



THE INSTITUTE OF BEAUTY AND WELLNESS

2018 Annual Security Report

Each year prior to October 1, the Institute of Beauty and Wellness prepares an annual security report to comply with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act. The Clery Act (originally known as the Crime Awareness and Campus Security Act), signed in 1990, requires all colleges and universities that participate in federal financial aid programs to keep and disclose information about crime on and near their respective campuses.

The 2018 Annual Security Report includes institutional policies concerning campus security, crime log, emergency response and evacuation, drug and alcohol, sexual violence, and anti-harassment and discrimination.

The report provides statistics for the previous three calendar years – 2015 to 2017– on reported crimes that occurred on-campus, which encompasses the lower level, second floor, third, floor, and fourth floor of 327 East Saint Paul Avenue, Milwaukee, WI 53202. The campus may also be entered from 341 North Milwaukee Street, Milwaukee, WI 53202 with an identification badge. Neroli Salon and Spa, located on the first floor of 327 East Saint Paul Avenue, as well as, the corporate offices of The Institute of Beauty and Wellness and Neroli Salon and Spa located on the fifth floor of 327 East Saint Paul Avenue are included in the Institute of Beauty and Wellness' on-campus property.

The report also includes documentation of a request to the Milwaukee Police Department for more information in finalizing the 2018 Annual Security Report and their response.

The Admissions Department will notify prospective students where to obtain this report. All prospective staff members may obtain a copy of this report from the Human Resources Department. Each year, the school will e-mail enrolled students and staff, the web site address to access this report. During the review of the Student Handbook (usually on the first day of a student's program), students are provided with information regarding access to this report. This report is found on the school's website at www.ibw.edu. A printed copy of the report can be found in the school's student break room, and requested by calling the Admissions Department at 414.319.7576 or by e-mail to admissions@ibw.edu

Campus Security Policy

To provide a safe and secure environment for students, staff and guests, The Institute of Beauty and Wellness has adopted the following procedures.

1. Campus programs which inform students and staff about being responsible for their own safety and the security of others include:
 - a. Emergency procedures presented during orientation
 - b. Student Handbook is reviewed
 - c. Emergency procedures presented during student assemblies

2. Only certain staff members are authorized to have keys to the building. Students and staff utilize a key card for a locked entrance. Access to the building is only given to students during their normal class time. Any students seeking access outside their normal class time must have prior authorization from a staff member. Alarm systems, outdoor lighting, security cameras, and telephones are integral parts of the campus security system. Facility security issues should be reported to a staff member immediately.

3. The Institute of Beauty and Wellness encourages students and staff to be responsible for their own security and security of others. If someone has concerns about walking from the building to their car after dark, he/she should walk in a group or request that a staff member provide escort service to walk you to your car.

3. Upon observing or involvement in any type of crime, or if there is an emergency occurring on the campus of the Institute of Beauty and Wellness, it should be reported immediately to a staff member. If a student wants to report a crime on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics, contact the school's Director, Kari Kennedy at 414-319-7572. For off campus, you may contact the Milwaukee Police Department at 414-933-4444 for non-emergencies. You should always dial 9-1-1 for emergency situations.

4. All incidents will be investigated by the school's Director, Kari Kennedy, and/or Owner, Susan Haise. Although, the Institute of Beauty and Wellness does not have a police or security department, it does refer violations of the law to law enforcement agencies.

5. In addition to this report, The Institute of Beauty and Wellness will provide a timely warning to students and staff of any occurrences of the following crimes that are reported to local police agencies and are considered to represent a serious or continuing threat to students and staff. Please note: the Institute of Beauty and Wellness is not required to provide timely warnings with respect to crimes reported to a pastoral or professional counselor. As soon as the Institute of Beauty and Wellness becomes aware of the crimes, students and staff will be notified through e-mail, the posting of flyers, in-class announcements, or other appropriate means. These crimes include: criminal homicide, forcible and non-forcible sex offences, robbery, aggravated assault, burglary, motor vehicle theft, arson, hate crimes including crimes involving bodily injury reported to local police agencies that show evidence of prejudice based on race, gender, religion, sexual orientation, ethnicity or disability, arrests for violations of liquor and drug law violations and illegal weapons possession, and persons not arrested but referred for disciplinary action for liquor, drug, and weapons law violations.

6. The Institute of Beauty and Wellness does not have on-campus or off-campus student housing facilities.

Crime Log

The school's Director and Title IX Coordinator maintain a combined log of all incidents of crime reported to them. An entry, an addition to an entry or a change in the disposition of a complaint must be recorded within two (2) business days of the reporting of the information to the school's Director and/or Title IX Coordinator.

A Crime Log form can be found at the end of this report for both the Institute of Beauty and Wellness and Aveda Institute Madison.

Emergency Response and Evacuation Procedures

The Institute of Beauty and Wellness will, without delay, and taking into account the safety of the community, determine the content of an emergency notification and initiate the campus emergency notification system, unless such notification will, in the professional judgment of campus security authorities, compromise efforts to assist victims or to contain, respond to, or otherwise mitigate an emergency.

