

**SOHO HAIR ACADEMY
IOWA CAMPUS
ANNUAL SECURITY REPORT (ASR)
SEXUAL MISCONDUCT PREVENTION AND RESPONSE POLICY**

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1. SEXUAL MISCONDUCT PREVENTION AND RESPONSE POLICY

Institutional Commitment

SOHO Hair Academy is committed to maintaining an educational and working environment free from sex discrimination, sexual harassment, sexual assault, domestic violence, dating violence, stalking, sexual exploitation, retaliation, and other forms of sexual misconduct.

These protections apply to all students, employees, applicants, visitors, vendors, and participants in academy-sponsored education programs and activities, regardless of sex, sexual orientation, gender identity, or gender expression.

SOHO Hair Academy complies with:

- Title IX of the Education Amendments of 1972
- The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act)
- Violence Against Women Reauthorization Act (VAWA) / Campus SaVE Act
- Applicable Iowa and state laws

Contact Information

Somer Krueger, President
Courtney Holiday, CSA (Campus Security Authority) and Title IX Coordinator

2600 South 9th Street
Council Bluffs, IA 51501
712-328-2613

2. REPORTING OPTIONS & CONFIDENTIALITY

Reporting to Responsible Employees (Mandatory Reporters)

All staff members of SOHO Hair Academy are designated as **Responsible Employees**.

- **Obligation to Report:** Before a claimant or witness reveals information to a staff member, they should understand that Responsible Employees are required to report all relevant details (including names of parties involved, dates, times, and locations) to the Title IX Coordinator.
- **Information Handling:** Information reported to a Responsible Employee will only be shared with institutional personnel responsible for handling the Academy's response. Responsible Employees will not share information with law enforcement without the claimant's consent unless law enforcement is independently involved.
- **Evidentiary Standard:** SOHO Hair Academy utilizes the Preponderance of the Evidence standard (*i.e., it is more likely than not that the misconduct occurred*) in all administrative investigations and disciplinary proceedings regarding alleged sexual assault, domestic violence, dating violence, stalking, and sexual harassment. This standard applies uniformly to all formal complaints of sexual misconduct, whether involving students, faculty, or staff.

Institutional Requests for Confidentiality

If a claimant discloses an incident to a Responsible Employee but requests confidentiality or asks that no investigation/disciplinary action take place, the Title IX Coordinator (Courtney Holiday) must weigh the request against the academy's legal obligation to provide a safe, non-discriminatory environment.

Evaluating Factors Include:

- Increased risk of repeat offenses by the alleged perpetrator (e.g., prior complaints, threats of violence).
- Perpetration involving multiple perpetrators or weapons.
- Minor status of the claimant.
- Availability of independent evidence (e.g., security camera footage, physical evidence).
- Patterns of perpetration at a specific location or via drug/alcohol facilitation.

If SOHO Academy determines it cannot honor a confidentiality request, it will inform the claimant prior to starting an investigation and will, to the extent possible, only share information with people responsible for handling the college's response.

Confidential Resources (Off-Campus Support)

If a claimant or reporter wishes to maintain complete confidentiality without triggering an institutional investigation or mandatory report, they should utilize off-campus community resources:

- **Phoenix House Violence & Sexual Assault Crisis Line:** 712-328-0266 or 1-888-612-0266
- **Iowa Coalition Against Sexual Assault (Iowa CASA):** iowacasa.org/resources
- **RAINN National Sexual Assault Hotline:** 800-656-HOPE (4673) <https://rainn.org/>

3. VAWA & PRIMARY PREVENTION PROGRAMS

Awareness & Educational Programs

SOHO Hair Academy provides primary prevention and awareness programming to all incoming students and new employees during orientation and onboarding.

