given
  - Stalking: Police will be notified/help center information will be given
- The standard of evidence that will be used during The Academy conduct proceeding arising from the report will include: The letter from the accuser/accused with any supporting documentation.
- The Academy will provide prompt, fair, and an impartial investigation / disciplinary proceeding with the ultimate goal of a final consequence / result.
- "Proceeding" is defined as an orderly process in which participants or their representatives are able to present evidence in support of their claims and to argue in favor of particular interpretations of the law in which a fact finder makes a determination of the factual and legal issues.
- "Result" is defined as the final consequence of a sequence (ordered list) of actions or events expressed qualitatively or quantitatively. Possible results include advantage, disadvantage, gain, injury, loss, value and victory. There may be a range of possible outcomes associated with an event depending on the point of view, historical distance or relevance. Reaching no result can mean that actions are inefficient, ineffective, meaningless or flawed.
- No retaliating, intimidating, threatening, coercing, or otherwise discriminatory actions by any employee against any individual for exercising their rights or responsibilities regarding sexual misconduct / assault.
- Safeguarding the identity of the victim and the accused will be ensured by the following Academy procedures: All meetings will be held behind closed doors. All documentation will be kept in a locked filing cabinet. Only people that are involved or need to be involved will be in attendance at any meeting.
- The investigation will be conducted by officials who receive annual training on issues related to domestic violence, dating violence, sexual assault, and stalking regarding how to conduct an investigation and impartial hearing process that protects the safety of victims and promotes accountability.
- Officials who conduct the proceedings may not have a conflict of interest or bias for or against the accuser or the accused.
- The Academy anticipated timeline for the decision-making process and disciplinary proceedings would be 14 days.

### **Sanctions**

- Sanctions that may be imposed following the result of The Academy disciplinary proceedings for an allegation of any sexual offense include but may not be limited to:
  - A dismissal from The Academy following a final determination of said proceedings surrounding sexual assault / misconduct or any VAWA offenses, including but not limited to, rape, acquaintance rape, or other forcible or non-forcible sex offenses, dating violence, domestic violence, sexual assault or stalking.

### **Protective Measures**

- The range of protective measures offered to a student or employee following an allegation of dating violence, domestic violence, sexual assault, or stalking includes but may not be limited to:
  - Filing a formal complaint with the local Police Dept.

### **Additional VAWA Information**

- **Compliance with VAWA provisions does not constitute a violation of section 444 of the General Education Provisions Act (20 U.S.C.1232g), commonly known as the Family Educational Rights and Privacy Act of 1974 (FERPA).**
- The Academy will notify proper authorities regarding any reasonable suspicion of an Academy student being a victim of sex trafficking.
- The Academy will recommend culturally appropriate victim services/shelters to assist women in the event of a domestic violence, dating violence, sexual assault, or stalking, including electronic stalking.

- If a minor or a person with a legally appointed guardian is permitted by law to receive victim services without the parent's or guardians consent, the minor or person with a guardian may release information without additional consent.

#### **Information for Crime Victims about Disciplinary Proceedings**

- Information will be disclosed upon written request, to any alleged victim of any crime of violence or forcible / non-forcible sex offense, regarding the results of any disciplinary proceedings conducted by The Academy against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased as a result of the crime or offense, the information shall be provided upon request, to the next of kin of the alleged victim.

#### **Primary Prevention Programs**

- Primary prevention and awareness programs provided by The Academy will include the statements: *The Academy prohibits the crimes of dating violence, domestic violence, sexual assault, and stalking, as those terms are defined in the final VAWA regulations; the definitions of these terms in the applicable jurisdiction; the definition of "consent", in reference to sexual activity, in the applicable jurisdiction; a description of safe and positive options for bystander intervention information on risk reduction; and information on The Academy's policies and procedures after a sex offense occurs.*
- Primary Prevention Program is defined as programming, initiatives and strategies informed by research or assessed for value, effectiveness or outcome that are intended to stop dating violence, domestic violence, sexual assault and stalking before they occur, through the promotion of positive and healthy behaviors that foster healthy, mutually respectful relationships and sexuality, encourages safe bystander intervention and social norms in health and safe directions.
- The Primary Prevention Program(s) focus on changing the social norms and stereotypes that create conditions in which sexual violence occurs, are tailored and inclusive to the student body and staff community, use a range of strategies throughout The Academy to convey the Primary Prevention Program requirements and are sustainable over time.
- An annual educational program designed to prevent and promote the awareness of rape, acquaintance rape, domestic violence, dating violence, sexual assault, and stalking for the purposes of primary prevention and awareness for incoming students, new employees, current students and current employees includes:
  - Educators will visit <https://www.rainn.org/get-information/sexual-assault-prevention> with their class.
  - Students will be grouped and assigned a section of the site to research and note important facts.
  - Student groups will present and then have a discussion on their findings.
- The program is video taped so all new students and staff may have access to this preventative education.
- If a student or staff member wishes to learn more about the prevention of sexual assault, contact the local Police Department at (908) 755-0700.
- Individuals wishing to learn additional information about registered sex offenders may go to <http://www.familywatchdog.us> or check website information for the Township of Brick.