IN CASE OF AN EMERGENCY

1. Emergency Evacuation Signs-These are posted outside of all elevator doors. All individuals in the building should use the east or west stairwell in case of an emergency evacuation. The elevator should not be used.
2. Safety Gate on east and west side-entrance to the basement-Purpose of these gates is to prevent someone during an emergency evacuation to accidentally go into the basement instead of outside per City of Milwaukee Building Code.
3. Fire Extinguishers: 2 fire extinguishers are located on the east and west side of each floor. In case of a fire, please remove the fire extinguisher and follow the directions attached to it



The school has implemented a comprehensive All Hazards Plan that includes warnings and notifications. This institution warning and notification system incorporates three methods:

1. The Institute of Beauty and Wellness maintains a telephone system that covers the entire campus. In an emergency this system will be activated, followed by voice messages giving instructions on what actions to take.
2. In an emergency, the Institute of Beauty and Wellness will notify students and guests about school closures and cancellations.
3. Information about emergencies at the Institute of Beauty and Wellness is disseminated to a larger community by the school's Administrative Director using the school's phone line and local news.

EMERGENCY (MEDICAL)

Notify staff immediately, who will call 911, in case of a medical emergency such as:

- Serious fall
- Apparent heart attack
- Unconsciousness
- Chemical product; (spills in the eye or swallowing)

The staff must provide the following information:

- Nature of medical problem
- Address of the building; and
- Location of the person in the building

The staff should:

- Notify the administrative personnel of the location and nature of the accident;
- Stay with the injured person; (or bring to Emergency)
- Have someone meet the emergency personnel; and
- Keep the area clear of bystanders

Students must assist in documenting the incident and forwarding the paperwork to the Administrative Director.

FIRE

The Institute has fire alarms located throughout the facility. If you report a fire, notify staff immediately and 911 will be called for assistance.

In all cases when the fire alarm sounds, students and staff *must*:

- Evacuate the building immediately
- Instruct all clients to evacuate the building
- Assist the clients who need help evacuating
- Request assistance for disabled clients to evacuate
- Walk to the far end of the parking lot or across the street in the parking lot
- Re-enter the building only when clearance has been given by the fire department or administration

Please see the posted fire exits for the nearest exit.

TORNADO WARNINGS

Whenever there is a danger of tornado touchdown, the tornado warning sirens for the Milwaukee downtown area will sound. Based on weather-service information the administration will make a decision on when to evacuate staff, students, and clients to the lower level of the building.

Please see the nearest posted sign if a tornado occurs for the safest rooms to go to. Students should move to the nearest internal room without windows, crouch down against the wall and cover their heads/neck with their hands.

Drug and Alcohol Policy

It is the policy of the Institute of Beauty and Wellness and Aveda Institute Madison to prohibit the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance (drugs) in or on the school's owned or controlled property. The possession, use and sale of alcoholic beverages on the campus is governed by

our institutional policies, as well as, Wisconsin state law and federal law. It is unlawful to sell, furnish, or provide alcohol to a person under the age of 21, and it is unlawful for a person under age to misrepresent his or her age in order to obtain alcohol. Violators are subject to institute disciplinary action (up to and including expulsion and termination of employment), criminal prosecution, fine, and imprisonment.

Health risks associated with the use and abuse of alcohol and illicit drugs

Alcohol consumption causes a number of marked changes in behavior. Even low doses of alcohol significantly impair the judgment and coordination required to drive a car safely, increasing the likelihood that the driver will be involved in an accident. The use of even small amounts of alcohol by a pregnant woman can damage the fetus. Low to moderate doses of alcohol also increases the likelihood of a variety of aggressive acts.

Moderate to high doses of alcohol cause marked impairment in higher mental functions, severely altering a person's ability to learn and remember information. Heavy use may result in chronic depression and suicide, and may also be associated with the abuse of other drugs. Very high doses can cause respiratory depression and death. If combined with other depressants of the central nervous system, much lower doses of alcohol will produce effects described above for very high doses. Long-term, heavy alcohol use can cause digestive disorders, cirrhosis of the liver, circulatory system disorders and impairment of the central nervous system, all of which may lead to early death.

Repeated use of alcohol can lead to dependence, some heavy users eventually will become problem drinkers or alcoholics if they continue drinking. Sudden cessation of alcohol intake is likely to produce withdrawal symptoms, including severe anxiety, tremors, hallucinations and convulsions, which can be life-threatening. The use of illegal drugs, and the misuse of prescription and other drugs, poses a serious threat to health. For example, the use of marijuana (cannabis) may cause impairment of short-term memory, comprehension, and ability to perform tasks requiring concentration.

The use of marijuana also may cause lung damage, paranoia and possible psychosis. The use of narcotics, depressants, stimulants and hallucinogens may cause nervous system disorders and possible death as the result of an overdose. Illicit inhalants can cause liver damage.

There are significant risks associated with the use of alcohol and drugs. These risks include impaired academic or work performance; lost potential; financial problems; poor concentration; blackouts; conflicts with friends and others; vandalism, theft and murder, sexual assault and other unplanned sexual relationships; spouse and child abuse; sexually transmitted diseases; and unusual or inappropriate risk-taking which may result in physical or emotional injury or death.

If you feel that you have an alcohol or drug problem, you may find help from the following alcohol and drug abuse counseling and support services:

Crisis help line: 262.257.7222

Parent help line: 414.671.7222

First call for help: 262.547.3388

Rogers Memorial Hospital: 414.327.3000 treatment for alcohol and drug addiction, depression, anxiety, and eating disorders

Allied counseling services: 920.674.9582

ARO counseling: 262.641.9050

Counseling Center of Milwaukee: 414.271.2565

Homeless resource: The Joy House 414.344.2211

The Women's Center: 262.547.4600 Business, 262.542.3828 Crisis Line, 888.542.3828 Toll Free Crisis Line

Sexual Violence Policy

On March 7, 2013, President Obama signed the Violence Against Women Reauthorization ACT of 2013 (VAWA) (Pub. Law 113-4), which, among other provisions, amended the Clery Act to require institutions to compile and disclose statistics for incidents of domestic violence, dating violence, sexual assault, and stalking and to include certain policies, procedures, and programs pertaining to these incidents in this report. The U.S. Department of Education published final regulations to implement the VAWA changes on October 20, 2014. Those final regulations have been effective since July 1, 2015.

