



September 30, 2024


Annual Security Report

Aveda Institute Portland and
Aveda Institute Portland Vancouver Campus

www.avedapdx.com

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503-294-6000

Vancouver Campus
6615 NE Fourth Plain Boulevard, Vancouver, WA 98661
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About the Report

This report was created to educate students, prospective students, employees, and prospective employees about Aveda Institute Portland and Aveda Institute Portland Vancouver Campus' safety policies and procedures. Portions of this report are also provided in compliance with the Higher Education Opportunity Act known as the Jeanne Clery Act. The Jeanne Clery Act requires universities and colleges to annually disclose crime statistics and certain policies related to safety and security. It is intended to provide students and their families with accurate, complete, and timely information about safety on campus to aid in making informed decisions.

Portions of this report are provided in compliance with the federal Drug-Free schools and Communities Act and the federal Student Right-To-Know and Campus Security Act. Finally, a portion of this report is provided in compliance with The Violence Against Women Reauthorization Act which amended the Jeanne Clery Act to afford additional rights to campus victims of sexual assault, domestic violence, dating violence, and stalking.

Report Preparation and Distribution

Multiple departments collaborate in order to obtain proper documentation and follow procedures outlined in this report. The Aveda Institute Portland Director of Compliance is primarily charged with compiling and publishing the Annual Security Report (ASR), working with school and enforcement agencies to collect information. The process includes gathering crime statistics from internal and external agencies where appropriate. Our goal is to publish an accurate and complete report for distribution to current and prospective students and staff.

Each year, an email notification is made to all enrolled students that provides the Annual Security Report in an attached file. Faculty and Staff receive a similar notification. Copies of the report may also be obtained through the student reporting system. All prospective students will receive a copy of this report via the student catalog. Prospective employees will receive a copy of this report via the employee handbook. Online, the report can be accessed via the link at avedapdx.com.

Access to Campus Facilities

Aveda Institute Portland and Aveda Institute Portland Vancouver Campus adhere to the following precautions in order to ensure the safety of students, staff, and patrons: No one should leave the building at night alone. After the clinic floor is closed, all doors shall be locked. No one will be permitted to remain in the building alone. All students are urged to put away personal property in their lockers, and staff should keep their valuables in a secure place. If a student is dismissed, graduates, or fails to return from a leave of absence it is his/her responsibility to empty his/her locker. Failure to do so will result in the lock being cut and contents boxed and held for 10 days. All locker contents held after 10 days will be disposed of.

Emergency Responses and Evacuation Procedures

The following procedure will be used to notify students and staff of a dangerous situation on the school campus; this includes the occurrence of Clery Act crimes. Instructors and staff members have received training on how to handle a pending emergency.

Emergency vs School Incident

Emergency: If at any point you feel that you are in imminent danger, please call 911 immediately. Any student or staff member can make this call as to not delay an immediate response needed. Then follow the procedure below.

School Incident: If something is or could be happening but can be resolved by staff or by calling non-emergency to have a police officer complete a report this is considered a school incident and not an emergency. In this case you would ensure the person that is reporting it speaks directly to the manager in charge and they will complete a School Incident Report located on the home screen of SharePoint – Team Site.

For any emergency

1. Call 911
2. Begin Evacuation or lock down procedure (found below)
3. Notify Director or Manager on Duty to send out Emergency Notifications

Timely Warning/Emergency Notification: The Director or person in charge will be responsible to send out a timely warning/emergency notification to the campus community via our intercom system (if available) and/or by push notification in the SalonBiz app regarding any health or safety situations. The instructors will ensure all students follow instructions. Any Instructor, Manager, or Director can initiate the alert. The Director or person in charge will notify the police who will notify the neighboring community of impending danger.

Through our intercom system and/or push notification via the Salon Biz app the following codes may be used to reflect the following situations:

Code 1: Emergency inside the building – Evacuate Campus

- Evacuate the building immediately and exit through the designated paths

Code 2: Emergency outside the building - Campus Lock Down

- Lock all outside doors and move as far away from all entrances and windows as possible

Code 1 Procedure to Evacuate the Campus:

1. Upon recognizing an emergency, the nearest staff member should take control of the situation and either call 911 or direct someone near them to do so and notify the Director or Manager on Duty.
2. In a calm and clear manner staff should direct everyone to the nearest safe exit.
3. The Director or Manager on Duty will send out a push notification on SalonBiz and/or over the internal intercom stating “Everyone must now evacuate the building. Please calmly follow the directions of staff.” at which point everyone evacuates the area immediately.
4. All Students, Guest and Staff should walk to the nearest exit. If you are with a client or if you have a client, take the client with you. Stay calm.
5. Everyone will meet for Instructors to take attendance. The Front Desk person should take the sign out sheet and use it to help instructors confirm who should or should not be in the building.
 - a. **Portland campus** students, guests and staff will meet on Flanders between 12th and 13th (next to Room & Board).
 - b. **Vancouver campus** students, guests and staff will meet on the sidewalk on Fourth Plain Boulevard in front of the building.
6. The Director or Manager on Duty should be the last person to leave the building ensuring all others have exited.
7. If the police were not able to be called, then The Director or Manager on Duty will call 911 but only after leaving the building.
 - a. Provide the following information:
 - i. **Portland Campus**
 1. Your name
 2. Address: Aveda Institute Portland | 325 NW 13th | Portland, OR 97209
 3. Phone Number: 503.294.6000
 4. Nature of the call: Fire, Police, First Aid, etc.
 - ii. **Vancouver Campus**
 1. Your name
 2. Address: Aveda Institute Portland Vancouver Campus | 6615 NE Fourth Plain Boulevard | Vancouver, WA 98661
 3. Phone Number: 360-326-0567
 4. Nature of the call: Fire, Police, First Aid, etc.

Code 2 Procedure for Campus Lock Down:

1. Upon recognizing an emergency, the nearest staff member should take control of the situation and either call 911 or direct someone near them to do so and notify the Director or Manager on Duty.
2. In a calm and clear manner staff should direct everyone away from the exits and windows towards the interior of the building.

3. The Director or Manager on Duty will send out a push notification on Salon Biz and/or over the internal intercom stating “Everyone must now move away from the exits and windows. Please calmly follow the directions of staff.” at which point everyone moves immediately to the interior of the building.
4. All Students, Guest and Staff should walk to the nearest safe place on site. If you are with a client or if you have a client, take the client with you. Stay calm.
5. Everyone will meet in the safest place on site for Instructors to take attendance. This may be a different area depending on the situation that is occurring. The best places may include:
 - a. **Portland Campus** - Spa 1 or Spa 2 and/or the break room.
 - b. **Vancouver Campus** - Spa and/or Spa lobby
6. The Front Desk person should lock the front door(s) and take the sign out sheet and use it to help instructors confirm who should or should not be in the building.
7. The Director or Manager on Duty should attempt to ensure that everyone is in the safe location in the building.
8. If the police were not able to be called, then the Director or Manager on Duty will now call 911 once in a safe place themselves.
 - a. Provide the following information:
 - i. **Portland Campus**
 1. Your name
 2. Address: Aveda Institute Portland | 325 NW 13th | Portland, OR 97209
 3. Phone Number: 503.294.6000
 4. Nature of the call: Fire, Police, First Aid, etc.
 - ii. **Vancouver Campus**
 1. Your name
 2. Address: Aveda Institute Portland Vancouver Campus | 6615 NE Fourth Plain Boulevard | Vancouver, WA 98661
 3. Phone Number: 360-326-0567
 4. Nature of the call: Fire, Police, First Aid, etc.

Emergency Number - 911

Non-Emergency Numbers –

Portland Campus

- Police Department (non-emergency) 503-823-3333
1111 S.W. 2nd Avenue, Portland, OR 97204
- Fire Department (non-emergency) 503-823-3700
55 SW Ash Street, Portland, OR 97204

Vancouver Campus

- Police Department (non-emergency) 360.693.3111
605 E Evergreen Blvd., Vancouver, WA 98661
- Fire Department (non-emergency) 360.487.7212
7110 63rd Street, Vancouver, WA 98661

Procedures for Students and Others to report Criminal Actions or other emergencies on campus

We refer all campus law enforcement issues to local police or other authorities since the institution does not have any campus-based security personnel. There is no written memorandum of understanding between Aveda Institute Portland or Aveda Institute Portland Vancouver Campus and local authorities. Aveda Institute Portland and Aveda Institute Portland Vancouver Campus encourages prompt reporting of criminal activity/actions as being in the best interest of all students/employees. We have designated the manager on duty as the contact person for any issues relating to campus security. We request that students report any criminal activity/actions on campus to the individual designated via the student reporting system with the subject noted as “security issue.” The designated individual will assist the student/employee in reporting the incident to the local police authorities. Please note that victims are not required to report

information to school authorities or local police authorities. Anyone remaining alone in the building shall securely lock all doors. Only a school manager or, in his/her absence, another designated individual opens and locks the school.

Please note that Aveda Institute Portland and Aveda Institute Portland Vancouver Campus do not employ pastoral counselors or professional counselors. The Aveda Institute Portland and Aveda Institute Portland Vancouver Campus do not have a procedure for voluntary, confidential reporting of crime statistics. Violations of the law will be referred to law enforcement agencies and when appropriate investigated by Aveda Institute Portland or Aveda Institute Portland Vancouver Campus. When a potentially dangerous threat to Aveda Institute Portland or Aveda Institute Portland Vancouver Campus arises, timely reports or warnings will be issued through SalonBiz notifications, intercom announcements, email announcements, the posting of fliers, in-class announcements, or other appropriate means.