#### **Ongoing Prevention Awareness Programs**

- The Academy will provide ongoing prevention and awareness campaigns for their students and staff that is concurrent with the primary prevention and awareness programs presented to staff and students from outside entities.
- The purpose of the ongoing prevention campaigns is to increase understanding of topics relevant to and skills for addressing: dating violence, domestic violence, sexual assault and stalking. These programs are tailored to meet the needs of staff and students so they are culturally relevant.
  - A description of the ongoing prevention and awareness program(s) must be placed here:
  - During one on one monthly coaching sessions, students will be asked to visit <https://www.rainn.org/get-information/sexual-assault-prevention> and can follow up with educators if they have any questions, concerns, or complaints.

#### **TITLE IX COORDINATOR / COMPLIANCE OFFICER:**

- The Academy does not discriminate on the basis of sex in education programs or activities it operates and the Academy is required by Title IX not to discriminate in such a manner.
- Questions regarding Title IX may be referred to The Academy's Title IX Coordinator / Compliance Officer or to the Office of Civil Rights.
- The Title IX Coordinator / Compliance Officer of The Academy is Donna Hernandez and can be reached at The Academy by phone at 800-209-9982 or by email at [titleixcoordinator@innovatesalonacademy.com](mailto:titleixcoordinator@innovatesalonacademy.com).
- If any part of a school, district, vocational school, or college receives Federal funds for any purpose, all of the operations of the school are covered by Title IX.
- *Title IX protects employees, students and applicants for admission and employment, and other persons from all forms of sexual discrimination, including discrimination based on gender identity or failure to conform to stereotypical notions of masculinity and femininity.*
- All students (as well as other persons) at recipient institutions are protected by Title IX-regardless of their sex, sexual orientation, gender identity, part or full time status, disability, race, or national origin-in all aspects of a recipient's educational programs and activities.
- The Title IX Coordinator / Compliance Officer has the primary responsibility for coordinating The Academy's efforts to comply with and carry out its responsibilities under Title IX, which prohibits sex discrimination in all the operations of The Academy, including a nondiscriminatory environment and prohibits retaliation for the purpose of interfering with any right or privilege secured by Title IX.
  - The Title IX Coordinator / Compliance Officer plays a crucial role in helping The Academy's staff, employees and students understand their legal rights and responsibilities under Title IX including, but not limited to:
    - Ensuring that all policies and procedures meet Title IX requirements.
    - Conducts regular training for staff outlining their rights and obligations for Title IX, including how to appropriately respond to reports of sexual misconduct, how to report and to the extent to which counselors and advocates may keep a report confidential.
    - Conducts regular training for students to help them understand Title IX rights with regards to sexual misconduct.
- The Academy Title IX Coordinator / Compliance Officer is responsible for overseeing investigations / all monitoring of Title IX requirements.
- Under Title IX regulations, sexual misconduct against a student includes sexual harassment, sexual assault, rape and sexual exploitation.
  - The Title IX Coordinator / Compliance Officer oversees The Academy's response to reports and complaints that involve possible sexual discrimination.
  - The Title IX Coordinator / Compliance Officer monitors the outcomes and looks for developing patterns across The Academy entire student population.
- The Academy's Title IX Coordinator / Compliance Officer is also responsible to ensure all Academy Policies and Procedures are implemented, including but not limited to all aspects of Campus Security and Safety, to provide an environment in which students are protected and void of sexual exploitation and discrimination.
- A student may contact the Title IX Coordinator / Compliance Officer to:
  - Seek out information / training regarding a student's rights and courses of action under the Title IX regulation;
  - File a complaint or report of sexual discrimination / misconduct
  - Notify The Academy of an incident / policy / procedure that may raise Title IX concerns;
  - Seek confidential information or available supporting resources relating to sexual misconduct / discrimination;
  - Ask questions regarding The Academy's policies and procedures related to sexual misconduct / discrimination.
- If any Title IX Coordinator / Compliance Officer conflict of interest occurs regarding a policy, procedure, or incident, the student may contact another member of The Academy to express their concern, or report an incident.
- Any inquires or complaints that involve potential Title IX violations, can also be referred to the U.S. Department of Education Office for Civil Rights, which can be reached at The Academy's Dept. of Education Regional Office, 646-428-3906, 32 Old Slip, 25th Floor New York, NY 10005 or can be referred to the *Educational Opportunities Section* of the Civil Rights Division of the U.S. Department of Justice at <http://www.justice.gov/crt/complaint/#three>
- Additional information regarding Title IX requirements may be found in the Student Handbook under the Campus Security Disclosure Information.