The Institute of Beauty and Wellness and Aveda Institute Madison do not discriminate on the basis of sex in its educational programs and does not tolerate sexual harassment or sexual violence, which is a type of sex discrimination. Other acts can also be forms of sex-based discrimination and are also prohibited whether gender based or not and include dating violence, domestic violence, and stalking. The Institute of Beauty and Wellness and Aveda Institute Madison prohibits the offenses of domestic violence, dating violence, sexual assault and stalking and reaffirms its commitment to maintain a safe school environment. The Institute of Beauty and Wellness and Aveda Institute Madison encourages bystanders to call 911 immediately if they are witness to a risk of domestic violence, dating violence, sexual assault, or stalking against another person.

Sexual Harassment

The Institute of Beauty and Wellness and Aveda Institute Madison will not tolerate any form of sexual harassment. Sexual harassment is any conduct of "sexual" nature that interferes or may interfere with another person's learning or work performance or creates or may create an intimidating, hostile or offensive work environment. Specifically, sexual harassment is a form of misconduct, which is demeaning to another person and undermines the integrity of the learning environment or employment relationship.

For example, unwelcome physical contact, foul language, sexually oriented propositions, jokes or remarks, obscene gestures, or the display of sexually explicit pictures, cartoons, or other materials may be considered offensive to another student/employee and thus, should not occur. Consistent with this policy, students conduct, whether intentional or unintentional, that results in the harassment of other students or employees because of their sex, is illegal. It will not be tolerated and should be reported immediately to the administrative director.

Any student who believes that he or she has been sexually harassed should immediately report the matter to the Administrative Director. All other students have an obligation to report any instances of sexual harassment and to cooperate in a subsequent investigation. Anyone who fails to report inappropriate conduct which covers up another persons conduct or refuses to participate in an investigation is equally at fault and may be subject to discipline up to and including discharge from the program.

Definitions

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

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

Sexual Assault Sexual assault is any type of sexual contact or behavior that occurs without the explicit consent of the recipient. Consent means that both people in a sexual encounter must agree to it, and either person may decide at any time that he or she no longer consents and wants to stop the activity. Consenting to one behavior does not obligate you to consent to any other behaviors. Consenting on one occasion also does not obligate you to consent on any other occasion. Consenting means only that at this particular time, you would like to engage in this particular sexual behavior. Falling under the definition of sexual assault are sexual activities as forced sexual intercourse, forcible sodomy, child molestation, incest, fondling, and attempted rape.

National Sexual Assault Hotline: 1-800-656-4673

Consent is informed, voluntary and revocable. Consent is an affirmative, unambiguous, and conscious decision by each participant to engage in mutually agreed-upon sexual activity. It must be given without coercion, force, threats or intimidation. Consent must be ongoing throughout a sexual encounter and can be revoked at any time. Once consent is withdrawn, the sexual activity must stop immediately

Domestic Violence Domestic violence is a pattern of abusive behavior in any relationship that is used by one partner to gain or maintain power and control over another intimate partner. Domestic violence can be physical, sexual, emotional, economic, or psychological actions or threats of actions that influence another person. This includes any behaviors that intimidate, manipulate, humiliate, isolate, frighten, terrorize, coerce, threaten, blame, hurt, injure, or wound someone.

Physical abuse: Hitting, slapping, shoving, grabbing, pinching, biting, hair pulling, etc., are types of physical abuse. This type of abuse also includes denying a partner medical care or forcing alcohol and/or drug use upon him or her.

Sexual abuse: Sexual abuse is coercing or attempting to coerce any sexual contact or behavior without consent. Consent means that both people in a sexual encounter must agree to it, and either person may decide at any time that he or she no longer consents and wants to stop the activity. Consenting to one behavior does not obligate you to consent to any other behaviors. Consenting on one occasion also does not obligate you to consent on any other occasion. Consenting means only that at this particular time, you would like to engage in this particular sexual behavior. Sexual abuse includes, but is certainly not limited to, marital rape, attacks on sexual parts of the body, forcing sex after physical violence has occurred, or treating one in a sexually demeaning manner.

Emotional abuse: Undermining an individual's sense of self-worth and/or self-esteem is abusive. This may include, but is not limited to constant criticism, diminishing one's abilities, name-calling, or damaging one's relationship with his or her children.

Economic abuse: Economic abuse is defined as making or attempting to make an individual financially dependent by maintaining total control over financial resources, withholding one's access to money, or forbidding one's attendance at school or employment.

Psychological abuse: Elements of psychological abuse include, but are not limited to, causing fear by intimidation; threatening physical harm to self, partner, children, or partner's family or friends; destruction of pets and property; and forcing isolation from family, friends, or school and/or work.

Domestic violence can happen to anyone regardless of race, age, sexual orientation, religion, or gender. Domestic violence affects people of all socioeconomic backgrounds and education levels. Domestic violence occurs in both opposite-sex and same-sex relationships and can happen to intimate partners who are married, living together, or dating.