Criminal activity/actions may be reported to the following individuals via the student reporting system with the subject noted as "security issue":

Chelsea Wescott – School Director	503-239-5395	Chelseaw@avedapdx.com
Niki Sparks – Director of Compliance	503-517-2579	Niki.Sparks@avedapdx.com
Presley Cockerham – Assistant Director	360-326-1264	Presley.Cockerham@avedapdx.com

Campus Security Procedures and Practices – Informing the Student Body and Staff

Employees and students both receive information about campus security procedures, practices, and crime prevention during application, enrollment, and orientation. Orientation is held for all incoming students on the Thursday prior to their official start date. During orientation, students receive information regarding crime on campus as well as how to request assistance and report crimes or security issues. Employees and students are encouraged to be responsible for their own security and the security of others. They receive general crime prevention information such as not leaving belongings unattended, how to guard against identity theft and sexual assault prevention and response.

Monitoring and recording off-campus student activity or facilities

Aveda Institute Portland and Aveda Institute Portland Vancouver Campus have no off-campus student organizations, nor does it have fraternities or sororities. Aveda Institute Portland and Aveda Institute Portland Vancouver Campus will help local law enforcement with student issues when requested, but we do not actively monitor off-campus, non-school sponsored activities or individuals' conduct off-campus.

Rules and Policies regarding possession, use, and sale of alcohol, drugs, or tobacco

Aveda Institute Portland and Aveda Institute Portland Vancouver Campus are Drug Free Environments. The use of alcohol, mood-altering, non-prescription chemicals, and the abuse of prescription chemicals on the Aveda Institute Portland campus and Aveda Institute Portland Vancouver Campus is not allowed. The unlawful manufacture, distribution, possession, or use of a controlled substance is prohibited at Aveda Institute Portland and Aveda Institute Portland Vancouver Campus. The possession, use, and sale of illegal drugs can be enforced by both Federal and State Drug Laws.

Violation of this policy is a severe offense for which the employee or student may be terminated on the first offense. If you have been prescribed a mood-altering chemical by a physician, please notify the Director immediately. Aveda Institute Portland and Aveda Institute Portland Vancouver Campus will not illegally discriminate based on this information. Oregon and Washington have strong laws allowing vehicles used to transport illegal drugs to be seized and forfeited. Alcohol is an illegal drug for those under 21. Most drugs are illegal, and a criminal conviction may bar a student from his or her chosen

career path, or an employee from employment with Aveda Institute Portland and Aveda Institute Portland Vancouver Campus. The health-risks associated with use of illicit drugs and alcohol abuse can be serious and numerous. Excessive or chronic alcohol consumption can negatively affect your heart, liver, and brain, just to name a few. Alcohol abuse can also be known to cause cancer.

All employees and students, as a condition of employment or enrollment, must agree to abide by the terms of this policy. In addition, all employees and students must notify Aveda Institute Portland or Aveda Institute Portland Vancouver Campus of any criminal drug statute conviction for a violation occurring on the campus no later than five (5) days after such conviction. Employees or students who appear to have a chemical dependency problem or any other problem that interferes with the performance of their assigned duties will be encouraged to pursue appropriate treatment. If treatment is refused or is not successful and performance is not acceptable, termination may occur. Seeking treatment, in and of itself, will not preclude disciplinary action for policy violations or performance issues which have occurred or continue to occur.

Drug and Alcohol Abuse Education programs and counseling

Any student or staff member who has personal concerns about the use or abuse of alcohol is urged to contact the resources below. Passive programming regarding drug and alcohol abuse education is displayed prominently on student communication boards and information is rotated frequently. Students may speak with the Aveda Institute Portland or Aveda Institute Portland Vancouver Campus Student Services department or School Director if they would like further assistance. Additional resources are listed below:

Alcoholics Anonymous **360-694-3870**
Cocaine Anonymous 503-256-1666
Smart Recovery 866-951-5357

Narcotics Anonymous 800-509-8918
Helpline 866-789-1511
Lines for Life 800-626-8137

Sex-Based Harassment Policies & Grievance Procedures

1. Introduction

Aveda Institute Portland and Aveda Institute Portland Vancouver Campus (the "Institute") are committed to providing a working and educational environment for all students, faculty and staff that is free from sex discrimination, including sex-based harassment. Every member of the Institute community should be aware that the Institute is strongly opposed to sex-based harassment, and that such behavior is prohibited by state and federal laws.

The Institute does not discriminate on the basis of sex and prohibits sex discrimination in any education program or activity that it operates, as required by Title IX and its regulations, including in admission and employment. Sex discrimination is prohibited by Title IX of the Education Amendments of 1972, a federal law that provides:

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

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

2. Scope of the Policy

Aveda Institute Portland and Aveda Institute Portland Vancouver Campus have adopted Title IX grievance procedures that provide for the prompt and equitable resolution of complaints made by students, employees, the Title IX Coordinator,

or other individuals who are participating or attempting to participate in its education program or activity. These grievance procedures address complaints of sex-based harassment that involve a student party.

The Institute encourages victims of sex-based harassment to talk to somebody about what happened – so victims can get the support they need, and so the Institute can respond appropriately. As further described in this Policy, the Institute will seek to respect a victim's request for confidentiality to the extent possible, while remaining ever mindful of the victim's well-being.

3. Prohibited Conduct

Sex-based harassment is a form of sex discrimination and means sexual harassment and other harassment on the basis of sex, including on the basis of sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity. Sex-based harassment includes an Institute employee conditioning the provision of a Institute aid, benefit, or service on an individual's participation in unwelcome sexual conduct. Unwelcome sex-based conduct that is subjectively and objectively offensive and is so severe or pervasive that it limits or denies a person's ability to participate in or benefit from the Institute's education program or activity (*i.e.*, creates a hostile environment) also constitutes sex-based harassment. Sexual assault, stalking, domestic violence, and dating violence are all forms of sex-based harassment. Retaliation following an incident of alleged sex-based harassment or attempted sex-based harassment is strictly prohibited. The definitions for specific acts of sex-based harassment can be found in the Definitions of Key Terms at the end of this Policy statement.

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

4. Options for Assistance Following an Incident of Sex-Based Harassment

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

Reporting Incidents of Sex-Based Harassment

Victims of sex-based harassment may file a report with the Portland or Vancouver Police Department, as appropriate. Victims may also file a report with the Institute's Title IX Coordinator. More information about reporting an incident of sex-based harassment can be found in Section 6 of this Policy, below.

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

Supportive Measures

The Institute's Title IX Coordinator will work with all students affected by sex-based harassment to ensure their safety and support their wellbeing. This assistance may include providing supportive measures to support and/or protect a student after an incident of sex-based harassment and while an investigation or disciplinary proceeding is pending. "Supportive measures" means individualized measures offered as appropriate, as reasonably available, without unreasonably burdening a complainant or respondent, not for punitive or disciplinary reasons, and without fee or charge to the complainant or respondent to (1) restore or preserve that party's access to the Institute's education program or activity,

including measures that are designed to protect the safety of the parties or the Institute's educational environment; or (2) provide support during the Institute's grievance procedures or during an informal resolution process.

Supportive measures may include:

- counseling,
- extensions of deadlines or other course-related adjustments,
- campus escort services,
- increased security and monitoring of certain areas of the campus,
- restrictions on contact applied to one or more parties,
- leaves of absence,
- changes in class, work housing, or extracurricular or other activity, and
- training and education programs related to sex-based harassment.

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

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

Support Services Available

Counseling, advocacy and support services are available for complainants, whether or not a complainant chooses to make an official report or participate in the Institute's grievance procedures or criminal process. **Aveda Institute Portland and Aveda Institute Portland Vancouver Campus do not provide counseling or health care services.**

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

National Resources:

National Sexual Assault Hotline: 800-656-4673

National Domestic Violence Hotline: 800-799-7233

National Institute of Mental Health: www.nimh.nih.gov

Rape, Abuse, and Incest National Network: <https://rainn.org>

Substance Abuse and Mental Health Administration: www.samhsa.gov/find-help/national-helpline, 1-800-662-HELP (4357)

Local Resources:

Call to Safety (formerly The Portland Women's Crisis Line)

503-235-5333

www.calltosafety.org.

Washington State Domestic Violence Hotline

1-800-562-6025

Sexual Assault Resource Center
360-695-0501

Evidence Preservation

Victims of sexual assault, domestic violence or dating violence should consider seeking medical attention as soon as possible. It is important that a victim of sexual assault not bathe, douche, smoke, change clothing or clean the bed/linen where they were assaulted so that evidence necessary to prove criminal activity may be preserved. In circumstances where the victims do not opt for forensic evidence collection, health care providers can still treat injuries and take steps to address health concerns. Victims of sex-based harassment are encouraged to also preserve evidence by saving text messages, instant messages, social networking pages, other communications, and keeping pictures, logs or other copies of documents, if they have any, that would be useful in connection with a Institute or police investigation.

5. Title IX Coordinator

The Institute's Title IX Coordinator is responsible for monitoring and overseeing the Institute's compliance with Title IX and the prevention of sex-based harassment and discrimination. The Title IX Coordinator is:

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

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

Portland Campus
Onsite Title IX Coordinator:
Niki Sparks
325 NW 13th Avenue
Portland, OR 97209
(503) 517-2579
Niki.sparks@avedapdx.com

Vancouver Campus
Onsite Title IX Coordinator
Presley Cockerham
6615 NE 4th Plain Boulevard
Vancouver, WA 98661
(360) 326-1264
Presley.Cockerham@avedapdx.com

Offsite Title IX Coordinator

Tracie Bryant
Corporate Office
1018 SE 8th Avenue
Portland, OR 97214
(503) 517-2580
Tracie@avedapdx.com

6. Reporting Policies and Protocols

Aveda Institute Portland and Aveda Institute Portland Vancouver Campus strongly encourage all members of the Institute community to report information about any incident of sex-based harassment as soon as possible. Reports can be made either to the Institute and/or to law enforcement.