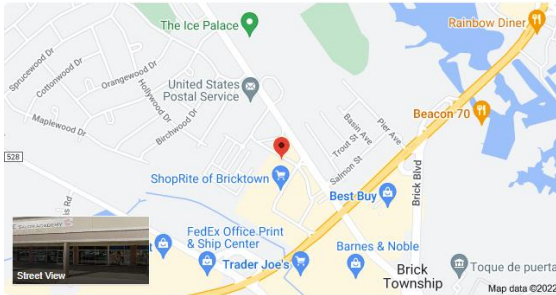
# Campus Crime Statistics Act (Clery Act) Policy

The Jeanne Clery Disclosure of Campus Security Policy & Campus Crime Statistics Act (Clery Act) requires Innovate Salon Academy to collect, classify, count and disseminate crime report crime statistics in an Annual Security Report (ASR) by October 1<sup>st</sup> of each year to all currently enrolled students and employees. Innovate Salon Academy must also provide the ASR to any prospective employee or student upon request.

The Clery Act requires Innovate Salon Academy to disclose statistics for reported crimes based on: where the crimes occurred; to whom the crimes were reported; the types of crimes that were reported; and the year in which the crimes were reported. These statistics are collected each year from the Brick Township police department and The Crime Report is prepared by Sean Sickles. Copies of this report may be requested in writing to The Office of Financial Aid.

## I. Clery Geography

Innovate Salon Academy must disclose statistics for reported Clery crimes that occur: (1) on-campus, (2) on public property within or immediately adjacent to the campus, and (3) in or on non campus buildings or property that Innovate Salon Academy owns or controls. As specified in the Clery Act, the following property descriptions are used to identify the location of crimes in and around Innovate Salon Academy's campus:



### A. On-Campus

On-campus property includes: (1) any building or property owned or controlled by an institution within the same reasonably contiguous geographic area and used by the institution in direct support of, or in a manner related to, the institution's educational purposes, including residence halls; and (2) any building or property that is within or reasonably contiguous to the area identified in Section A(1) of this definition, that is owned by the institution but controlled by another person, is frequently used by students, and supports institutional purposes (such as a food or other retail vendor).

### B. Non-Campus Buildings or Property

Non-campus buildings or property include: (1) any building or property owned or controlled by an officially recognized student organization that is officially recognized by the institution; or (2) any building or property owned or controlled by an institution that is used in direct support of, or in relation to, the institution's educational purposes, is frequently used by students, and is not within the same contiguous geographic area of the institution.

### C. Public Property

Public property includes all public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the institution's campus or immediately adjacent to and accessible from the campus.

## II. Definitions of Criminal Offenses

The Clery Act requires institutions to disclose three general categories of crime statistics. The Violence Against Women Reauthorization Act of 2013 (VAWA), amended the Clery Act to require institutions to disclose an additional fourth category of crime statistics. Pursuant to the Clery Act, definitions are to be used for reporting crimes in accordance with the *Federal Bureau of Investigation's Uniform Crime Reporting Program*. The definitions for murder, robbery, aggravated assault, burglary, motor vehicle theft, weapons: carrying, possessing, etc.; law violations; drug abuse violations; and liquor law violations are from the Federal Bureau of Investigation's (FBI's) *Uniform Crime Reporting Handbook (UCR)*. For sex offenses, definitions are excerpted from the FBI's *National Incident-Based Reporting System (NIBRS)* edition of the *UCR*. The definitions of larceny-theft (except motor vehicle theft), simple assault, intimidation, and destruction/damage/vandalism of property are from the *Hate Crime Data Collection Guidelines* of the FBI's *Uniform Crime Reporting Handbook*.

### A. Criminal Offenses

The following definitions are used to classify Clery Criminal Offenses:

1. **Criminal Homicide** - These offenses are separated into the following two categories:
  - a. **Murder/Non-Negligent Manslaughter** - The willful (non-negligent) killing of one human being by another.
  - b. **Negligent Manslaughter** - The killing of another person through gross negligence.
2. **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.
3. **Aggravated Assault** - An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault is usually 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 will result in serious personal injury if the crime were successfully completed.)
4. **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.
5. **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.)
6. **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.