Domestic violence not only affects those who are abused, but also has a substantial effect on family members, friends, coworkers, other witnesses, and the community at large. Children who grow up witnessing domestic violence are among those seriously affected by this crime. Frequent exposure to violence in the home not only predisposes children to numerous social and physical problems, but also teaches them that violence is a normal way of life, therefore, increasing their risk of becoming society's next generation of victims and abusers.

National Domestic Violence Hotline: 1-800-799-7233

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 is dating violence. The existence of such a relationship shall be determined based on a consideration of the following factors:

- The length of the relationship
- The type of relationship
- The frequency of interaction between the persons involved in the relationship

National Teen Dating Abuse Hotline: 1-866-331-9474

Stalking a course of conduct directed at a specific person that would cause a reasonable person to feel fear. Stalking is a crime under the laws of all 50 states, the District of Columbia, the U.S. territories, and the federal government. Stalking is a pattern of repeated and unwanted attention, harassment, contact, or any other course of conduct directed at a specific person that would cause a reasonable person to feel fear.

Stalking can include:

- Repeated, unwanted, intrusive, and frightening communications from the perpetrator by telephone, mail, and/or email.
- Repeatedly leaving or sending the victim unwanted items, presents, or flowers.
- Following or waiting for the victim at places such as home, school, work, or recreational places.
- Making direct or indirect threats to harm the victim or the victim's children, relatives, friends, or pets.
- Damaging or threatening to damage the victim's property.
- Harassing the victim through the Internet.
- Posting information or spreading rumors about the victim on the Internet, in a public place, or by word of mouth.
- Obtaining personal information about the victim by accessing public records, using Internet search services, hiring private investigators, going through the victim's garbage, following the victim, contacting the victim's friends, family, work, or neighbors, etc.

National Stalking Victim Connect Hotline: 1-855-484-2846

Prohibited Conduct

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

- submission to such conduct is made either explicitly or implicitly a term or condition of an individual's education or employment;***
- submission to or rejection of such conduct by an individual is used as a basis for decisions concerning that individual's education or employment; or***
- it creates a hostile or offensive work environment, which means the alleged conduct is sufficiently serious to limit or deny a student's or ability to participate or benefit from the student's education program.***

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

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

Complaint/Grievance Procedure

If you believe that you have experienced or witnessed harassment or sexual violence, notify your instructor, supervisor, Human Resources, or the Title IX Coordinator as soon as possible after the incident. Do not allow an inappropriate situation to continue by not reporting it, regardless of who is creating the situation. No employee, contract worker, student, vendor or other person who does business with The Institute of Beauty and Wellness and Aveda Institute Madison is exempt from the prohibitions in this policy. Supervisors will refer all harassment complaints to the Title IX Coordinator for student-related complaints and to the Human Resources Department if the complaint involves an employee. In order to facilitate the investigation, your complaint should include details of the incident or incidents, names of the individuals involved and names of any witnesses.

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

Title IX Coordinator for The Institute of Beauty and Wellness

McKenna Shaffer

The Institute of Beauty and Wellness

Office Location: 2nd Floor, Rm 216 at The Institute of Beauty and Wellness

Phone: 414.319.7576

Email: mckenna@ibw.edu

The Institute of Beauty and Wellness and Aveda Institute Madison ensures that its employee(s) designated to serve as Title IX Coordinator(s) have adequate training on what constitute sexual harassment, including sexual violence, and that they understand how The Institute of Beauty and Wellness and Aveda Institute Madison’s grievance procedures operate. Because complaints can also be filed with an employee’s supervisor or Human Resources, these employees also receive training on The Institute of Beauty and Wellness and Aveda Institute Madison’s grievance procedures and any other procedures used for investigating reports of sexual harassment.

Investigation of Complaints

In response to all complaints, The Institute of Beauty and Wellness and Aveda Institute Madison promises prompt and equitable resolution through a reliable and impartial investigation of complaints, including the opportunity for both parties to present witnesses or other evidence. The time necessary to conduct an investigation will vary based on complexity but will generally be completed within sixty (60) days of receipt of the complaint. The Institute of Beauty and Wellness and Aveda Institute Madison shall maintain confidentiality for all parties to the extent possible, but absolute confidentiality cannot be guaranteed. In cases where a student does not give consent for an investigation, The Institute of Beauty and Wellness and Aveda Institute Madison will weigh the student’s request for confidentiality against the impact on The Institute of Beauty and Wellness and Aveda Institute Madison safety to determine whether an investigation must proceed. Complainants should be aware that in a formal investigation due process generally requires that the identity of the charging party and the substance of the complaint be revealed to the person charged

with the alleged harassment. The preponderance of the evidence standard will apply to investigations, meaning The Institute of Beauty and Wellness and Aveda Institute Madison will evaluate whether it is more likely than not that the alleged conduct occurred. Both parties will receive written notice of the outcome of the complaint.

During the investigation, The Institute of Beauty and Wellness and Aveda Institute Madison will provide interim measures, as necessary, to protect the safety and wellbeing of students and/or employees involved.

If The Institute of Beauty and Wellness and Aveda Institute Madison determine that unlawful harassment or sexual violence has occurred, immediate appropriate corrective action will be taken in accordance with the circumstances involved, and The Institute of Beauty and Wellness and Aveda Institute Madison will take steps to prevent the recurrence of any harassment or discrimination. Any employee determined by The Institute of Beauty and Wellness and Aveda Institute Madison to be responsible for unlawful harassment or discrimination will be subject to appropriate disciplinary action, up to and including termination. Remedies for student-related claims may include, but are not limited to, an order to stay away, suspension or expulsion.