Reporting to the Institute

The following individuals have a right to make a complaint of sex-based harassment, requesting that the Institute investigate and make a determination about alleged sex-based harassment under Title IX:

- A “complainant,” which includes:
 - a student or employee of the Institute who is alleged to have been subjected to conduct that could constitute sex discrimination under Title IX; or
 - a person other than a student or employee of the Institute who is alleged to have been subjected to conduct that could constitute sex discrimination under Title IX at a time when that individual was participating or attempting to participate in the Institute’s education program or activity;
- A parent, guardian, or other authorized legal representative with the legal right to act on behalf of a complainant; or
- The Institute’s Title IX Coordinator.

The Institute may consolidate complaints of sex discrimination against more than one respondent, or by more than one complainant against one or more respondents, or by one party against another party, when the allegations of sex discrimination arise out of the same facts or circumstances. When more than one complainant or more than one respondent is involved, references below to a party, complainant, or respondent include the plural, as applicable.

Any person may report sex discrimination, including sex-based harassment (whether or not the person reporting is the person alleged to be the victim of conduct that could constitute sex discrimination or sex-based harassment), in person, by mail, by telephone, or by electronic mail, using the contact information listed in Section 5 for the Title IX Coordinator. Such a report may be made at any time (including during non-business hours) by using the telephone number or email address, or by mail to the office address, listed for the Title IX Coordinator.

While there is no time limit for reporting, reports of sex discrimination or harassment should be brought forward as soon as possible. All incidents should be reported even if significant time has elapsed, but prompt reporting will better enable the Institute to respond, investigate, provide an appropriate remedy, and impose discipline if appropriate. The Institute is committed to supporting the rights of a person reporting an incident of sex discrimination including sex-based harassment to make an informed choice among options and services available.

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

Reporting to Law Enforcement

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

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

Reporting of Crimes & Annual Security Reports

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

Each year the Institute prepares an annual security report to comply with the Clery Act. The full text of this report can be located on the Institute's web site at www.avedapdx.com. This report is prepared in cooperation with the local law enforcement agencies around our campus. Each year notification is made to all enrolled students and employees that provides the web site to access this report. Copies of the report may also be obtained in person from the campus Director at each campus or by calling (503) 517-2579 (Portland campus) or (360) 326-0567 (Vancouver campus). All prospective employees may also obtain a copy from the campus Director.

Timely Warnings & Emergency Notifications

In the event that a situation arises, either on or off campus, that, in the judgment of the campus Director constitutes an ongoing or continuing threat, a campus wide "timely warning" will be issued. The campus Director will also immediately notify the Institute community upon the confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or staff occurring at the Institute, unless issuing a notification will compromise efforts to contain the emergency. The warning will be issued through the most effective and efficient means available and may include instant messaging to students and Institute employees. Notices may also be posted in the common areas throughout the Institute. Anyone with information warranting a timely warning or emergency notification should report the circumstances to the campus Director by phone at (503) 517-2579 (Portland campus) or (360) 326-0567 (Vancouver campus), or in person at the Institute. The Institute will provide adequate follow-up information to the community as needed.

Third-Party and Anonymous Reporting

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

No Retaliation

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

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

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

Coordination With Drug Free School Policy

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

7. Institute Policy on Confidentiality

The Institute encourages victims of sex discrimination including sex-based harassment to talk to somebody about what happened – so victims can get the support they need, and so the Institute can respond appropriately.

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

Privileged and Confidential Communications – Professional & Pastoral Counselors

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

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

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

Reporting to the Institute

Complainants are encouraged to report incidents of sex-based discrimination to the Title IX Coordinator. The Title IX Coordinator contact information is listed in Section 5 of this Policy and is also published on the Institute's website and in the Institute's catalog. Note that all Institute employees have a duty to notify the Title IX Coordinator of any conduct that reasonably may constitute sexual discrimination. To the extent possible, information reported to the Title IX Coordinator will be shared only with people responsible for handling the Institute's response to the report. The Title IX Coordinator should not share information with law enforcement without the complainant's consent or unless the complainant has also reported the incident to law enforcement or unless otherwise required by law.

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

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

Requesting Confidentiality: How the Institute Will Weigh the Request and Respond

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

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

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

- The increased risk that the respondent will commit additional acts of sex-based harassment or other violence, such as:
 - whether there have been other sex-based harassment complaints about the same respondent;
 - whether the respondent has a history of arrests or records from a prior institution indicating a history of violence;
 - whether the respondent threatened further sex-based harassment or other violence against the complainant or others;
 - whether the sex-based harassment was committed by multiple respondents;
- Whether the sex-based harassment was perpetrated with a weapon;
- Whether the complainant is a minor;
- Whether the Institute possesses other means to obtain relevant evidence of the sex-based harassment (e.g., security cameras or personnel, physical evidence);
- Whether the Institute has a legal obligation to report the harassment to the Police or otherwise take action;
- Whether the complainant's report reveals a pattern of perpetration (e.g., via illicit use of drugs or alcohol) at a given location or by a particular group.

The presence of one or more of these factors could lead the Title IX Coordinator to initiate a complaint. If none of these factors is present, the Institute will likely respect the complainant's request for confidentiality.

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

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

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

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

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

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

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

8. Grievance Procedures and Protocols

Once the Institute has knowledge of conduct that reasonably may constitute sex discrimination in its education program or activity, it will respond promptly and effectively. The Title IX Coordinator will take the following actions upon being notified of conduct that reasonably may constitute sex discrimination:

- Treat the complainant and respondent equitably.
- Offer and coordinate supportive measures, as appropriate, for the complainant. If the Institute has initiated grievance procedures or offered an informal resolution process to the respondent, the Title IX Coordinator will offer and coordinate supportive measures as appropriate, for the respondent.
- Notify the complainant, or if the complainant is unknown, the individual who reported the conduct, of the Institute's grievance procedures and the informal resolution process.
- If a complaint is made, notify the respondent of the grievance procedures and the informal resolution process.
- In response to a complaint, initiate the Institute's grievance procedures or informal resolution process.
- Regardless of whether a complaint is initiated, take other appropriate prompt and effective steps to ensure that sex discrimination does not continue or recur within the Institute's education program or activity, in addition to providing remedies to an individual complainant.

The Institute presumes that the respondent is not responsible for the alleged sex discrimination unless and until a determination of responsibility is made at the conclusion of its grievance procedures.

The Institute's Title IX Coordinator oversees the Institute's investigation, response to, and resolution of all reports of prohibited sex-based harassment, and of related retaliation, involving students, faculty, and staff. In response to a complaint, the Title IX Coordinator will initiate the grievance procedures under this Policy, or the informal resolution process described below if appropriate and requested by all parties.

In the absence of a complaint or upon the withdrawal of any or all of the allegations in a complaint, and in the absence or termination of an informal resolution process, the Title IX Coordinator shall determine whether to initiate a complaint of sex discrimination or harassment and the grievance procedures set forth in this Policy. To make this fact-specific determination, the Title IX Coordinator must consider, at a minimum, the following factors:

- 1) The complainant's request not to proceed with initiation of a complaint;
- 2) The complainant's reasonable safety concerns regarding initiation of a complaint;
- 3) The risk that additional acts of sex discrimination or harassment would occur if a complaint is not initiated.
- 4) The severity of the alleged sex discrimination or harassment, including whether the discrimination or harassment, if established, would require the removal of a respondent from campus or imposition of another disciplinary sanction to end the discrimination and prevent its recurrence;

- 5) The age and relationship of the parties, including whether the respondent is an employee of the Institute;
- 6) The scope of the alleged sex discrimination, including information suggesting a pattern, ongoing sex discrimination, or sex discrimination alleged to have impacted multiple individuals;
- 7) The availability of evidence to assist a decisionmaker in determining whether sex discrimination occurred; and
- 8) Whether the Institute could end the alleged sex discrimination or harassment and prevent its recurrence without initiating these grievance procedures.

If, after considering these and other relevant factors, the Title IX Coordinator determines that the conduct as alleged presents an imminent and serious threat to the health or safety of the complainant or other person, or that the conduct as alleged prevents the Institute from ensuring equal access on the basis of sex to its education program or activity, the Title IX Coordinator may initiate a complaint. If initiating a complaint under this provision, the Title IX Coordinator will notify the complainant prior to doing so and appropriately address reasonable concerns about the complainant's safety or the safety of others, including by providing supportive measures.

The Institute requires that any Title IX Coordinator, investigator, or decisionmaker not have a conflict of interest or bias for or against complainants or respondents generally or an individual complainant or respondent. As long as there is no conflict of interest or bias, a decisionmaker may be the same person as the Title IX Coordinator and/or investigator. The Institute will inform the complainant and respondent of the investigator and the decisionmaker at the beginning of any grievance process and at least two days before any formal interviews have begun. A complainant and/or respondent may challenge the participation of an investigator or decisionmaker because of perceived conflict of interest, bias, or prejudice. Such challenges, including rationale, must be made to the Title IX Coordinator. At its discretion, the Title IX Coordinator will determine whether such a conflict of interest exists and whether an investigator or decisionmaker should be replaced.

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

Where necessary, the Institute will take prompt steps to protect complainants pending the final outcome of an investigation, including the provision of supportive measures to the complainant and/or the respondent. The Institute may remove a respondent from the Institute's education programs or activities on an emergency basis, provided that the Institute (1) undertakes an individualized safety and risk analysis, (2) determines that an imminent and serious threat to the physical health or safety of any student or other individual arising from the allegations of sex discrimination justifies removal, and (3) provides the respondent with notice and an opportunity to challenge the decision immediately following the removal. The Institute may place a non-student employee respondent on administrative leave during the pendency of a grievance process.

