Campus Health & Safety Annual Security Report
October 2026

Studio Incamminati
School for Contemporary Realist Art

ANNUAL SECURITY REPORT CONTENTS

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I. HEALTH AND SAFETY

1. Materials

Art materials recommended and approved for use at Studio Incamminati are described on class supply lists.

Use of the following items is prohibited in Studio Incamminati and anywhere indoors within the Bok Building: turpentine, varnishes containing turpentine, and charcoal powder.

2. Materials Handling

The HVAC units with filtration should be running during regular class hours.

Solvents must be kept in containers with airtight lids. After class is over for the day, all solvents used must be labeled, sealed and stored in the flammable cabinet in the central hallway. Solvents are not to be kept in student lockers. Solvents found open and unattended after class hours will be disposed of by staff. Fixatives are to be used only outside on the east patio. In case of an emergency: Eye wash stations (5) are located throughout the studios and kitchen area.

Relevant Material Data and Safety are posted on the bulletin board across the hall from the office.

Students must clean up spills of solvents, paints and oils immediately and place cleanup materials in red oily waste can. There are two studio double sinks to wash brushes and clean up after painting. The kitchen sink is reserved for food preparation and cleanup of eating utensils only.

Students who are pregnant or think they may be pregnant, must consult a doctor who is familiar with the toxicology of art materials, and in particular the materials in use, to receive a definitive assessment of their circumstances and recommendations about how to proceed from a medical point of view.

3. Waste Disposal and Recycling

Red oil cans are designated for disposal of only oily materials such as solvent, paint, and oil soaked towels. Other trash such as paper cups and napkins are disposed of in the regular trash cans. Please attach a plastic bag or other waste container to your taboret for collection of oily waste, then dispose of in red oil cans at the end of the day.

Studio Incamminati recycles glass bottles, jars, plastic containers/bottles and empty paint or aerosol cans only. Materials for recycling are to be disposed of in the blue recycle containers located throughout the studio.

Use solvent to clean brushes of excess paint before washing them with soap and water in the sink. Solvent can be reused after allowing paint residue to settle

to the bottom of your container. Every student should have 2 jars, one for storage of dirty solvent and another for daily use wherein the student can pour the clean solvent after it has settled.
Do not allow sludge to go into the sink. Toxic material found in excess in the pipes are subject to a heavy fine.

4. Lighting

Halogen lights used for lighting the model and still life setups get extremely hot. Please use caution when handling, for both yourself and the individuals around you. Halogen lights must not touch flammable materials, and may not be left unattended. Only Studio Incamminati monitors, instructors and staff may handle lighting on the models. Safety lines on lighting should always be in use. Extension cords used in the studios for model lights, heaters or fans must be used with floor cord covers or be taped to the floor.

Lighting and other studio equipment is prohibited from being hung on any fire suppression system pipes.

5. Emergency Evacuation

The following is the Bok Building Fire Evacuation Procedure:

If you discover fire or smoke, sound the building fire alarm. Know the location of the alarm signal stations and how they operate.

The central station will notify the Fire Department when an alarm is transmitted by dialing 9-1-1.

When the fire alarm sounds, leave the building at once. Proceed into the fire exit and leave the building by the stairs. Do not use the elevators.

Feel doors before opening them. If it is hot or smoke is seeping in, do not open. If you become trapped in your office/studio and cannot reach the fire exit, keep the door closed and seal off any cracks. Use the telephone to call 9-1-1 and
give the name and location of the building, the floor you are on and the room number. If the door feels cool, open it cautiously. Be braced to slam it shut if the corridor is full of smoke or if you feel heat pressure.

If caught in smoke or heat, stay low where the air is better. Take short breaths through nose until you reach the fire exit.

Be sure to keep the fire exit doors closed at all times during daily operations so that smoke does not enter the stairway.

Fire exit drills are held during the school year. These drills will be scheduled and all occupants will be notified in advance.