To initiate a criminal investigation, reports of sexual violence should be made to "911" or local law enforcement. The criminal process is separate from The Institute of Beauty and Wellness and Aveda Institute Madison's disciplinary process. To the extent that an employee or contract worker is not satisfied with the College's handling of a harassment or discrimination complaint, he or she may also contact the appropriate state or federal enforcement agency for legal relief.

Retaliation Prohibited

The Institute of Beauty and Wellness and Aveda Institute Madison will not retaliate against you for filing a complaint, and will not tolerate retaliation by students or employees. If you believe you have been retaliated against, you should promptly notify your supervisor, Human Resources or the Title IX Coordinator.

Reporting Requirements

Victims of sexual misconduct should be aware that The Institute of Beauty and Wellness and Aveda Institute Madison administrators must issue timely warnings for incidents reported to them that pose a substantial threat of bodily harm or danger to other members of the campus community. The Institute of Beauty and Wellness and Aveda Institute Madison will make every effort to ensure that a victim's name and other identifying information is not disclosed, while still providing enough information for community members to make safety decisions in light of the danger. The Institute of Beauty and Wellness and Aveda Institute Madison reserves the right to notify parents/guardians of dependent students regarding any health or safety risk, or a change in student status.

Additional Information

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

Counseling, mental health or other student services for victims of sex offenses

The Counseling Center of Milwaukee, Inc.: 414.271.2565

The Sexual Assault Treatment Center of Greater Milwaukee: 414.219.5555

The Healing Center: 414.671.4325

Anti-Harassment and Discrimination Policy

(For students and employees)

The Institute of Beauty and Wellness and Aveda Institute Madison is committed to providing a work and school environment free of unlawful harassment or discrimination. In furtherance of this commitment, all students and employees are required to take our mandatory Sexual Harassment and Prevention Training during the first week of every new class and at each staff orientation. The Institute of Beauty and Wellness and Aveda Institute Madison policy prohibits harassment or discrimination based on race, religion, creed, color, national origin, ancestry, sex (including pregnancy, childbirth or related medical conditions), military or veteran status, physical or mental disability, medical condition, marital status, age, sexual orientation, gender, gender identity or expression, genetic information or any other basis protected by the federal, state or local law. Additionally, in accordance with Title IX of the Education Amendments of 1972, The Institute of Beauty and Wellness and Aveda Institute Madison prohibits discrimination based on sex, which includes sexual harassment and sexual violence, and The Institute of Beauty and Wellness and Aveda Institute Madison has jurisdiction over Title IX complaints.

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

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

Sexual Offender Registration

In accordance to the Campus Sex Crimes Prevention Act of 2000, the Clery Act, and the Family Rights and Privacy Act of 1974, The Institute of Beauty and Wellness and Aveda Institute Madison is providing information for where students and employees may obtain information regarding registered sex offenders. The Wisconsin Sex Offenders Registry may be found at <http://doc.wi.gov/community-resources/wi-sex-offender-registry> or by calling 608-240-5000.

The Campus Sex Crimes Prevention Act requires institutions of higher education to provide a statement advising the campus community where law enforcement information provided by a state concerning registered sex offenders can be obtained.

Annual Disclosure of Crime Statistics

Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (20 USC 1092(f)) requires colleges across the United States to disclose information about crime on and around their campuses. The Institute of Beauty and Wellness maintains a relationship with the Milwaukee police to ensure crimes reported on campus to the police are brought to the attention of the Institute of Beauty and Wellness.

Definitions of Reportable Crimes:

Murder/Manslaughter-defined as the willful killing of one human being by another

Negligent Manslaughter-defined as the killing of another person through gross negligence 12

Forcible Sex Offenses-defined as any sexual act directed against another person, forcibly and/or against that person's will; or not forcibly or against the person's will where the victim is incapable of giving consent. Including: forcible rape, forcible sodomy, sexual assault with an object, forcible fondling.

Non-forcible sex offense-unlawful, non-forcible sexual intercourse, including incest and statutory rape.

Robbery-defined as taking or attempting to take anything of value from the car, 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-defined as 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.

Burglary-unlawful entry of a structure to commit a felony or a theft.

Motor Vehicle Theft-theft or attempted theft of a motor vehicle.

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.

Domestic Violence- a felony or misdemeanor crime of violence committed by a current or former spouse or intimate partner of the victim, a person with whom the victim shares a child in common, a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, a person similarly situated to a spouse of the victim under the domestic or family violence laws of the

Dating Violence-a violence committed per a person who is or has been in a social relationship of a romantic or intimate nature with the victim and where the existence of such a relationship shall be determined based on a consideration of the following factors: the length of the relationship, the type of relationship and the frequency of interaction between the persons involved in the relationship.

Stalking-engaging in a course of conduct directly at a specific person that would cause a reasonable person to fear for his or her safety or the safety of others, or suffer substantial emotional distress.

Hate Crimes-includes all of the crimes listed above that manifest evidence that the victim was intentionally selected because the perpetrator's bias against the victim based on one of the Categories of Prejudice listed below, plus the following crimes.

Larceny/Theft-includes pocket picking, purse snatching, shoplifting, theft from building, theft from motor vehicle, theft of motor vehicle parts or accessories, and all other larceny.

Simple Assault-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 to Property (except Arson)-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.

Categories of Prejudice

Race-A preformed negative attitude toward a group of persons who possess common physical characteristics genetically transmitted by descent and heredity that distinguish them as a distinct division of humankind.