The Institute will take steps to protect the privacy of the parties and witnesses during its grievance procedures. These steps will not restrict the ability of the parties to obtain and present evidence, including by speaking to witnesses; consult with their family members, confidential resources, or advisors; or otherwise prepare for or participate in the grievance procedures. The parties cannot engage in retaliation, including against witnesses.

The Institute will objectively evaluate all evidence that is relevant and not otherwise impermissible - including both inculpatory and exculpatory evidence. Credibility determinations will not be based on a person's status as a complainant, respondent, or witness.

The following types of evidence, and questions seeking that evidence, are impermissible (*i.e.*, will not be accessed or considered, except by the Institute to determine whether one of the exceptions listed below applies; will not be disclosed; and will not otherwise be used), regardless of whether they are relevant:

- Evidence that is protected under a privilege recognized by Federal or State law, unless the person to whom the privilege or confidentiality is owed has voluntarily waived the privilege or confidentiality;
- A party's or witness's records that are made or maintained by a physician, psychologist, or other recognized professional or paraprofessional in connection with the provision of treatment to the party or witness, unless the Institute obtains that party's or witness's voluntary, written consent for use in its grievance procedures; and
- Evidence that relates to the complainant's sexual interests or prior sexual conduct, unless evidence about the complainant's prior sexual conduct is offered to prove that someone other than the respondent committed the alleged conduct or is evidence about specific incidents of the complainant's prior sexual conduct with the respondent that is offered to prove consent to the alleged sex-based harassment. The fact of prior consensual sexual conduct between the complainant and respondent does not by itself demonstrate or imply the complainant's consent to the alleged sex-based harassment or preclude determination that sex-based harassment occurred.

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

Notice

Upon initiation of these Title IX grievance procedures, the Institute will notify the parties in writing of the following with sufficient time for the parties to prepare a response before any initial interview:

- The Institute's Title IX grievance procedures and any informal resolution process;
- Sufficient information available at the time to allow the parties to respond to the allegations, including the identities of the parties involved in the incident(s), the conduct alleged to constitute sex-based harassment, and the date(s) and location(s) of the alleged incident(s);
- Retaliation is prohibited;
- The respondent is presumed not responsible for the alleged sex-based harassment until a determination is made at the conclusion of the grievance procedures. Prior to such a determination, the parties will have an opportunity to present relevant and not otherwise impermissible evidence to a trained, impartial decisionmaker;
- The parties may have an advisor of their choice who may be, but is not required to be, an attorney;
- The parties are entitled to an equal opportunity to access the relevant and not otherwise impermissible evidence; and
- The Institute prohibits knowingly making false statements or knowingly submitting false information during the grievance procedures.

If, in the course of an investigation, the Institute decides to investigate additional allegations of sex-based harassment by the respondent toward the complainant that are not included in the written notice or that are included in a consolidated complaint, it will provide written notice of the additional allegations to the parties.

Dismissal of a Complaint:

The Institute may dismiss a complaint if:

- The Institute is unable to identify the respondent after taking reasonable steps to do so;
- The respondent is not participating in the Institute's education program or activity and is not employed by the Institute;

- The Institute obtains the complainant's voluntary withdrawal in writing of any or all of the allegations, the Title IX Coordinator declines to initiate a complaint, and the Institute determines that, without the complainant's withdrawn allegations, the conduct that remains alleged in the complaint, if any, would not constitute sex discrimination including sex-based harassment under Title IX even if proven; or
- The Institute determines the conduct alleged in the complaint, even if proven, would not constitute sex discrimination including sex-based harassment under Title IX. Before dismissing the complaint, the Institute will make reasonable efforts to clarify the allegations with the complainant.

Upon dismissal, the Institute will promptly notify the complainant in writing of the basis for the dismissal. If the dismissal occurs after the respondent has been notified of the allegations, then the Institute will notify the parties simultaneously in writing.

The Institute will notify the complainant that a dismissal may be appealed on the bases outlined in the Appeals section of these grievance procedures. If dismissal occurs after the respondent has been notified of the allegations, then the Institute will also notify the respondent that the dismissal may be appealed on the same bases. If a dismissal is appealed, the Institute will follow the procedures outlined in the Appeals section.

When a complaint is dismissed, the Institute will, at a minimum:

- Offer supportive measures to the complainant as appropriate;
- If the respondent has been notified of the allegations, offer supportive measures to the respondent as appropriate; and
- Take other prompt and effective steps, as appropriate, through the Title IX Coordinator to ensure that sex discrimination does not continue or recur within the Institute's education program or activity

Informal Resolution

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

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

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

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

In connection with any informal resolution process, the Institute will provide written notice to the parties disclosing the allegations and the requirements of the informal resolution process. The Institute will notify the parties that any time prior to agreeing to a resolution, any party has the right to withdraw from the informal resolution process and resume the grievance process with respect to the complaint any time before agreeing to a resolution. If the parties agree to a

resolution at the end of the informal resolution process, they cannot initiate or resume grievance procedures arising from the same allegations. The Institute must obtain the parties' voluntary, written consent to the informal resolution process. The informal resolution process may not be utilized to resolve allegations that an Institute employee sexually harassed a student.

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

Investigation and Decision Process

The burden of proof and the burden of gathering evidence sufficient to reach a determination regarding responsibility rests on the Institute and not on the parties. The Title IX Coordinator is responsible for the investigation and determination of a complaint. The Title IX Coordinator may serve as the investigator and decisionmaker. Alternatively, the Title IX Coordinator may designate a specially trained investigator (or team of investigators) to conduct the investigation and make the determination of whether the alleged conduct violates this Policy.

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

The Institute will provide written notice of the date, time, location, participants, and purpose of all meetings or proceedings to a party whose participation is invited or expected, with sufficient time for the party to prepare to participate.

The Institute will provide the parties with the same opportunities to be accompanied to any meeting or proceeding by the advisor of their choice, who may be, but is not required to be, an attorney. The Institute will not limit the choice or presence of the advisor for the complainant or respondent in any meeting or proceeding. The Institute may establish restrictions regarding the extent to which the advisor may participate in these grievance procedures, as long as the restrictions apply equally to the parties.

The Institute will provide the parties with the same opportunities, if any, to have people other than the advisor of the parties' choice present during any meeting or proceeding.

The Institute will provide an equal opportunity for the parties to present fact witnesses and other inculpatory and exculpatory evidence that are relevant and not otherwise impermissible.

The Institute will review all evidence gathered through the investigation and determine what evidence is relevant and what evidence is impermissible regardless of relevance.

The Institute will provide each party and the party's advisor, if any, with an equal opportunity to access the evidence that is relevant to the allegations of sex-based harassment and not otherwise impermissible, in the following manner:

- The Institute will provide an equal opportunity to access the relevant and not otherwise impermissible evidence;
- The Institute will further provide the parties with an equal opportunity to access the relevant and not otherwise impermissible evidence upon the request of any party;
- The Institute will provide a reasonable opportunity to review and respond to the evidence; and
- The Institute will take reasonable steps to prevent and address the parties' and their advisors' unauthorized disclosure of information and evidence obtained solely through the sex-based harassment grievance procedures.

Questioning the Parties and Witnesses

The investigator will interview the complainant, respondent, and any witnesses. They will also gather pertinent documentary materials (if any) and other information. The Institute will provide, to a party whose participation is invited or

expected, written notice of the date, time, location, participants, and purpose of all hearings, investigative interviews, or other meetings, with sufficient time for the party to prepare to participate. Each party shall have an equal opportunity to present witnesses, including fact and expert witnesses, and other inculpatory and exculpatory evidence. The Institute will not restrict the ability of either party to discuss the allegations under investigation or to gather and present relevant evidence.

The decisionmaker will question the parties and any identified witnesses to adequately assess a party's or witness's credibility to the extent credibility is both in dispute and relevant to evaluating one or more allegations of sex-based harassment. More specifically:

- The investigator or decisionmaker will ask such questions during individual meetings with a party or witness;
- Each party will be provided the opportunity to propose such questions that the party wants asked of any party or witness and have those questions asked by the investigator or decisionmaker during one or more individual meetings, including follow-up meetings, with a party or witness, subject to the procedures for evaluating and limiting questions discussed below; and
- Each party will be provided with an audio or audiovisual recording or transcript with enough time for the party to have a reasonable opportunity to propose follow-up questions.

Procedures for the investigator to evaluate the questions and limitations on questions

The investigator will determine whether a proposed question is relevant and not otherwise impermissible before the question is posed and will explain any decision to exclude a question as not relevant or otherwise impermissible. Questions that are unclear or harassing of the party or witness being questioned will not be permitted. The investigator will give a party an opportunity to clarify or revise a question that the investigator determines is unclear or harassing. If the party sufficiently clarifies or revises the question, the question will be asked. The investigator may choose to place less or no weight upon statements by a party or witness who refuses to respond to questions deemed relevant and not impermissible. The investigator will not draw an inference about whether sex-based harassment occurred based solely on a party's or witness's refusal to respond to such questions.