6. **Policy on Sex Discrimination, Sexual Harassment and Sexual Violence** *This policy was modified March 2016 to ensure that Studio Incamminati procedures are in compliance with the guidance issued by the Office for Civil Rights on April 4, 2011 relating to post-secondary institutions' obligations under Title IX to respond appropriately to allegations of sexual harassment and sexual violence. Sexual harassment and sexual violence are forms of sex discrimination prohibited by Title IX. In addition to sexual violence, this policy addresses any discrimination or harassment based on gender, sexual orientation, gender identity, or gender expression. This policy was subsequently modified to ensure that Studio Incamminati is in compliance with the Violence Against Women Act amendments, Campus SaVE Act, the April 2014 Questions and Answers on Title IX and Sexual Violence from the Office for Civil Rights, and guidance issued under The White House Document, Not Alone.*

   While this policy speaks specifically to harassment based on sexual discrimination, all incidents involving harassment under protected classifications as outlined in the Studio Incamminati's NonDiscrimination Policy, will follow the same procedures for investigation, hearing and appeal.

A. Policy Statement

It is the policy of Studio Incamminati that while employed or enrolled at the School, no administrator, faculty member, staff member or student shall be subject to discrimination based upon sex, which can include acts of sexual violence, sexual harassment, domestic violence, dating violence and stalking, by another member of the School community. Studio Incamminati's community includes staff, faculty, guest instructors, volunteers, students, board members, models, and independent contractors. Studio Incamminati expects all members to conduct themselves in a manner that does not infringe upon the rights of others; the School believes in a zero tolerance policy for gender-based or sexual misconduct.

Included within this Policy is Studio Incamminati's commitment to protect the individuals who are involved in an investigation of a potential violation of this Policy against retaliation from any member of the School community. Such retaliation will be deemed a separate basis for violating the School's Policy on Sex Discrimination, Sexual Harassment and Sexual Violence. For the purposes of this policy, sex discrimination, sexual harassment and sexual violence all fall under the category of sexual misconduct.

B. Policy Rationale

Studio Incamminati values appropriate relationships, respect for all and shared responsibility. Therefore, the School is committed to fostering an educational and working environment that is free from sexual harassment and sexual violence. In recognition of and respect for the dignity of all at School, sexual misconduct in any form, cannot, and will not, be tolerated. This policy directly supports our mission to provide a positive work and learning environment and communal respect. The last decade has witnessed a heightened awareness in our society of the various forms of sexual misconduct, and a deep and sincere concern for the Studio Incamminati community prompts us to form a Policy on Sex Discrimination, Sexual Harassment and Sexual Violence.

The purpose of this policy is:

- To educate the School's community on the definitions of sexual discrimination,
- To outline the steps necessary to deal most effectively with cases involving allegations of sexual misconduct, and
- To define the rights and responsibilities for members of the Studio Incamminati community.

C. Scope of Policy

- This policy and the procedures set forth herein apply to and cover all members of the Studio Incamminati community which includes all administrators, faculty, staff, and students. Title IX protects students from sexual harassment in a school's educational programs and activities both on campus and off.
- The School also contracts a number of vendors. These individuals are also protected from all forms of discrimination and are held accountable to policies and procedures outlined by their respective employers. If a vendor is accused of misconduct against a member of Studio Incamminati, the School will work collaboratively with the individual's employer. At the request of the School, these individuals

may also be subject to interim measures (outlined below) while an incident is investigated and resolved.

- Employees are protected from sexual discrimination in all phases of their employment including applications, job performance, salary and promotions.
- Members of Studio Incamminati who are traveling on School business (meetings, conferences, In Your Town workshops) are expected to comply with this Policy regardless of local laws and/or customs.
- Title IX also prohibits harassment based upon sex or sex-stereotyping.
- Members of the School's community are protected from being retaliated against for filing a claim or for cooperating in an investigation.