Gender-A preformed negative opinion or attitude toward a group of persons because those persons are male or female.

Religion-A preformed negative opinion or attitude toward a group of persons who share the same religious beliefs regarding the origin and purpose of the universe and the existence or nonexistence of a supreme being.

Sexual Orientation-A preformed negative opinion or attitude toward a group of persons of the same race or national origin who share common or similar traits, languages, customs, and traditions.

Disability-A preformed negative opinion or attitude toward a group of persons based on their physical or mental impairments/challenges, whether such disability is temporary or permanent, congenital or acquired by heredity, accident, injury, advanced age, or illness.

Gender Identity-A preformed negative opinion or attitude toward a group of persons because the perceived gender of those persons may be different from the gender traditionally associated with their gender at birth.

The following criminal offenses are published each year and must be reported no later than October 1st of each year. This includes any crime statistics that occurred on campus and in the immediate surrounding areas during the previous three year period.

Additional Resources

National Domestic Violence Hotline	<u>https://www.thehotline.org/</u>
National Sexual Assault Hotline	<u>https://www.rainn.org/</u>
National Teen Dating Abuse Hotline	<u>https://www.loveisrespect.org/</u>
Victim Connect	<u>https://victimconnect.org/</u>
National Alliance on Mental Illness	<u>https://www.nami.org/</u>
National Suicide Prevention Lifeline	<u>https://suicidepreventionlifeline.org/</u>
U.S. Department of Education Campus Safety and Security	<u>https://ope.ed.gov/campussafety/#/</u>
Milwaukee Police Department	<u>https://city.milwaukee.gov/police#.W6PLdmhKiUk</u>



Total Criminal Offenses Occurring on Campus Property				
Criminal Offense	2015	2016	2017	
Murder/Non-negilent manslaughter	0	0	0	
Manslaughter by negligence	0	0	0	
Rape	0	0	0	
Fondling	0	0	0	
Incest	0	0	0	
Statutory Rape	0	0	0	
Robbery	0	0	0	
Aggravated assault	0	0	0	
Burglary	0	0	0	
Motor Vechicle Theft	0	0	0	
Arson	0	0	0	

Total Criminal Offenses Occurring on Noncampus Buildings or Properties				
Criminal Offense	2015	2016	2017	
Murder/Non-negilent manslaughter	0	0	0	
Manslaughter by negligence	0	0	0	
Rape	0	0	0	
Fondling	0	0	0	
Incest	0	0	0	
Statutory Rape	0	0	0	
Robbery	0	0	0	
Aggravated assault	0	0	0	
Burglary	0	0	0	
Motor Vechicle Theft	0	0	0	
Arson	0	0	0	

Total Criminal Offenses Occurring on Public Property				
Criminal Offense	2015	2016	2017	
Murder/Non-negilent manslaughter	0	0	0	
Manslaughter by negligence	0	0	0	
Rape	0	0	0	
Fondling	0	0	0	
Incest	0	0	0	
Statutory Rape	0	0	0	
Robbery	0	0	0	
Aggravated assault	0	0	0	
Burglary	0	0	0	
Motor Vechicle Theft	0	0	0	
Arson	0	0	0	



VAWA Offenses Occuring on Campus Property				
	2015	2016	2017	
Domestic Violence	0	0	0	
Dating Violence	0	0	0	
Stalking	0	0	0	

VAWA Offenses Occuring on NonCampus Buildings or Properties				
	2015	2016	2017	
Domestic Violence	0	0	0	
Dating Violence	0	0	0	
Stalking	0	0	0	

VAWA Offenses Occuring on Public Property				
	2015	2016	2017	
Domestic Violence	0	0	0	
Dating Violence	0	0	0	
Stalking	0	0	0	



Total Number of Arrests Occurring on Campus Property				
Crime	2015	2016	2017	
Weapons: carrying, possessing, etc.	0	0	0	
Drug abuse violations	0	0	0	
Liquor law violations	0	0	0	

Total Number of Arrests Occurring on Noncampus Buildings or Properties				
Crime	2015	2016	2017	
Weapons: carrying, possessing, etc.	0	0	0	
Drug abuse violations	0	0	0	
Liquor law violations	0	0	0	

Total Number of Arrests Occurring on Public Property				
Crime	2015	2016	2017	
Weapons: carrying, possessing, etc.	0	0	0	
Drug abuse violations	0	0	0	
Liquor law violations	0	0	0	

Total Number of Persons Referred for Disciplinary Action on Campus Property				
Crime	2015	2016	2017	
Weapons: carrying, possessing, etc.	0	0	0	
Drug abuse violations	0	0	0	
Liquor law violations	0	0	0	

Total Number of Persons Referred for Disciplinary Action on Noncampus Buildings or Properties				
Crime	2015	2016	2017	
Weapons: carrying, possessing, etc.	0	0	0	
Drug abuse violations	0	0	0	
Liquor law violations	0	0	0	

Total Number of Persons Referred for Disciplinary Action on Public Property				
Crime	2015	2016	2017	
Weapons: carrying, possessing, etc.	0	0	0	
Drug abuse violations	0	0	0	
Liquor law violations	0	0	0	