Programming addresses sexual assault, domestic violence, dating violence, and stalking, and includes:

- **Primary Prevention Strategies:** Information on recognizing abusive behaviors, understanding consent, and understanding institutional and legal definitions.
- **Bystander Intervention:** Instruction on safe and positive options for bystander intervention, empowering individuals to recognize warning signs and safely step in to prevent or interrupt potentially harmful or unsafe situations.
- **Risk Reduction:** Practical strategies and options for risk reduction, personal safety, and risk awareness to promote campus safety.
- **Educational Materials:** Institutional and national brochures detailing sexual assault prevention, risk reduction strategies, and victim rights are available at all times in the main administrative office.
- **Annual Staff & Coordinator Training:** The Title IX Coordinator receives annual specialized VAWA and Title IX compliance training. All Responsible Employees receive mandatory annual training on identifying, preventing, responding to, and reporting sexual misconduct.

4. SURVIVOR ACCOMMODATIONS & INTERIM MEASURES

Supportive Measures & Accommodations

Upon receiving a report of sexual assault, domestic violence, dating violence, or stalking, SOHO Hair Academy will immediately provide the Complainant (and Respondent, as applicable) with a written explanation of their rights and options, regardless of whether a formal law enforcement report is filed:

This written document details:

- Available interim supportive measures and accommodations (academic schedule adjustments, transportation assistance, mutual no-contact orders).
- The limits of confidentiality and reporting obligations of Responsible Employees.
- Procedures for filing a formal institutional complaint or reporting to local law enforcement.
- Rights regarding orders of protection, no-contact orders, or restraining orders issued by civil, criminal, or tribal courts.
- Available internal and off-campus medical, mental health, victim advocacy, legal assistance, and financial aid resources.
- Law Enforcement Assistance: Guidance and assistance in notifying local law enforcement agencies upon request. Institutional Disciplinary Procedures & Sanctions

SOHO Hair Academy handles all reports of sexual misconduct, sexual assault, domestic violence, dating violence, and stalking through a prompt, fair, and impartial grievance process from the initial investigation to the final outcome.

1. Training & Qualification of Officials

All proceedings, including investigations, hearings, and administrative reviews, are conducted by institutional officials (including the Title IX Coordinator and designated adjudicators) who receive required annual training. Training covers:

- Identifying and preventing sexual misconduct, sexual assault, domestic violence, dating violence, and stalking.
- Conducting fair and impartial investigations and hearings that protect safety and promote accountability.
- Protecting confidentiality and applying relevant evidentiary standards.

2. Equal Procedural Rights & Advisor Choice

Throughout the grievance and disciplinary process, both the Complainant and the Respondent are provided equal procedural protections, including:

- Equal opportunities to present evidence, identify witnesses, and fully participate in all phases of the proceeding.
- The right to be accompanied to any meeting, interview, or hearing by an advisor of their choice (who may be an attorney, advocate, friend, or family member).
- Equal and timely access to any information or evidence that will be used during meetings and disciplinary hearings.

3. Step-by-Step Grievance Process

1. Report & Supportive Measures: Upon receiving a report, the Title IX Coordinator meets with the Complainant to explain reporting options, rights, and available interim supportive measures (e.g., schedule changes, no-contact orders).
2. Investigation: A trained, impartial investigator conducts interviews with the Complainant, Respondent, and relevant witnesses, gathering documentary and physical evidence.
3. Draft Report Review: Both parties and their advisors receive a draft of the investigative report and have 10 days to review, inspect evidence, and submit written responses.
4. Adjudication / Decision: A trained decision-maker evaluates all gathered evidence using the Preponderance of the Evidence standard (*i.e., whether it is more likely than not that the violation occurred*) to determine responsibility.
5. Simultaneous Written Notice: Both the Complainant and Respondent receive simultaneous written notification of:
 - The determination regarding responsibility and rationale.
 - Any disciplinary sanctions imposed on the Respondent.
 - Any remedies designed to restore or preserve equal access provided to the Complainant.
 - Appeals procedures, permissible grounds, and the name of the designated Appeal Officer
 - A designated appeal officer and independent decision-maker.
 - The date and time when the results become final.
6. Appeals: Either party may appeal the outcome within 5 business days of receiving the decision. Permissible grounds for appeal are strictly limited to:
 - Procedural irregularity that affected the outcome;
 - New evidence not reasonably available at the time of determination that could affect the outcome; or
 - A conflict of interest or bias by the Title IX Coordinator, investigator, or decision-maker.