D. Legal Definition

Discrimination or harassment on the bias of sex is a violation of Section 703 of
Title VII of the l964 Civil Rights Action and Title IX of the Educational Amendments of 1972. Unwelcome sexual advancements, requests for sexual favors, and other verbal, non-verbal or physical conduct of a sexual nature constitute sexual harassment when:

- Submission to such conduct is made either explicitly or implicitly a term or a condition of an individual's employment or academic advancement;
- Submission to or rejection of such conduct by an individual is used as a

  basis for employment or academic decisions affecting the individual; or such conduct has the purpose or effect of unreasonably interfering with an individual's academic or work performance or creating an intimidating, hostile, or offensive educational, living or working environment.

E. Title IX Coordinator

Studio Incamminati designates Tamara Stokes, Financial Administrator, as the Title IX Coordinator. The Title IX Coordinator oversees the School's centralized review, investigation, and resolution of reports of sexual misconduct. The coordinator also coordinates the School's compliance with Title IX. The Title IX coordinator is:

- responsible for oversight of the investigation and resolution of all reports of sexual misconduct;

- knowledgeable and trained in relevant state and federal laws and School policy and procedure;
- available to advise any individual, including a complainant, a respondent, or a third party, about the courses of action available at the School, both informally and formally;
- available to provide assistance to any School member regarding how to respond appropriately to reports of sexual misconduct;
- responsible for monitoring full compliance with all requirements and timelines specified in the complaint procedures; and
- responsible for compiling annual and semi-annual reports.

F. Bullying or Intimidation

Bullying includes any intentional electronic, written, verbal, or physical act or a series of acts directed at another individual or individuals that is severe, persistent, or pervasive and that has the intended effect of doing any of the following: (i) substantially interfering with a student's education; (ii) creating a threatening environment; or (iii) substantially disrupting the orderly operation of the School. Bullying is prohibited, and participating in such acts will result in disciplinary action. Bullying that is based on gender, sexual orientation, gender identity, or gender expression, or based on any other protected classification as outlined in the School's Non-Discrimination Policy will be handled under this policy.

Intimidation is any verbal, written, or electronic threats of violence or other threatening behavior directed toward another person or group that reasonably leads the person(s) in the group to fear for her/his physical well-being.
Intimidation is prohibited and will result in disciplinary action.

Anyone who attempts to use bullying or intimidation to retaliate against someone who reports an incident, brings a complaint, or participates in an investigation in an attempt to influence the judicial process will be in violation of retaliation as described within this policy and will be subject to disciplinary action.

SEXUAL MISCONDUCT OFFENSES INCLUDE, BUT ARE NOT LIMITED TO:

1. Sexual Harassment
2. Sexual Assault
   i. Non-Consensual Sexual Contact (or attempts to commit same)
   ii. Non-Consensual Sexual Intercourse (or attempts to commit same)

3. Sexual Exploitation
4. Stalking
5. Intimate Partner Violence: Domestic Violence or Dating Violence
6. Bullying or Intimidation

Detailed definitions and examples of these forms of misconduct are included at the end of this policy section.

G. Reporting Sexual Misconduct in Any Form

If a member has been subjected to an act of sexual misconduct, they are urged to report the incident immediately. Members may also want to discuss the event with a close friend, roommate, Resident Assistant, staff, faculty, family member, etc. who can support you through the initial medical treatment (if necessary) and reporting of the events. If a member has been the victim of sexual violence they are urged to report the incident to the police immediately.

If a member has been the victim of an act of sexual misconduct, they may be wondering what to do next. Here are some of your **options**:

- Get to a place where you feel physically and emotionally safe.
- Contact someone they trust to stay with for moral support.
  - ◆ Immediately report the incident to the appropriate School personnel or another person they trust.
- Immediately report the incident to the police by calling 911.
- If a member was a victim of sexual violence, it is important to seek medical care so they can be treated for injuries and tested for pregnancy and
  sexually transmitted diseases. Philadelphia has created the Philadelphia Sexual Assault Response Center (PSARC), located at 300 E. Hunting Park Avenue, Philadelphia, PA 19124 and can be reached via phone at 215-685-3251.
  - ◆ PSARC has specially trained and certified Sexual Assault Nurse Examiners (SANE) to assist in the medical process related to forensic exams. Forensic evidence can be collected up to 96 hours after an assault has occurred.
  - ◆ A forensic exam, completed by a medical practitioner, is the process through which physical evidence is collected. This evidence could be used in a judicial case, if the victim chooses to pursue charges. Physical evidence can include photo documentation of injuries, collection of fluids (blood, semen, urine, saliva) and other identifiable objects (hair, clothing with potential DNA). Forensic exams are free of charge to victims of

assault and will not be billed to the victim or the insurance company.

- Avoid showering, bathing, douching or cleaning in any other way to help preserve medical evidence if you choose to prosecute. Any clothes, sheets, or other items that may be considered evidence should be stored in paper (not plastic) bags. If you are still wearing the clothes you had on at the time of the assault be sure to bring a change of clothes with you to the hospital.

H. To File A Complaint with Studio Incamminati

To make a report of an act of sexual misconduct, we encourage a member to seek out another member of the School community with whom they feel comfortable (this may include a friend, teacher, advisor, etc.). If it occurs during regular office hours, the Administrative Office should be contacted immediately at 215-592-7910. If it occurs when the school is closed, it should be reported to the Administrative Offices as soon as possible after the school is open.

All reports of sexual discrimination, harassment and violence will be reported to Tamara Stokes, Title IX Coordinator. Individuals should be advised that the Title IX Coordinator is obligated to act on any report of alleged misconduct. The School does not limit the timeframe for filing a report of misconduct. Reports can be submitted at any time following an incident, although the School's ability to take any action may be negatively affected by the length of time between the alleged incident and the report.

Members may choose to pursue the incident through the School's hearing process; or to prosecute through the police; or both. Once the matter is reported, the School may have a responsibility to investigate the situation even if a member chose not to cooperate with the School. Members should not feel pressured into any option and may want to consult with their family before making a decision.

I. Types of On-Campus Reports/Confidentiality of Reports

The School encourages members who experience sexual misconduct to talk to someone about what happened so they can get the support they need, and to allow the school to respond appropriately. Different staff members have different abilities to maintain a victim's confidentiality.

- Some individuals are required to maintain complete confidentiality; talking to them is sometimes called a "privileged communication." These individuals have a legal and professional obligation not to reveal information shared with them in the scope of performing their duties.
- All other School employees are designated as responsible employees and are required to report all the details of an incident (including the identities of both the victim and alleged perpetrator) to the Title IX coordinator. A report to these employees constitutes a report to the School and generally obligates

the School to investigate the incident and take appropriate steps to address the situation.

A. Privileged and Confidential Communications

Professional, licensed counselors who provide mental-health counseling to members of the School are not required to report any information about an incident to the Title IX coordinator without a victim's permission. Studio Incamminati can refer members to a professional counselor when requested. However, members may also choose another counselor on their own.

B. Reporting to Responsible Employees

Studio Incamminati staff are considered responsible employees. A responsible employee is an employee who has the authority to redress sexual violence, who has the duty to report incidents of sexual violence or other misconduct, or who is an individual who is reasonably believed to have this authority.

When a victim tells a responsible employee about an incident of sexual violence, the victim has the right to expect the School to take immediate and appropriate steps to investigate what happened and to resolve the matter promptly and equitably. A responsible employee must report to the Title IX coordinator all relevant details about the alleged incident shared by the victim so that the School can determine what happened – including the names of the victim and alleged perpetrator(s), any witnesses, and any other relevant facts, including the date, time and specific location of the alleged incident.

To the extent possible, information reported to a responsible employee will be shared only with people responsible for handling the School's response to the report. A responsible employee should not share information with law enforcement without the victim's consent or unless the victim has also reported the incident to law enforcement. Before a victim reveals any information to a responsible employee, the employee should ensure that the victim understands the employee's reporting obligations – and, if the victim wants to maintain confidentiality, direct the victim to confidential resources.