Hate Crimes Occurring on Campus Property				
Criminal Offense	2015	2016	2017	
Murder/Non-negilent manslaughter	0	0	0	
Rape	0	0	0	
Fondling	0	0	0	
Incest	0	0	0	
Statutory Rape	0	0	0	
Robbery	0	0	0	
Aggravated assault	0	0	0	
Burglary	0	0	0	
Motor Vechicle Theft	0	0	0	
Arson	0	0	0	
Simple assault	0	0	0	
Lareceny-theft	0	0	0	
Intimidation	0	0	0	
Destruction/Damage/vandalism of property	0	0	0	

Hate Crimes Occurring on Noncampus Buildings or Properties				
Criminal Offense	2015	2016	2017	
Murder/Non-negilent manslaughter	0	0	0	
Rape	0	0	0	
Fondling	0	0	0	
Incest	0	0	0	
Statutory Rape	0	0	0	
Robbery	0	0	0	
Aggravated assault	0	0	0	
Burglary	0	0	0	
Motor Vechicle Theft	0	0	0	
Arson	0	0	0	
Simple assault	0	0	0	
Lareceny-theft	0	0	0	
Intimidation	0	0	0	
Destruction/Damage/vandalism of property	0	0	0	

Hate Crimes Occurring on Public Property				
Criminal Offense	2015	2016	2017	
Murder/Non-negilent manslaughter	0	0	0	
Rape	0	0	0	
Fondling	0	0	0	
Incest	0	0	0	
Statutory Rape	0	0	0	
Robbery	0	0	0	
Aggravated assault	0	0	0	
Burglary	0	0	0	

Motor Vehicle Theft	0	0	0	
Arson	0	0	0	
Simple assault	0	0	0	
Larceny-theft	0	0	0	
Intimidation	0	0	0	
Destruction/Damage/vandalism of property	0	0	0	



THE INSTITUTE OF
BEAUTY AND WELLNESS

Unfounded crimes occurring on Campus Property, Noncampus	2015	2016	2017
property or buildings, and on Public Property	0	0	0



**AVEDA INSTITUTE
MADISON**

Daily Crime Log

Date

Time

Nature of the Crime

General Location

Disposition of the Complainant



**THE INSTITUTE OF
BEAUTY AND WELLNESS**

Daily Crime Log

Date

Time

Nature of the Crime

General Location

Disposition of the Complainant

Gregory Mathews

From: Gregory Mathews
Sent: Monday, March 26, 2018 4:57 PM
To: 'mpdopenrecords@milwaukee.gov'
Cc: Gregory Mathews
Subject: Crime Report Request - The Institute of Beauty and Wellness

I am the Financial Aid Administrator at the Institute of Beauty and Wellness, a beauty school located at 327 East Saint Paul Avenue, Milwaukee, WI 53202.

Under the federal Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act), postsecondary schools are required to disclose statistics for certain crimes that occurred on campus and on public property within and immediately adjacent to school-owned buildings and property. In the statistics we are required to include crimes that were reported to our department as well as crimes reported to local and state law enforcement agencies.

I am requesting that your department provide me with crime statistics for 2015, 2016, and 2017 for the following offenses that occurred on our campus or on public property within and immediately adjacent to our property:

- Murder/Non-negligent Manslaughter
- Manslaughter by Negligence
- Rape
- Fondling
- Incest
- Statutory Rape
- Robbery
- Burglary
- Aggravated Assault
- Motor Vehicle Theft
- Arson

Please specify if any of the above-listed offenses were categorized as Hate Crimes. In addition, please include statistics for any incidents of Larceny-Theft, Simple Assault, Intimidation, or Destruction/Damage/Vandalism of Property that were classified as Hate Crimes. I also need the category of bias for each Hate Crime according to the eight categories for which we are required to report: Race, Religion, Sexual Orientation, Gender, Gender Identity, Disability, Ethnicity, and National Origin.

Please include statistics for arrests only for the following Uniform Crime Reporting (UCR) categories:

- Liquor Law Violations
- Drug Abuse Violations
- Weapons: Carrying, Possessing, Etc.

Please include separate statistics for all incidents of Domestic Violence, Dating Violence, and Stalking. For Clery Act reporting, we are required to use the following definitions for these terms:

Domestic Violence: The term “domestic violence” includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or 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.

Dating Violence: The term “dating violence” means violence committed by a person— (A) who is or has been in a social relationship of a romantic or intimate nature with the victim; and (B) where the existence of such a relationship shall be determined based on a consideration of the following factors: (i) The length of the relationship. (ii) The type of relationship. (iii) The frequency of interaction between the persons involved in the relationship.

Stalking: The term “stalking” means engaging in a course of conduct directed at a specific person that would cause a reasonable person to—(A) fear for his or her safety or the safety of others; or (B) suffer substantial emotional distress.

I am requesting the required statistics for the following areas that are considered to be “on campus”: 327 East Saint Paul Avenue, Milwaukee, WI 53202.

Any statistics you can provide about Milwaukee Police District #1 would also be greatly appreciated.

We are requesting this information early to allow you sufficient time to collect the information being requested. .

In addition, if a serious crime that may cause an ongoing threat to our campus community is reported to your department, we would appreciate it if you would notify us immediately. The institution has a legal responsibility to notify the campus community in a timely manner about any crimes on and immediately around the campus that pose an ongoing threat to the community. Thank you for your attention to this matter.