7. **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.

a. **Forcible Sex Offenses:**

- i. 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.
- ii. 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.

b. **Non-Forcible Sex Offenses:**

- i. Incest - Non-forcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
- ii. Statutory Rape - Non-forcible sexual intercourse with a person who is under the statutory age of consent.

**B. Hate Crimes**

The second category of statistics that must be disclosed is hate crimes. A hate crime is a crime reported to local police agencies or to a campus security authority that manifests evidence that the victim was intentionally selected because of the perpetrator's bias against the victim. The categories of bias include the victim's actual or perceived race, religion, gender, gender identity, sexual orientation, ethnicity, national origin, and disability. For each hate crime recorded, an institution must identify the category of bias that motivated the crime.

The following are the categories of hate crime which are required to be reported:

1. **Criminal Homicide**

- a. Murder and Non-Negligent Manslaughter
- b. Negligent Manslaughter

2. **Sex Offenses**

- a. Rape
- b. Fondling
- c. Incest
- d. Statutory Rape

3. **Robbery**

4. **Aggravated Assault**

5. **Burglary**

6. **Motor Vehicle Theft**

7. **Arson**

8. **Larceny-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 included.

9. **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.

10. **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.

11. **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.

**C. Arrests and Disciplinary Referrals for Violation of Weapons, Drug and Liquor Laws**

The third category of crime statistics that Universities must disclose are the number of arrests and the number of persons referred for disciplinary actions for the following law violations:

1. **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.

2. **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.

3. **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.

**D. Violence Against Women Reauthorization Act of 2013 (VAWA) Offenses**

The fourth category of crime statistics that Universities must disclose includes the following:

1. **Dating Violence** - Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim.

a. 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.

b. For purposes of this definition -

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

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

## **2. Domestic Violence -**

a. 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 who 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.

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

## **3. Stalking -**

a. Engaging in a course of conduct directed at a specific person that would cause a reasonable person to:

- i. fear for the person's safety or the safety of others; or
- ii. suffer substantial emotional distress.

b. For the purpose of this definition -

- i. *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 other means follows, monitors, observes, surveils, threatens, or communicates to or about, a person, or interferes with a person's property.
- ii. *Substantial emotional distress* means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling.
- iii. *Reasonable person* means a reasonable person under similar circumstances and with similar identities to the victim.

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

## **III. Preparation and Disclosure of Crime Statistics**

The Innovate Salon Academy Office of Financial Aid is responsible for collecting and reporting the annual crime statistics from local police agencies. A hard copy of the report is available upon request to the Innovate Salon Academy Office of Financial Aid. The crime statistics are also submitted to the United States Department of Education on an annual basis.

The Innovate Salon Academy annually sends a request to local law enforcement agencies that has jurisdiction over the Academy's Clery geography. Clery reporting covers the preceding calendar year, January 1 to December 31.

## **IV. Campus Security Authorities**

### **A. Definition**

The Clery Act regulations define the following persons as campus security authorities:

1. A member of a campus police department or a campus security department of an institution.
2. Any individual or individuals who have responsibility for campus security but who does not constitute a campus police department or a campus security department (e.g., an individual who is responsible for monitoring the entrance into institutional property).
3. Any individual or organization specified in an institution's statement of campus security policy as an individual or organization to which students and employees should report criminal offenses.
4. An official of an institution who has significant responsibility for student and student activities.

## **Registered Sex Offenders**

In accordance with the federal Campus Sex Crimes Prevention Act (CSCPA) notice must be given of registered sex offenders to institutions of higher education if the offender is employed, carries on a vocation, or is a student at the institution.

New Jersey law authorizes the Division of State Police to make available to the public over the Internet information about certain sex offenders required to register under Megan's Law. The sex offender Internet registry law can be found in the New Jersey Code at 2C:7-12 to -19.

Information regarding registered sex offenders residing within a specific geographic location can be accessed via the NJ State Police website:

<http://www.njsp.org/sex-offender-registry/index.shtml>



# CRIME STATISTICS

CRIMINAL OFFENSES			
Primary Crimes (As defined by FBI's UCR Program, "Summary Reporting System User Manual", (SRS))			
OFFENSE	Year	Geographic Location	
		On Campus Property	Public Property/ Non Campus
MURDER / NON-NEGLIGENT MANSLAUGHTER	2022	0	0
	2023	0	0
	2024	0	0
MANSLAUGHTER BY NEGLIGENCE	2022	0	0
	2023	0	0
	2024	0	0
RAPE	2022	0	0
	2023	0	0
	2024	0	0
FONDLING	2022	0	0
	2023	0	0
	2024	0	0
INCEST	2022	0	0
	2023	0	0
	2024	0	0
STATUTORY RAPE	2022	0	0
	2023	0	0
	2024	0	0
ROBBERY	2022	0	0
	2023	0	0
	2024	0	0
AGGRAVATED ASSAULT	2022	0	0
	2023	0	0
	2024	0	0