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

Responsible employees will not pressure a victim to request confidentiality, but will honor and support the victim's wishes, including that the School investigate an incident fully. By the same token, responsible employees will 9 not pressure a victim to make a full report if thevictim is not ready to do so.

Requesting Confidentiality From Studio Incamminati: How the School Will Weigh the Request and Respond.

If a victim discloses an incident to a responsible employee but wishes to maintain confidentiality or requests that no investigation into a particular incident be conducted or disciplinary action taken, the School must weigh that request against the School's obligation to provide a safe, non-discriminatory environment for all individuals, including the victim.

If the School honors the request for confidentiality, a victim must understand that the School's ability to meaningfully investigate the incident and pursue disciplinary action against the alleged perpetrator(s) may be limited.

Although rare, there are times when the School may not be able to honor a victim's request in order to provide a safe, non-discriminatory environment.

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

- The increased risk that the alleged perpetrator will commit additional acts of sexual or other violence, such as:
    - ◆ whether there have been other sexual violence complaints about the same alleged perpetrator;
    - ◆ whether the alleged perpetrator has a history of arrests or records from a prior school indicating a history of violence;
    - ◆ whether the alleged perpetrator threatened further sexual violence or other violence against the victim or others;
    - ◆ whether the sexual violence was committed by multiple perpetrators;
    - ◆ whether the sexual violence was perpetrated with a weapon;
    - ◆ whether the victim is a minor;
    - ◆ whether the School possesses other means to obtain relevant evidence of the sexual violence (e.g., security cameras or personnel, physical evidence);
    - ◆ whether the victim'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 School to investigate the alleged incident. If the School determines that it cannot maintain a victim's confidentiality, the School will inform the victim prior to starting an investigation and will, to the extent possible, only share information with people responsible for handling the School's response.

The School will remain ever mindful of the victim's well-being, and will take ongoing steps to protect the victim from retaliation or harm and work with the victim to create a safety plan. Retaliation against the victim, whether by students or School employees, will not be tolerated.The School will also:

- assist the victim in accessing other available victim advocacy, academic support, counseling, disability, health or mental health services, and legal assistance both on and off campus (see portion of policy identifying these);
- provide other security and support, which could include issuing a no- contact order, helping arrange a change of living or working arrangements or course schedules (including for the alleged perpetrator pending the outcome of an investigation) or adjustments for assignments or tests; and
- inform the victim of the right to report a crime to campus or local law enforcement—and provide the victim with assistance if the victim wishes to do so.

Because the School is under a continuing obligation to address the issue of sexual violence campus-wide, reports of sexual violence (including non-identifying reports) will also prompt the School to consider broader remedial action – such as increased monitoring, supervision or security at locations where the reported sexual violence 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 School determines that it can respect a victim's request for confidentiality, the School will also take immediate action as necessary to protect and assist the victim.

J. Investigation, Hearing and Resolution

In order to assure a prompt and equitable resolution to the complaint, complainants will be asked to provide an initial statement reporting the specifics of the incident, names of individuals, date, time, place, specifics which occurred, witnesses to the events described, etc. This statement will start the School's investigation of the events reported.

- An investigation will be conducted once a statement is filed. Statements may be filed by the complainant, by a parent or by a third party.
- If requested, every effort will be made to investigate the incident confidentially. The School cannot promise complete confidentiality.
  Information can only be shared within the School if there is a "legitimate educational need." In order for information to be shared outside of the School, a complainant would need to give explicit permission or that information would need to be subpoenaed. It should be noted that the School's ability to thoroughly investigate and resolve incidents of sexual misconduct may by limited should the complainant not want his or her name or any identifiable information shared.
- The person who makes the report is the complainant and the individual named in the report is the respondent.