Sincerely,

Gregory Mathews
Financial Aid Administrator
The Institute of Beauty and Wellness – OPE ID: 038083
327 East Saint Paul Avenue
Milwaukee, WI 53202
414-319-7581
Gregory@ibw.edu



Milwaukee Police Department

Police Administration Building
749 West State Street
Milwaukee, Wisconsin 53233
<http://www.milwaukee.gov/police>

Alfonso Morales

Chief of Police

(414) 933-4444

April 27, 2018

The Institute of Beauty and Wellness
Attn: Gregory MATHEWS (Financial Aid Administrator)
327 E. St. Paul AV
Milwaukee, WI 53202

Dear Gregory MATHEWS:

This letter is in response to your records request dated March 26, 2018, in which you have made a request for records pursuant to the Wisconsin Public Records Law. Wis. Stat. §§ 19.31-39. You have requested the following:

- See Attached Request

The public policy in this state is to give the public the greatest amount of access to government records as possible. Wis. Stat. § 19.31. The general presumption is that government records are open to the public unless there is a clear statutory or common law exception. If there is no clear statutory or common law exception the custodian must "decide whether the strong presumption favoring access and disclosure is overcome by some even stronger public policy favoring limited access or nondisclosure." *Hempel v. City of Baraboo*, 2005 WI 120, § 28 (Citations omitted). Notwithstanding the presumption of openness, the public's right to access to public records is not absolute. *Journal/Sentinel v. Agerup*, 145 Wis. 2d 818, 822 (Ct. App. 1988).

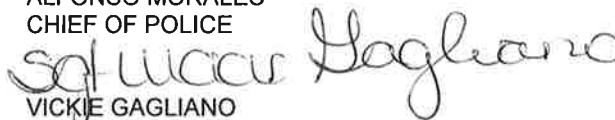
The records custodian has determined that the following items are all of the records found that are responsive to your request:

1. 2015 – 2017 crime statistics for the Institute of Beauty and Wellness

The records that MPD believes to be responsive records are enclosed. With the transmission of these records to you, the records custodian will consider your request closed.

Sincerely,

ALFONSO MORALES
CHIEF OF POLICE


VICKIE GAGLIANO
POLICE SERGEANT

EAF: JHP:jhp
H06324 Response Letter



Milwaukee Police Department

The Institute of Beauty and Wellness |
H06324

April 27, 2018

Milwaukee Police Department

Police Administration Building
Office of Management, Analysis & Planning
749 West State Street, Room 713
Milwaukee, Wisconsin 53233
Phone: 414-935-7835
E-mail: omap@milwaukee.gov



Requestor: Gregory Mathews-Financial Aid Administrator, the Institute of Beauty and Wellness

Request: 2015-2017 crime statistics for The Institute of Beauty and Wellness

Data Methods: Crime and arrest data was obtained and analyzed to determine if any incidents or arrests occurred at or adjacent to (within a 50ft. buffer) of the specified location listed as 327 E Saint Paul Av. for the time period of January 1-December 31, 2015-2017.

A report was generated to retrieve incidents of Murder/Non-Negligent Manslaughter (09A & 09B), Rape by new UCR definition (11A-11D), Incest (36A), Statutory Rape (36B), Robbery (120), Burglary (220), Aggravated Assault/Simple Assault (13A & 13B), Intimidation (13C), Arson (200), Theft (23A-23H), Auto Theft (240), Peeping Tom (90H) and Destruction/Damage/Vandalism of Property (290). Incidents that occurred directly at or adjacent to the address provided by the Institute of Beauty and Wellness were further analyzed to determine whether they were domestic violence related or whether they were categorized as Hate Crimes.

A separate report was generated to extract arrest data for Liquor Law Violations, Drug Violations and Illegal Weapons Violations. Arrests made directly at or adjacent to (within a 50ft. buffer) the address provided by the Institute of Beauty and Wellness were further analyzed to determine whether they were alcohol, drugs or weapons law violations related.

Summary: In 2015, there were two incidents of theft from building (23D). Similarly, in 2016 there were also two theft from building incidents that occurred at the specified address listed.

There were no arrests that occurred directly at or adjacent to (within a 50ft. buffer) the address provided by the Institute of Beauty and Wellness for the time periods listed above.

Questions: Questions pertaining to this document should be directed to the Milwaukee Police Department, Office of Management, Analysis & Planning at omap@milwaukee.gov or by phone at (414) 935-7835.



Milwaukee Police Department

H06324

327 E Saint Paul Av.

<i>IBRS CODE</i>	<i>Offense Description</i>	<i>2015</i>	<i>2016</i>	<i>2017</i>	<i>Bias</i>	<i>Domestic Violence</i>
09A	Murder/Non-Negligent Homicide	0	0	0	—	—
09B	Negligent Manslaughter	0	0	0	—	—
11A	Rape	0	0	0	—	—
11B	Forcible Sodomy	0	0	0	—	—
11C	Sexual Assault with an Object	0	0	0	—	—
11D	Fondling	0	0	0	—	—
36A	Incest	0	0	0	—	—
36B	Statutory Rape	0	0	0	—	—
120	Robbery	0	0	0	—	—
13A	Aggravated Assault	0	0	0	—	—
13B	Simple Assault	0	0	0	—	—
13C	Intimidation	0	0	0	—	—
220	Burglary	0	0	0	—	—
200	Arson	0	0	0	—	—
23A-23H	Larceny	2	0	2	Not Bias	Not DV Related
240	Auto Theft	0	0	0	—	—
290	Destruction/Damage/Vandalism of Property	0	0	0	—	—
Total		2	0	2	—	—

<i>Arrest Data</i>	<i>2015</i>	<i>2016</i>	<i>2017</i>
Liquor Law Violations	0	0	0
Drug Law Violations	0	0	0
Illegal Weapons Offenses	0	0	0