Appeals will be reviewed by an independent Appeal Officer who did not serve as the investigator or initial decision-maker

4. Range of Potential Sanctions

If a student or employee is found responsible for violating the Sexual Misconduct Policy, SOHO Hair Academy may impose sanctions proportionate to the severity of the offense.

Student Sanctions

- Written Warning / Reprimand: Official written notice specifying that further violations will result in more severe disciplinary action.
- Disciplinary Probation: A specified period of observation and review during which a student must meet specific behavioral conditions.
- Educational / Remedial Sanctions: Mandatory completion of reflection essays, community service, or specialized training/counseling programs.
- Restriction of Privileges: Temporary or permanent loss of specific campus privileges, including

- participation in clinic floor activities, academy events, or student leadership roles.
- **Suspension:** Temporary separation and exclusion from SOHO Hair Academy premises, classes, and activities for a specified duration.
- **Expulsion / Dismissal:** Permanent separation from SOHO Hair Academy with immediate revocation of enrollment status.

Employee Sanctions (Faculty & Staff)

- **Verbal or Written Reprimand:** Formal warning placed in the employee's personnel file.
- **Mandatory Training / Performance Improvement Plan:** Requirement to complete specific sensitivity or compliance training.
- **Reassignment or Suspension of Supervisory Duties:** Modification of daily responsibilities or loss of oversight over students/staff.
- **Unpaid Suspension:** Temporary removal from workplace duties without pay for a defined period.
- **Termination of Employment:** Permanent termination of employment status with SOHO Hair Academy.

Prohibition of Retaliation

SOHO Hair Academy strictly prohibits retaliation against any individual—including claimants, respondents, witnesses, or reporters—for reporting alleged sexual misconduct, participating in or refusing to participate in any investigation or proceeding, or opposing discriminatory practices. Retaliation includes intimidation, threats, coercion, or discrimination by any student or employee. Any suspected retaliation should be reported immediately to the Title IX Coordinator and will be grounds for separate disciplinary action.

5. CLERY ACT & CRIME REPORTING PROCEDURES

How to Report Crimes

Students, staff, and visitors must report criminal acts or emergencies immediately:

1. **In Person:** Report directly to the President's Office or Campus Security Authority (CSA) Office.
2. **By Phone:** Call Courtney Holiday (CSA / Title IX Coordinator) or Somer Krueger (President) at 712-328-2613, or dial 911 for immediate emergencies.
3. **Incident Documentation:** The SOHO Hair Academy Incident Report Form will be completed with administrative assistance upon receiving a report.

Annual Security Report (ASR) Publication & Distribution

- **Distribution Schedule:** The ASR is published and distributed annually by October 1 to current students and employees. Prospective students and employees receive a copy or notification upon enrollment or application.
- **Data Collection:** Crime statistics are gathered by the CSA in cooperation with local law enforcement. Statistics are categorized by the date reported (not conviction status) across required geographical areas.

Clery Act Reportable Crime Categories

The Academy tracks and reports statistics for the following offenses within its Clery geography:

- **Primary Offenses:** Murder, Non-Negligent Manslaughter, Manslaughter by Negligence, Sex Offenses (Forcible and Non-Forcible), Robbery, Aggravated Assault, Burglary, Motor Vehicle Theft, Arson, Hazing.
- **VAWA Offenses:** Domestic Violence, Dating Violence, Stalking.
- **Arrests & Disciplinary Referrals:** Liquor Law Violations, Drug Abuse Violations, Weapons Law Violations.
- **Hate Crimes:** Any of the above offenses, or cases of Larceny-Theft, Simple Assault, Intimidation, or Vandalism, that manifest evidence of prejudice based on Race, Gender, Religion, Sexual Orientation, Ethnicity, Disability, Gender Identity, or National Origin.