- The respondent will be asked to provide his/her version of the events. The complainant's statement will be shared with the respondent.
- The respondent's statement will be shared with the complainant.
- In the event there is little or no dispute between the versions of the events and the respondent admits the conduct, the matter may be resolved without a hearing at the discretion of the Title IX Coordinator or designated investigator. The appropriate discipline may be imposed by the School based upon the facts admitted during the investigation. If the complainant concurs with the School's resolution, the matter is concluded without the need for a hearing.
- Even when there is significant difference in the facts relayed by the complainant and respondent, the School may impose interim measures on the respondent.
- If the facts are in dispute and the Title IX Coordinator concludes there is a basis to move forward, a private disciplinary hearing will be held where the complainant and respondent will each be treated without prejudice or bias and where each will only be asked to answer questions relevant to the specific misconduct under consideration.
- A specially trained hearing panel will be convened to adjudicate allegations of sexual misconduct. New members of this hearing panel receive training on Title IX, current guidance from the Office for Civil Rights at the Department of Education and the School's judicial process. Refresher trainings are held for the full panel annually.
    - ***The hearing panel will contain between 3-5 members for each hearing. These members are drawn from a pool of between 5-10 trained members.*** Panel members may recuse themselves from any hearing due to conflict of interest or other inability to fully participate in a complete hearing.
    - The Title IX Coordinator will serve also as Secretary is to ensure that all policies and procedures, as outlined in the Policies & Guidelines are followed.
- The School will use its best efforts to complete its investigation within 14 business days of the date it receives the Statements and to schedule a disciplinary hearing within another 7 business days.
- The parties may mutually agree to extend these time periods.
- This hearing will not be, and may not be, taped. Out of respect for privacy, the School requests that all students keep information from a hearing confidential and that employees exercise discretion regarding the information disclosed in the hearings.
- Both parties need to submit any additional documentation to the hearing officer at least 48 hours prior to the hearing and will be shared with the respective parties. Both parties will be shown a copy of the statements provided by the other party; this includes statements from any witnesses of fact.

- At least 72 hours' notice will be given to appear at the hearing and a written decision, complete with sanctions, if any, will be received within 10 business days after the hearing.
- If desired, the complainant will be permitted to attend the entire hearing. If the complaint chooses not to attend the hearing, he or she will be offered the opportunity to submit a written statement of fact to be read at the hearing. If the respondent fails to appear he or she may submit a written statement of fact to be read at the hearing. If either party declines to participate, the hearing will move forward and no adverse inference will be drawn.
- Both parties are permitted to bring an advisor or advocate with them to the hearing. This advisor may be a member of the School's community. This person will not be permitted to speak during the hearing but can stay for the duration to provide support.
- Once the original statement has been filed, the School will use its best efforts to process the incident (this includes investigation of facts, hearing notification, the hearing, deliberation, notification of the outcome of the hearing and the appeal process) within 60 business days. Circumstances may arise that require the extension of time frames, including extension beyond sixty (60) days. Such circumstances may include the complexity of the allegations, the number of witnesses involved, the availability of the parties or witnesses, the effect of a concurrent criminal investigation, any intervening school break or vacation, or other unforeseen circumstances. In the event that the investigation and resolution exceed this time frame, the School will notify all parties of the reason for the delay and the expected adjustment in time frames. Best efforts will be made to complete the process in a timely manner by balancing principles of thoroughness and fundamental fairness with promptness.
- Character witnesses are not permitted at the hearing. In determining a remedy, the School may take into consideration the prior disciplinary history of the respondent.
- The School utilizes preponderance of evidence as the standard of proof in disciplinary proceedings; this standard is met if the proposition is more likely to be true than not true. Preponderance of evidence is the acceptable standard for civil cases.
- The complainant and respondent will be notified of the outcome of the hearing; this notification will be made in writing and will occur as concurrently as possible.
- The process will terminate if the respondent is no longer a student or employee.
- The School will cooperate to the extent permitted by law with criminal proceedings. The School does not condone retaliation towards the respondent or the complainant.