Determining Whether Sex-Based Harassment Occurred

Following an investigation and evaluation of all relevant and not otherwise impermissible evidence, the Institute will:

- Use the preponderance of the evidence standard of proof to determine whether sex discrimination occurred. Preponderance of the evidence means that the decisionmaker must be convinced based on the information it considers that the respondent was more likely than not to have engaged in the conduct at issue in order to find the respondent responsible for violating the Policy. The standard of proof requires the decisionmaker to evaluate relevant and not otherwise impermissible evidence for its persuasiveness. If the decisionmaker is not persuaded under the applicable standard by the evidence that sex discrimination occurred, whatever the quantity of the evidence is, the decisionmaker will not determine that sex discrimination occurred.
- Notify the parties simultaneously in writing of the determination whether sex-based harassment occurred under Title IX including:
 - A description of the alleged sex-based harassment;
 - Information about the policies and procedures that the decisionmaker used to evaluate the allegations;
 - The decisionmaker's evaluation of the relevant and not otherwise impermissible evidence and determination whether sex-based harassment occurred;
 - When the decisionmaker finds that sex-based harassment occurred, any disciplinary sanctions the Institute will impose on the respondent, whether remedies other than the imposition of disciplinary sanctions will be provided by the Institute to the complainant, and, to the extent appropriate, other students identified by the Institute to be experiencing the effects of the sex-based harassment; and
 - The Institute's procedures and permissible bases for the complainant and respondent to appeal and when the results are final.
- The Institute will not impose discipline on a respondent for sex discrimination prohibited by Title IX unless there is a determination at the conclusion of the Title IX grievance procedures that the respondent engaged in prohibited sex discrimination.
- If there is a determination that sex discrimination occurred, as appropriate, the Title IX Coordinator will:

- Coordinate the provision and implementation of remedies to a complainant and other people the Institute identifies as having had equal access to the Institute's education program or activity limited or denied by sex discrimination;
- Coordinate the imposition of any disciplinary sanctions on a respondent, including notification to the complainant of any such disciplinary sanctions; and
- Take other appropriate prompt and effective steps to ensure that sex discrimination does not continue or recur within the Institute's education program or activity.
- Comply with the Title IX grievance procedures before the imposition of any disciplinary sanctions against a respondent; and
- Not discipline a party, witness, or others participating in the Title IX grievance procedures for making a false statement or for engaging in consensual sexual conduct based solely on the determination whether sex discrimination occurred.

The determination regarding responsibility becomes final either on the date that the Institute provides the parties with the written determination of the result of any appeal, or, if no party appeals, the date on which an appeal would no longer be considered timely.

9. Sanctions and Other Remedies

The decisionmaker shall be responsible for imposing sanctions that are:

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

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

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

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

- Reprimand/warning;
- Changing the respondent's academic schedule;
- Disciplinary probation;
- Restricting access to Institute facilities or activities;
- Community service;
- Issuing a "no contact" order to the respondent or requiring that such an order remain in place;
- Dismissal or restriction from Institute employment;
- Suspension (limited time or indefinite); and
- Expulsion.

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

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

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

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

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

10. Appeals

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

1. A procedural irregularity that would change the outcome;
2. New evidence that would change the outcome and that was not reasonably available when the determination or dismissal was made; and
3. The Title IX Coordinator, investigator, or decisionmaker had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that would change the outcome.

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

If a party appeals a dismissal or determination whether sex-based harassment occurred, the Institute will:

- Notify the parties in writing of any appeal, including notice of the allegations, if notice was not previously provided to the respondent;
- Implement appeal procedures equally for the parties;
- Ensure that the decisionmaker for the appeal did not take part in an investigation of the allegations or dismissal of the complaint;
- Ensure that the decisionmaker for the appeal has been trained consistent with the Title IX regulations;
- Communicate to the parties in writing that the Institute will provide the parties a reasonable and equal opportunity to make a statement in support of, or challenging, the outcome; and
- Notify the parties in writing of the result of the appeal and the rationale for the result.

The appealing party must submit the appeal in writing to the Title IX Coordinator within seven calendar days after receiving the written determination regarding responsibility. If either the complainant or respondent submits an appeal, the Title IX Coordinator will notify the other that an appeal has been filed and the grounds of the appeal. The non-appealing party may submit a written response within seven days after notice of an appeal.

If on appeal the Institute concludes that a change in the decisionmaker's determination is warranted, the Institute may enter a revised determination or return the matter for additional investigation. If both the complainant and respondent appeal, the appeals will be considered concurrently.

The decision maker will issue a written decision describing the result of the appeal and the rationale for the result, and

provide the written decision simultaneously to both parties. Appeals decisions will be rendered within 15 calendar days after the receipt of the written appeal. All appeal decisions are final.

11. Records Disclosure & Recordkeeping

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

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

Additional information about FERPA can be found on the Institute's website at www.avedapdx.com.

The Institute will, upon written request, disclose to the alleged victim of a crime of violence (as that term is defined in Section 16 of Title 18, United States Code), or a non-forcible sex offense, a report on the results of any disciplinary proceeding conducted by the Institute against a student who is the alleged perpetrator of such crime or offense. If the alleged victim is deceased as a result of such crime or offense, the next of kin of such victim shall be treated as the alleged victim for purposes of this paragraph.

The Institute will maintain for a period of not less than seven years records of:

- a) Any actions, including any supportive measures, taken in response to a report or complaint of sex-based harassment
- b) Each sex-based harassment investigation including any determination regarding responsibility and any audio or audiovisual recording or transcript from a hearing conducted in response to a complaint, any disciplinary sanctions imposed on the respondent, and any remedies provided to the complainant designed to restore or preserve equal access to the Institute's education programs or activities;
- c) Any appeal and the result therefrom;
- d) Any informal resolution and the result therefrom; and
- e) All materials used to train Title IX Coordinators, investigators, decisionmakers, and any person who facilitates an informal resolution process. The Institute will make these training materials available upon request by members of the public.

13. Education and Prevention Programs

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

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

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

Definitions of Sex-Based Harassment under State Law
Washington Law:

The Revised Code of Washington (“RCW”) provides the following definitions with respect to crimes of sexual assault and consent:

(1) “Sexual intercourse” (a) has its ordinary meaning and occurs upon any penetration, however slight, and (b) Also means any penetration of the vagina or anus however slight, by an object, when committed on one person by another, whether such persons are of the same or opposite sex, except when such penetration is accomplished for medically recognized treatment or diagnostic purposes, and (c) Also means any act of sexual contact between persons involving the sex organs of one person and the mouth or anus of another whether such persons are of the same or opposite sex.

(2) “Sexual contact” means any touching of the sexual or other intimate parts of a person done for the purpose of gratifying sexual desire of either party or a third party.

(6) “Forcible compulsion” means physical force which overcomes resistance, or a threat, express or implied, that places a person in fear of death or physical injury to herself or himself or another person, or in fear that she or he or another person will be kidnapped.

(7) “Consent” means that at the time of the act of sexual intercourse or sexual contact there are actual words or conduct indicating freely given agreement to have sexual intercourse or sexual contact.

RCW 9A.44.040 – Rape in the first degree.

(1) A person is guilty of rape in the first degree when such person engages in sexual intercourse with another person by forcible compulsion where the perpetrator or an accessory:

(a) Uses or threatens to use a deadly weapon or what appears to be a deadly weapon; or

(b) Kidnaps the victim; or

(c) Inflicts serious physical injury, including but not limited to physical injury which renders the victim unconscious; or

(d) Feloniously enters into the building or vehicle where the victim is situated.

RCW 9A.44.050 – Rape in the second degree.(1) A person is

guilty of rape in the second degree when, under circumstances not constituting rape in the first degree, the person engages in sexual intercourse with another person:

(a) By forcible compulsion;

(b) When the victim is incapable of consent by reason of being physically helpless or mentally incapacitated;

(c) When the victim is a person with a developmental disability and the perpetrator is a person who is not married to the victim and who:

(i) Has supervisory authority over the victim; or

(ii) Was providing transportation, within the course of his or her employment, to the victim at the time of the offense.

RCW 9A.44.060 – Rape in the third degree.

(1) A person is guilty of rape in the third degree when, under circumstances not constituting rape in the first or second degrees, such person engages in sexual intercourse with another person:

(a) Where the victim did not consent as defined in RCW 9A.44.010(7), to sexual intercourse with the perpetrator; or

(b) Where there is threat of substantial unlawful harm to property rights of the victim.

RCW 9A.44.100 – Indecent liberties.

(1) A person is guilty of indecent liberties when he or she knowingly causes another person to have sexual contact with him or her or another:

(a) By forcible compulsion;

(b) When the other person is incapable of consent by reason of being mentally defective, mentally incapacitated, or physically helpless;

(c) When the victim is a person with a developmental disability and the perpetrator is a person who is not married to the victim and who:

(i) Has supervisory authority over the victim; or

(ii) Was providing transportation, within the course of his or her employment, to the victim at the time of the offense;

The Revised Code of Washington defines Stalking as follows:

RCW 9A.46.110 – Stalking.

(1) A person commits the crime of stalking if, without lawful authority and under circumstances not amounting to a felony attempt of another crime:

(a) He or she intentionally and repeatedly harasses or repeatedly follows another person; and

(b) The person being harassed or followed is placed in fear that the stalker intends to injure the person, another person, or property of the person or of another person. The feeling of fear must be one that a reasonable person in the same situation would experience under all the circumstances; and

(c) The stalker either:

(i) Intends to frighten, intimidate, or harass the person; or

(ii) Knows or reasonably should know that the person is afraid, intimidated, or harassed even if the stalker did not intend to place the person in fear or intimidate or harass the person.

(4) ***. Contact” includes, in addition to any other form of contact or communication, the sending of an electronic communication to the person.

(6) As used in this section:

(b) “Follows” means deliberately maintaining visual or physical proximity to a specific person over a period of time. A finding that the alleged stalker repeatedly and deliberately appears at the person’s home, school, place of employment, business, or any other location to maintain visual or physical proximity to the person is sufficient to find that the alleged stalker follows the person. It is not necessary to establish that the alleged stalker follows the person while in transit from one location to another.

(e) “Repeatedly” means on two or more separate occasions.

RCW 9.61.260 – Cyberstalking.

(1) A person is guilty of cyberstalking if he or she, with intent to harass, intimidate, torment, or embarrass any other person, and under circumstances not constituting telephone harassment, makes an electronic communication to such other person or a third party:

(a) Using any lewd, lascivious, indecent, or obscene words, images, or language, or suggesting the commission of any lewd or lascivious act;

(b) Anonymously or repeatedly whether or not conversation occurs; or

(c) Threatening to inflict injury on the person or property of the person called or any member of his or her family or household.