Definitions of Consent & Key Offenses

- **Affirmative Consent:** A clear, voluntary, and unambiguous agreement to engage in sexual activity. Consent cannot be given by someone who is incapacitated by drugs, alcohol, sleep, unconsciousness, or intellectual disability. Silence, lack of resistance, or past consent does not imply future consent. Consent can be withdrawn at any time.
- **Prohibited Conduct:** Includes sexual harassment, sexual assault (non-consensual sexual intercourse or

contact), domestic violence, dating violence, stalking, sexual exploitation, retaliation, and intimidation.

VAWA Offenses (FBI/Statutory Definitions)

- **Sexual Assault:** Non-consensual sexual intercourse, non-consensual sexual contact, incest, or statutory rape (using the FBI's National Incident-Based Reporting System / NIBRS definitions).
- **Domestic Violence:** Felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner, cohabitant, person with a child in common, or similarly situated individual under Iowa domestic violence laws.
- **Dating Violence:** Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim, determined by length, type, and frequency of interaction.
- **Stalking:** Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for their safety or the safety of others, or suffer substantial emotional distress.

Hate Crime Offenses

While primary crimes are covered above, the four additional crimes that apply only when motivated by hate bias must be defined:

- **Larceny-Theft:** Unlawful taking, carrying, leading, or riding away of property from the possession of another.
- **Simple Assault:** An unlawful physical attack by one person upon another where neither offender displays a weapon, nor victim suffers obvious severe injury.
- **Intimidation:** Unlawfully placing another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct.
- **Destruction/Damage/Vandalism of Property:** Willfully or maliciously destroying, damaging, defacing, or otherwise injuring real or personal property.

Hazing (New 2026 Clery Disclosure)

- **Hazing:** Any intentional, knowing, or reckless act committed by a person against a student (regardless of willingness) in connection with initiation into, affiliation with, or maintenance of membership in a student organization that creates a risk of physical or psychological injury above reasonable risks.

Clery Geography Definitions

- **On-Campus Property:** Buildings or property owned or controlled by the institution within the same reasonably contiguous geographic area, used for educational purposes (e.g., 2600 South 9th Street, Council Bluffs, IA).
- **Public Property:** All public property (e.g., sidewalks, streets, public parking lots) directly adjacent to and accessible from the campus.
- **Non-Campus Property:** Property owned/controlled by a recognized student organization or used for educational purposes that is not contiguous to the main campus. (*SOHO Hair Academy currently maintains no non-campus property*).

6. CAMPUS SAFETY PROTOCOLS & NOTIFICATIONS

Timely Warnings & Emergency Notifications

- **Timely Warnings:** Issued for any Clery-reportable crime occurring within Clery geography that is considered a continuing or serious threat to students and employees. Distributed via campus PA systems, classroom announcements, bulletin boards, and official social media channels.
- **Emergency Notifications:** Issued immediately upon confirmation of a significant emergency or dangerous situation involving an immediate threat to health or safety on campus (e.g., active shooter, severe weather event). The President or CSA will issue the notification without delay, unless doing so would compromise containment or response efforts.
- **Annual Testing:** Emergency response and evacuation procedures are tested and documented on an annual basis.

Crime Log & Campus Law Enforcement

- **Campus Law Enforcement:** SOHO Hair Academy is a non-residential institution and does not operate an independent campus police force. All criminal matters are handled in coordination with local law enforcement agencies.
- **Crime Log:** Maintained by the CSA, the crime log records the nature, date, time, general location, and disposition of each reported crime. New entries and updates are entered and made available for public inspection within two business days of receiving the report, except where disclosure is legally restricted or would jeopardize an ongoing investigation or party confidentiality.

Registered Sex Offender Information

In accordance with the Campus Sex Crimes Prevention Act, members of the campus community may access registered sex offender information via state and federal registries:

- **Iowa Sex Offender Registry:** Information concerning registered sex offenders and predators may be obtained from:

Iowa Sex Offender Registry
Division of Criminal Investigation
Dept. of Public Safety Building
215 East 7th St
Des Moines, Iowa 50319
515-725-6059
www.iowasexoffender.com

- **National Sex Offender Public Website (NSOPW):**
nsopw.gov