<b>BURGLARY</b> Where there is evidence of unlawful entry which may be forcible or non-forcible Unlawful entry must be of a structure/four walls, roof and door There is evidence that entry was made in order to commit a felony or theft	2022	0	0
	2023	0	0
	2024	0	0
<b>MOTOR VEHICLE THEFT</b>	2022	0	0
	2023	0	0
	2024	0	0
<b>ARSON</b>	2022	0	0
	2023	0	0
	2024	0	0

<b>VAWA OFFENSES</b> Violence Against Women Act (VAWA) (Sexual Assault is included under "Criminal Offenses-Primary Crimes")			
OFFENSE	Year	Geographic Location	
		On Campus Property	Public Property/ Non Campus
<b>DOMESTIC VIOLENCE</b>	2022	0	0
	2023	0	0
	2024	0	0
<b>DATING VIOLENCE</b>	2022	0	0
	2023	0	0
	2024	0	0
<b>STALKING</b>	2022	0	0
	2023	0	0
	2024	0	0

<b>ARRESTS AND DISCIPLINARY REFERRALS</b>
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OFFENSE	Year	Geographic Location	
		On Campus Property	Public Property/ Non Campus
ARRESTS: WEAPONS: CARRYING, POSSESSING, ETC.	2022	0	0
	2023	0	0
	2024	0	0
DISCIPLINARY REFERRALS: WEAPONS: CARRYING, POSSESSING, ETC	2022	0	0
	2023	0	0
	2024	0	0
ARRESTS: DRUG ABUSE VIOLATIONS	2022	0	0
	2023	0	0
	2024	0	0
DISCIPLINARY REFERRALS: DRUG ABUSE VIOLATIONS	2022	0	0
	2023	0	2
	2024	0	0
ARRESTS: LIQUOR LAW VIOLATIONS	2022	0	0
	2023	0	0
	2024	0	0
DISCIPLINARY REFERRALS: LIQUOR LAW VIOLATIONS	2022	0	0
	2023	0	0
	2024	0	0

## HATE CRIMES

Reported statistics under **Criminal Offenses** by category of prejudice-hate crime or bias. (A Criminal Offense that is motivated by a Hate Crime must be counted in **both** sections):

There were no Hate Crimes reported for years 2022, 2023 or 2024

## UNFOUNDED CRIMES

There were no Unfounded Crimes reported for 2022, 2023 or 2024

### Distribution of the Annual Security Report

The annual security report is distributed to all currently enrolled students (including those attending less than full-time and those not enrolled in Title IV programs or courses) and all employees by Oct. 1 each year. Distribution is done via email. The Academy also provides a hard copy of the report to any prospective student or prospective employee upon request. *A prospective student is defined as an individual who has contacted an eligible institution requesting information about admission to that institution.*

*A prospective employee is defined as an individual who has contacted an eligible institution requesting information concerning employment with that institution.*

Annual Security emails are sent on or before October 1st each year. It is sent as individual notice to each student and employee. The email includes a statement of the report's availability, a list and brief description of the information contained within the report and a link to the exact URL at which the report is posted.

A statement that the Academy will provide a paper copy of the annual security report upon request.. The annual security report is provided free of charge to the campus community.

### Providing the Annual Security Report to Prospective Students and Employees

The Academy providing prospective students and prospective employees with a notice containing:

- A statement of the report's availability
- A description of its contents
- The opportunity to request a copy

This information is provided this prospective students and prospective employees along with other information The Academy provides to them upon their initial inquiry for program or employment information.

If revisions are made to the annual security report, The Academy will redistribute the annual security report following the procedures for proper distribution. Notification to students and employees would also apply if the annual security report is revised and posted online.

### Retaining Records

The Academy retains the annual security report and all supporting records used in compiling the report for three years from the latest publication of the report to which they apply—in effect, seven years.

Records to be kept include, but are not limited to, the following:

- Copies of crime reports
- Records for arrests and referrals for disciplinary action
- Timely warning and emergency notification reports
- Documentation, such as letters to and from local police having to do with Clery Act compliance
- Copies of notices to students and employees about the availability of the annual security report.

Documents should be dated and ensure they are easily retrievable. Scanned paper documents for archival purposes are acceptable.