(4) Any offense committed under this section may be deemed to have been committed either at the place from which the communication was made or at the place where the communication was received.

(5) For purposes of this section, “electronic communication” means the transmission of information by wire, radio, optical cable, electromagnetic, or other similar means. “Electronic communication” includes, but is not limited to, electronic mail, internet-based communications, pager service, and electronic text messaging.

The Revised Code of Washington provides the following definitions with respect to Domestic Violence and Dating Violence:

RCW 26.50.010 – Definitions.

As used in this chapter, the following terms shall have the meanings given them:

(2) “Dating relationship” means a social relationship of a romantic nature. Factors that the court may consider in making this determination include: (a) The length of time the relationship has existed; (b) the nature of the relationship; and (c) the frequency of interaction between the parties.

(3) “Domestic violence” means: (a) Physical harm, bodily injury, assault, or the infliction of fear of imminent physical harm, bodily injury or assault, sexual assault, or stalking as defined in RCW 9A.46.110 of one intimate partner by another

intimate partner; or (b) physical harm, bodily injury, assault, or the infliction of fear of imminent physical harm, bodily injury or assault, sexual assault, or stalking as defined in RCW 9A.46.110 of one family or household member by another family or household member.

(6) "Family or household members" means: (a) Adult persons related by blood or marriage; (b) adult persons who are presently residing together or who have resided together in the past; and (c) persons who have a biological or legal parent-child relationship, including stepparents and stepchildren and grandparents and grandchildren.

Oregon Law:

Oregon law provides the following definitions with respect to crimes of sexual assault and consent:

ORS 163.355

Rape in the third degree

- (1) A person commits the crime of rape in the third degree if the person has sexual intercourse with another person under 16 years of age.
- (2) Rape in the third degree is a Class C felony.

ORS 163.365

Rape in the second degree

- (1) A person who has sexual intercourse with another person commits the crime of rape in the second degree if the other person is under 14 years of age.
- (2) Rape in the second degree is a Class B felony.

ORS 163.375

Rape in the first degree

- (1) A person who has sexual intercourse with another person commits the crime of rape in the first degree if:
 - (a) The victim is subjected to forcible compulsion by the person;
 - (b) The victim is under 12 years of age;
 - (c) The victim is under 16 years of age and is the person's sibling, of the whole or half blood, the person's child or the person's spouse's child; or
 - (d) The victim is incapable of consent by reason of mental defect, mental incapacitation or physical helplessness.
- (2) Rape in the first degree is a Class A felony.

ORS 163.305

Definitions

As used in chapter 743, Oregon Laws 1971, unless the context requires otherwise:

- (1) "Forcible compulsion" means to compel by:
 - (a) Physical force; or

(7) "Intimate partner" means: (a) Spouses, or domestic partners; (b) former spouses, or former domestic partners; (c) persons who have a child in common regardless of whether they have been married or have lived together at any time; (d) adult persons presently or previously residing together who have or have had a dating relationship; (e) persons sixteen years of age or older who are presently residing together or who have resided together in the past and who have or have had a dating relationship; and (f) persons sixteen years of age or older with whom a person sixteen years of age or older has or has had a dating relationship.

(b) A threat, express or implied, that places a person in fear of immediate or future death or physical injury to self or another person, or in fear that the person or another person will immediately or in the future be kidnapped.

(2) "Mentally defective" means that a person suffers from a qualifying mental disorder that renders the person incapable of appraising the nature of the conduct of the person.

(3) "Mentally incapacitated" means that a person is rendered incapable of appraising or controlling the conduct of the person at the time of the alleged offense.

(4) "Oral or anal sexual intercourse" means sexual conduct between persons consisting of contact between the sex organs of one person and the mouth or anus of another.

(5) "Physically helpless" means that a person is unconscious or for any other reason is physically unable to communicate unwillingness to an act.

(6) "Sexual contact" means any touching of the sexual or other intimate parts of a person or causing such person to touch the sexual or other intimate parts of the actor for the purpose of arousing or gratifying the sexual desire of either party.

(7) "Sexual intercourse" has its ordinary meaning and occurs upon any penetration, however slight; emission is not required.

Oregon law provides the following definitions with respect to crime of stalking:

ORS 163.732

- (1) A person commits the crime of stalking if:
 - (a) The person knowingly alarms or coerces another person or a member of that person's immediate family or household by engaging in repeated and unwanted contact with the other person;

(b) It is objectively reasonable for a person in the victim's situation to have been alarmed or coerced by the contact; and

(c) The repeated and unwanted contact causes the victim reasonable apprehension regarding the personal safety of the victim or a member of the victim's immediate family or household.

(2)(a) Stalking is a Class A misdemeanor.

(b) Notwithstanding paragraph (a) of this subsection, stalking is a Class C felony if the person has a prior conviction for:

(A) Stalking; or

(B) Violating a court's stalking protective order.

ORS 163.730

Definitions for ORS 30.866 and 163.730 to 163.750

(1) "Alarm" means to cause apprehension or fear resulting from the perception of danger.

(2) "Coerce" means to restrain, compel or dominate by force or threat.

(3) "Contact" includes but is not limited to:

(a) Coming into the visual or physical presence of the other person;

(b) Following the other person;

(c) Waiting outside the home, property, place of work or school of the other person or of a member of that person's family or household;

(d) Sending or making written or electronic communications in any form to the other person;

(e) Speaking with the other person by any means;

(f) Communicating with the other person through a third person;

(g) Committing a crime against the other person;

(h) Communicating with a third person who has some relationship to the other person with the intent of affecting the third person's relationship with the other person;

(i) Communicating with business entities with the intent of affecting some right or interest of the other person;

(j) Damaging the other person's home, property, place of work or school;

(k) Delivering directly or through a third person any object to the home, property, place of work or school of the other person; or

(L) Service of process or other legal documents unless the other person is served as provided in ORCP 7 or 9.

(4) "Household member" means any person residing in the

same residence as the victim.

(5) "Immediate family" means father, mother, child, sibling, spouse, grandparent, stepparent and stepchild.

Oregon law provides the following definitions with respect to domestic violence and dating violence:

ORS 135.230¹

Definitions for ORS 135.230 to 135.290

As used in ORS 135.230 (Definitions for ORS 135.230 to 135.290) to 135.290 (Punishment by contempt of court), unless the context requires otherwise:

(1) "Abuse" means:

(a) Attempting to cause or intentionally, knowingly or recklessly causing physical injury;

(b) Intentionally, knowingly or recklessly placing another in fear of imminent serious physical injury; or

(c) Committing sexual abuse in any degree as defined in ORS 163.415 (Sexual abuse in the third degree), 163.425 (Sexual abuse in the second degree) and 163.427 (Sexual abuse in the first degree).

* * *

(3) "Domestic violence" means abuse between family or household members.

(4) "Family or household members" means any of the following:

(a) Spouses.

(b) Former spouses.

(c) Adult persons related by blood or marriage.

(d) Persons cohabiting with each other.

(e) Persons who have cohabited with each other or who have been involved in a sexually intimate relationship.

(f) Unmarried parents of a minor child.

ORS 90.100

Definitions

(7) "Domestic violence" means:

(a) Abuse between family or household members, as those terms are defined in ORS 107.705 (Definitions for ORS 107.700 to 107.735); or

(b) Abuse, as defined in ORS 107.705 (Definitions for ORS 107.700 to 107.735), between partners in a dating relationship.

Bystander Intervention

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

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

Risk Reduction

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

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

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

Safety Planning. Things to think about:

- How to get away if there is an emergency? Be conscious of exits or other escape routes. Think about options for transportation (car, bus, subway, etc.).
- Who can help? Friends and/or family, or support centers in your area. Please see Section 4 of this Policy for a list of support organizations.
- Where to go? Options may include a friend's or relative's house, or you may consider going to a domestic violence or homeless shelter. You may also go to the police. **Important Safety Note:** If the dangerous situation involves a partner, go to the police or a shelter first.
- What to bring? This may include important papers and documents such as a birth certificate, social security card, license, passport, medical records, lease, bills, etc. This will also include house keys, car keys, cash, credit cards, medicine, important numbers, and your cell phone. If you are bringing children with you, remember to bring their important papers and legal documents. You can keep all of these things in an emergency bag. You should hide the bag—it is best if it is not in your house or car. If the bag is discovered, you can call it a "tornado" or "fire" bag.

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

- **Distract.** If you see a friend in a situation that doesn't feel quite right, create a distraction to get your friend to safety. This can be as simple as joining or redirecting the conversation: suggest to your friend that you leave the

party, or ask them to walk you home. Try asking questions like: “Do you want to head to the bathroom with me?” or “Do you want to head to another party – or grab pizza?”

- Step in. If you see someone who looks uncomfortable or is at risk, step in. If you feel safe, find a way to de-escalate the situation and separate all parties involved. Don't be shy about directly asking the person if they need help or if they feel uncomfortable.
- Enlist others. You don't have to go it alone. Call in friends or other people in the area as reinforcements to help defuse a dangerous situation and get the at-risk person home safely. There is safety in numbers.
- Keep an eye out. Use your eyes and ears to observe your surroundings. If you see someone who has had too much to drink or could be vulnerable, try to get them to a safe place. Enlist friends to help you. Even if you weren't around when the assault occurred, you can still support a friend in the aftermath.

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

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

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

13. Amendments

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

AVEDA INSTITUTE PORTLAND AND AVEDA INSTITUTE PORTLAND VANCOUVER CAMPUS
Sex-Based Harassment Policy & Grievance Procedures

Definitions of Key Terms

Complainant means:

- 1) A student or employee who is alleged to have been subjected to conduct that could constitute sex discrimination under Title IX or its regulations; or
- 2) A person other than a student or employee who is alleged to have been subjected to conduct that could constitute sex discrimination under Title IX or its regulations and who was participating or attempting to participate in the Institute's education program or activity at the time of the alleged sex discrimination.

Complaint means an oral or written request to the Institute that objectively can be understood as a request for the Institute to investigate and make a determination about alleged discrimination under Title IX or its regulations.

Disciplinary sanctions means consequences imposed on a respondent following a determination under Title IX that the respondent violated the Institute's prohibition on sex discrimination.

Party means a complainant or respondent.

Relevant means related to the allegations of sex discrimination under investigation as part of these grievance procedures. Questions are relevant when they seek evidence that may aid in showing whether the alleged sex discrimination occurred, and evidence is relevant when it may aid a decisionmaker in determining whether the alleged sex discrimination occurred.

Remedies means measures provided, as appropriate, to a complainant or any other person the Institute identifies as having had their equal access to the Institute's education program or activity limited or denied by sex discrimination. These measures are provided to restore or preserve that person's access to the Institute's education program or activity after the Institute determines that sex discrimination occurred.

Respondent means a person who is alleged to have violated the Institute's prohibition on sex discrimination.

Retaliation means intimidation, threats, coercion, or discrimination against any person by the Institute, a student, or an employee or other person authorized by the Institute to provide aid, benefit, or service under the Institute's education program or activity, for the purpose of interfering with any right or privilege secured by Title IX or its regulations, or because the person has reported information, made a complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing under the Title IX regulations.

Sex-based harassment is a form of sex discrimination and means sexual harassment and other harassment on the basis of sex, including on the basis of sex stereotypes, sex characteristics, pregnancy or related conditions, sexual orientation, and gender identity, that is:

- 1) Quid pro quo harassment. An employee, agent, or other person authorized by the Institute to provide an aid, benefit, or service under the Institute's education program or activity explicitly or impliedly conditioning the provision of such an aid, benefit, or service on a person's participation in unwelcome sexual conduct;
- 2) Hostile environment harassment. Unwelcome sex-based conduct that, based on the totality of the circumstances, is subjectively and objectively offensive and is so severe or pervasive that it limits or denies a person's ability to participate in or benefit from the Institute's education program or activity (*i.e.*, creates a hostile environment). Whether a hostile environment has been created is a fact-specific inquiry that includes consideration of the following:

- (i) The degree to which the conduct affected the complainant's ability to access the Institute's education program or activity;
 - (ii) The type, frequency, and duration of the conduct;
 - (iii) The parties' ages, roles within the Institute's education program or activity, previous interactions, and other factors about each party that may be relevant to evaluating the effects of the conduct;
 - (iv) The location of the conduct and the context in which the conduct occurred; and
 - (v) Other sex-based harassment in the Institute's education program or activity; or
- 3) Specific offenses.
- (i) Sexual assault meaning an offense classified as a forcible or nonforcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation;
 - (ii) Dating violence meaning 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:
 - 1. The length of the relationship;
 - 2. The type of relationship; and
 - 3. The frequency of interaction between the persons involved in the relationship;
 - (iii) Domestic violence meaning felony or misdemeanor crimes committed by a person who:
 - A. Is a current or former spouse or intimate partner of the victim under the family or domestic violence laws of the jurisdiction of the Institute, or a person similarly situated to a spouse of the victim;
 - B. Is cohabitating, or has cohabitated, with the victim as a spouse or intimate partner;
 - C. Shares a child in common with the victim; or
 - D. Commits acts against a youth or adult victim who is protected from those acts under the family or domestic violence laws of the jurisdiction; or
 - (iv) Stalking meaning engaging in a course of conduct directed at a specific person that would cause a reasonable person to:
 - A. Fear for the person's safety or the safety of others; or
 - B. Suffer substantial emotional distress.

Consent - is a voluntary agreement to engage in sexual activity.

- Past consent does not imply future consent.
- Silence or an absence of resistance does not imply consent.
- Consent to engage in sexual activity with one person does not imply consent to engage in sexual activity with another.
- Consent can be withdrawn at any time.
- Coercion, force, or threat of either invalidates consent.

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

Supportive measures means individualized measures offered as appropriate, as reasonably available, without unreasonably burdening a complainant or respondent, not for punitive or disciplinary reasons, and without fee or charge to the complainant or respondent to:

- 1) Restore or preserve that party's access to the Institute's education program or activity, including measures that are designed to protect the safety of the parties or the Institute's educational environment; or
- 2) Provide support during the Institute's grievance procedures or during an informal resolution process.

Registered Sex Offenders

The Campus Sex Crimes Prevention Act (CSCPA) of 2000 is a federal law that provides for the tracking of convicted sex offenders enrolled at, or employed at, institutions of higher education. The CSCPA is an amendment to the Jacob Wetterling Crimes Against Children and Sexually Violent Offender Act. The federal law requires law enforcement agencies to provide schools with a list of registered sex offenders who have indicated that they are either enrolled, employed, or carrying on a vocation. The CSCPA further amends the Family Education Rights and Privacy Act of 1974 (FERPA) to clarify that nothing in the Act can prohibit an educational institution from disclosing information provided to the institution concerning registered sex offenders.

In addition, a list of all registered sex offenders in Oregon and Washington is available to all members of the community.

- o Oregon: To get information specifically regarding registered sex offenders, please reference the Oregon Sex Offenders Inquiry Systems at <http://sexoffenders.oregon.gov/>
- o Washington: To get information specifically regarding registered sex offenders, please reference the Washington Association of Sheriffs and Police Chiefs Sex Offender website at <http://www.icrimewatch.net/washington.php> or the City of Vancouver Sex Offenders page at <https://www.cityofvancouver.us/police/page/vancouver-sex-offenders>.

Crime Statistics

**Public Property is defined as all public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus. For the purpose of reporting, public property numbers are reflective of approximately .2 miles in circumference around the school – this is the approximate distance from the building to sidewalks. Crime records do not reflect distances in the instance of rape; numbers reported under this category are reflective of a ½ mile circumference around the school.*

Aveda Institute Portland

Criminal Offenses:

Criminal Offenses - On Campus			
	2021	2022	2023
Murder/Non-Negligent Manslaughter	0	0	0
Negligent Manslaughter	0	0	0
Sex Offenses - Forcible	0	0	0
Rape	0	0	0
Fondling	0	0	0
Sex Offenses - Non-Forcible	0	0	0
Incest	0	0	0
Statutory Rape	0	0	0
Robbery	0	0	0
Aggravated Assault	1	0	0
Burglary	0	0	0
Motor Vehicle Theft	0	0	0
Arson	0	0	0
Criminal Offenses - Public Property			
	2021	2022	2023
Murder/Non-Negligent Manslaughter	0	0	0
Negligent Manslaughter	0	0	0
Sex Offenses - Forcible	0	0	0
Rape	0	0	0
Fondling	0	0	0
Sex Offenses - Non-Forcible	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

Hate Crimes:

Hate Crimes - On Campus									
Category of Bias for Crimes reported in 2023									
	2023 total	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalism of property	0	0	0	0	0	0	0	0	0

Hate Crimes - On Campus									
Category of Bias for Crimes reported in 2022									
	2022 total	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalism of property	0	0	0	0	0	0	0	0	0

Hate Crimes - On Campus									
	Category of Bias for Crimes reported in 2021								
	2021 total	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalism of property	0	0	0	0	0	0	0	0	0

Hate Crimes – Public Property									
Category of Bias for Crimes reported in 2023									
	2023 total	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalism of property	0	0	0	0	0	0	0	0	0

Hate Crimes – Public Property									
Category of Bias for Crimes reported in 2022									
	2022 total	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalism of property	0	0	0	0	0	0	0	0	0

Hate Crimes – Public Property									
Category of Bias for Crimes reported in 2021									
	2021 total	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalism of property	0	0	0	0	0	0	0	0	0

VAWA Offenses:

VAWA Offenses – On Campus			
Crime	2021	2022	2023
Domestic Violence	0	0	0
Dating Violence	0	0	0
Stalking	0	0	0

VAWA Offenses – Public Property			
Crime	2021	2022	2023
Domestic Violence	0	0	0
Dating Violence	0	0	0
Stalking	0	0	0

Arrests:

Arrests - On Campus			
Crime	2021	2022	2023
Weapons: carrying, possessing, etc.	0	0	0
Drug Abuse violations	0	0	0
Liquor Law violations	0	0	0

Arrests - Public Property			
Crime	2021	2022	2023
Weapons: carrying, possessing, etc.	0	0	0
Drug Abuse violations	0	0	0
Liquor Law violations	0	0	0

Disciplinary Actions:

Disciplinary Actions - On Campus			
Crime	2021	2022	2023
Weapons: carrying, possessing, etc.	0	0	0
Drug Abuse violations	0	0	0
Liquor Law violations	0	0	0

Disciplinary Actions - Public Property			
Crime	2021	2022	2023
Weapons: carrying, possessing, etc.	0	0	0
Drug Abuse violations	0	0	0
Liquor Law violations	0	0	0

Unfounded Crimes:

Unfounded Crimes	2021	2022	2023
Total Unfounded Crimes	0	0	0

Aveda Institute Portland Vancouver Campus**Criminal Offenses:**

Criminal Offenses - On Campus			
	2021	2022	2023
Murder/Non-Negligent Manslaughter	0	0	0
Negligent Manslaughter	0	0	0
Sex Offenses - Forcible	0	0	0
Rape	0	0	0
Fondling	0	0	0
Sex Offenses - Non-Forcible	0	0	0
Incest	0	0	0
Statutory Rape	0	0	0
Robbery	0	0	0
Aggravated Assault	0	0	0
Burglary	0	2	1
Motor Vehicle Theft	0	0	0
Arson	0	0	0
Criminal Offenses - Public Property			
	2021	2022	2023
Murder/Non-Negligent Manslaughter	0	0	0
Negligent Manslaughter	0	0	0
Sex Offenses - Forcible	0	0	0

Rape	0	0	0
Fondling	0	0	0
Sex Offenses - Non-Forcible	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

Hate Crimes:

Hate Crimes - On Campus									
	Category of Bias for Crimes reported in 2023								
	2023 total	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalism of property	0	0	0	0	0	0	0	0	0

Hate Crimes - On Campus									
	Category of Bias for Crimes reported in 2022								
	2022 total	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0

Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalism of property	0	0	0	0	0	0	0	0	0
Hate Crimes - On Campus									
Category of Bias for Crimes reported in 2021									
	2021 total	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalism of property	0	0	0	0	0	0	0	0	0

Hate Crimes – Public Property									
Category of Bias for Crimes reported in 2023									
	2023 total	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalism of property	0	0	0	0	0	0	0	0	0

Hate Crimes – Public Property									
Category of Bias for Crimes reported in 2022									
	2022 total	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalism of property	0	0	0	0	0	0	0	0	0

Hate Crimes – Public Property									
Category of Bias for Crimes reported in 2021									
	2021 total	Race	Religion	Sexual Orientation	Gender	Gender Identity	Disability	Ethnicity	National Origin
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
Simple Assault	0	0	0	0	0	0	0	0	0
Larceny-Theft	0	0	0	0	0	0	0	0	0
Intimidation	0	0	0	0	0	0	0	0	0
Destruction/damage/vandalism of property	0	0	0	0	0	0	0	0	0

VAWA Offenses:

VAWA Offenses – On Campus			
Crime	2021	2022	2023
Domestic Violence	0	0	0
Dating Violence	0	0	0
Stalking	0	0	0

VAWA Offenses – Public Property			
Crime	2021	2022	2023
Domestic Violence	0	0	0
Dating Violence	0	0	0
Stalking	0	0	0

Arrests:

Arrests - On Campus			
Crime	2021	2022	2023
Weapons: carrying, possessing, etc.	0	0	0
Drug Abuse violations	0	0	0
Liquor Law violations	0	0	0

Arrests - Public Property			
Crime	2021	2022	2023
Weapons: carrying, possessing, etc.	0	0	0
Drug Abuse violations	0	0	0
Liquor Law violations	0	0	0

Disciplinary Actions:

Disciplinary Actions - On Campus			
Crime	2021	2022	2023
Weapons: carrying, possessing, etc.	0	0	0
Drug Abuse violations	0	0	0
Liquor Law violations	0	0	0

Disciplinary Actions - Public Property			
Crime	2021	2022	2023
Weapons: carrying, possessing, etc.	0	0	0
Drug Abuse violations	0	0	0
Liquor Law violations	0	0	0

Unfounded Crimes:

Unfounded Crimes	2021	2022	2023
Total Unfounded Crimes	0	0	0

Appendix A - Crime Definitions

These definitions conform to the requirements of the implementing regulations of the Clery Act (ref. 34 CFR 668.46 (c)(7)).

Murder and non-negligent manslaughter – the willful (non-negligent) killing of one human being by another.

Negligent manslaughter – the killing of another person through gross negligence.

Forcible Sex Offenses – The carnal knowledge of a 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 because of his or her temporary or permanent mental or physical incapacity (or because of his or her youth).

Forcible Sodomy – Oral or anal sexual intercourse with another person, forcibly and/or against that person’s will; or not forcibly against the person’s will, where the victim is incapable of giving consent because his or her youth or because of his or her temporary or permanent mental or physical incapacity.

Sexual Assault with an object – The use of an object or instrument to unlawfully penetrate, however slightly, the genital or anal opening of the body of another person, forcibly and/or against that person’s will; or not forcibly against the person’s will, where the victim is incapable of giving consent because his or her youth or because of his or her temporary or permanent mental or physical incapacity.

Forcible Fondling - The touching of the private body parts of another person for the purpose of sexual gratification, forcibly and/or against that person’s will; or not forcibly against the person’s will, where the victim is incapable of giving consent because his or her youth or because of his or her temporary or permanent mental or physical incapacity

Consent – Consent is a free and clearly given yes, not the absence of no and cannot be received when a person is incapacitated by alcohol or drugs.

Incapacity to Consent – A person is considered incapable of consenting to sexual act if the person is: under 18 years of age, mentally defective, mentally incapacitate, or physically helpless. A lack of verbal or physical resistance does not, by itself, constitute consent but may be considered by the trier of fact along with all other relevant evidence. [1971. C743 S105; 1999 c.949 S2; 2001 c104 S52]

[Note: The Violence Against Women Act specified the term, “sexual assault” to mean: An offense that meets the definition of rape, fondling, incest or statutory rape as used in the Uniform Crime Reporting System of the Federal Bureau of Investigation.]

Incest – Non-forcible sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

Statutory Rape – Non-forcible sexual intercourse with a person who is under the statutory age of consent.

Rape – The penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by a sex organ or another person, without consent of the victim.

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

Aggravated Assault – an unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by a 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 that could and probably would result in serious personal injury if the crime were successfully completed. Aggravated assaults include poisoning.

Burglary – The unlawfully entry of a structure to commit a felony or a theft. For reporting purposes, this definition includes unlawfully entry with intent to commit a larceny or a felony, breaking and entering with intent to commit a larceny, housebreaking, safecracking, and all attempts to commit any of the aforementioned acts.

Motor Vehicle Theft – The 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.

Hate Crime – The Clery Act requires the separate reporting, by category of prejudice, of any crime reported in the classifications above and any other crime involving bodily injury that manifests evidence that the victim was intentionally selected because of the victim's actual or perceived race; gender; gender identity; religion; sexual orientation; ethnicity; national origin or disability.

Domestic Violence – Abuse between family or household members. Family or Household members includes spouses or former spouses; adults related by blood, marriage, or adoption; persons cohabitation or who have cohabitated; persons in past or present sexually intimate relationships; unmarried parents of a child.

Abuse – The occurrence of one or more of the following acts within domestic or dating relationship: attempting to cause or intentionally, knowingly or recklessly causing bodily injury; intentionally, knowingly, or recklessly placing another in fear of imminent bodily injury; causing another to engage in involuntary sexual relations by force or threat of force.

Dating Violence – A pattern of behavior in any relationship that is used to gain or maintain power and control over an intimate partner. Abuse can be physical, sexual, emotional, economic or psychological acts or threats of actions that influence another person. This includes any behaviors that frighten, intimidate, terrorize, manipulate, hurt, humiliate, blame or injure someone. Dating violence is defined as violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of the interaction between the persons involved in the relationship. For the purpose of this definition dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. Dating violence does not include acts covered under the definition of domestic violence. For the purposes of complying with the requirements of this section and section 668.41, any incident meeting this definition is considered a crime for the purposes of Clery Act reporting.

Stalking – the repetitive and/or menacing pursuit, following, harassment and/or interference with the peace and/or safety of a member of the community, or the safety of any of the immediate family members of the community. Stalking is unpredictable and dangerous. A person commits the crime of stalking if: the person knowingly alarms or coerces another person or a member of that person's immediate family or household by engaging in repeated and unwanted contact with the other person; it is objectively reasonable for a person in the victim's situation to have been alarmed or coerced by the contact; and the repeated and unwanted contact causes the victim reasonable apprehension regarding the person safety of the victim or a member of the victim's immediate family or household.

Liquor Law Violations – Violations of laws or ordinances prohibiting: the manufacture, sale, transporting, furnishing, possessing of intoxicating liquor; maintain unlawful drinking places; furnishing liquor to a minor or intemperate person; using a vehicle for illegal transportation of liquor; drinking on a train or public conveyance; and all attempts to commit any of the aforementioned activities. (Drunkenness and driving under the influence are not included in this definition)

Drug Abuse Violations – Violations of state and local laws relating to the unlawful possession, sale, use, growing, manufacturing, and making of narcotic drugs. The relevant substances include opium or cocaine and their derivatives

(morphine, heroin, codeine); marijuana; synthetic narcotics (Demerol, methadone); and dangerous non-narcotic drugs (barbiturates, Benzedrine)

Weapon Law Violations – Violations of laws or ordinances dealing with weapon offenses, regulatory in nature, such as: the manufacture, sale, or possession of deadly weapons; the carrying of deadly weapons, concealed or openly; the furnishing of deadly weapons to minors; aliens possessing deadly weapons; and all attempts to commit any of the aforementioned acts.

Unfounded Crimes – An institution may withhold, or subsequently remove, a reported crime from its crime statistics in the rare situations where sworn or commissioned law enforcement personnel have fully investigated the reported crime and, based on the results of this investigation and evidence, have made a formal determination that the crime report is false or caseless and therefore “unfounded”. Only sworn or commissioned law enforcement personnel may “unfound” a crime report for purposes of reporting under this section. The recovery of stolen property, the low value of stolen property, the refusal of the victim to cooperate with the prosecution, and the failure to make an arrest do not “unfound” a crime report.

ANNUAL SECURITY REPORT

AVEDA INSTITUTE PORTLAND AND AVEDA INSTITUTE PORTLAND VANCOUVER CAMPUS

September 30, 2024

I acknowledge receipt of a copy of the Aveda Institute Portland and Aveda Institute Portland Vancouver Campus Annual Security Report. I understand it is my responsibility to read this document.

Printed Name

Date

Signature

Date

If a prospective student is under 18 years of age at the time of application, a parent signature is also required.

Parent Printed Name (if student is under 18)

Date

Parent Signature (if student is under 18)

Date

Portland Campus - 325 NW 13th Avenue, Portland, OR 97209 - 503-294-6000
Vancouver Campus - 6615 NE Fourth Plain Boulevard, Vancouver, WA 98661 - 360-326-0567