- Any claims of retaliation will be investigated and those individuals will be subject to disciplinary action. Please see the end of this policy additional information on retaliation.

- Mediation will not be used to resolve sexual violence complaints.

K. Appeals

- Both parties have the right to appeal. A letter of appeal should be addressed to the Executive Director within 3 business days of receipt of the decision. This letter should include fact-based reasoning for appeal, such as failure to abide by existing procedures, failure to consider relevant information, etc. The parties will receive written notice of an appeal decision within 10 business days. Additional details about the Appeal Process are described below.
- Appeals will go to a specially trained appeals board. ***The School's Appeals Board may consist of faculty, administrators or board members as appointed by the Executive Director.*** The non-appealing party will be notified that the appeal has been filed. Once it is formed, the Appeals Board will notify the parties if additional documentation is requested and the time
period for its submission. All documentation reviewed by the Board will be made available in advance for both parties to review and submit comments; comments will be shared with one another. If evidence is discovered after the conclusion of the hearing, this new evidence will be reviewed by the Appeals Board. Both parties will be made aware of any new evidence.
- The Appeals Board will, after reviewing all available evidence and documentation, make a recommendation to the Executive Director. In cases involving a recommendation of suspension or expulsion, the recommendation of the Appeals Board will be issued to the Executive Director. In cases not involving suspension or expulsion, there is no right for either party to appeal to the Executive Director. Both parties will receive written notice of the appeal decisions within 10 business days after the Appeals Board has received any additional documentation it may request. As stated earlier, the review of the Appeals Board is limited to fact-based issues and includes evidence of improper or inadequate procedure, prejudicial conduct and/or disproportionate penalty.
- Sanctions, such as interim suspension from the School may be imposed during the appeals process by the Executive Director.

Complaints Involving Faculty or Staff

Upon receipt of a statement involving faculty members or employees of the School, the Title IX Coordinator will assign an investigator to conduct the investigation. Impartial hearing officer(s) will be appointed

by the ***Board Chairman*** to conduct the hearing. An employee may only be suspended or terminated by the Executive Director. If the hearing officer recommends suspension or termination, the matter will go to the Executive Director.

L. Sanctions

Individuals found responsible for violating this policy may face one or more of the following sanctions. The severity of the incident, past judicial record, attitude and willingness to make amends will be taken into consideration when determining sanctioning.

Students

- Disciplinary Warning: notice to the student, orally or in writing, that continuation or repetition of the conduct found wrongful, within a period of time stated in the warning, may be cause for more severe disciplinary action.
- Disciplinary Probation: an official written notice to a student that violation of School's policies, regulations, or patterns contrary to School standards or expectations, will not be tolerated. Repeated offenses or violations of any conditions of probation will result in more severe action, including possible suspension or expulsion. Disciplinary probation lasts for a stated time.
- Educational Sanctions: include but are not limited to counseling, classes and/or community engagement/service.
- Loss of key access to the school.
- Suspension from the School for a specific period of time.
- Expulsion: termination (after due process) of student status for an indefinite period. The conditions of readmission, if permitted, shall be stated in the order of expulsion.

Faculty and Staff

Faculty and staff must follow all rules listed in the Policies & Guidelines manual. Concerns brought to the attention of the administration will ordinarily be addressed by a series of gradual steps involving strategies to resolve issues that have been identified. For example, the steps may include personal conferences, verbal and written warnings, and opportunities for assistance where applicable. When these steps are not warranted because of the seriousness of a violation, or when they do not result in a satisfactory resolution, individuals may be subject to suspension, probation, and/or dismissal.

M. Retaliation

Studio Incamminati strictly prohibits retaliation against any individual for reporting, providing information, exercising one's rights or responsibilities, or otherwise being involved in the process of responding to, investigating, or addressing allegations of sex discrimination, sexual harassment, and sexual violence. Therefore, any retaliation, intimidation, threats, coercion, or discrimination against any such individual, undertaken or attempted either directly or by someone acting on behalf of another, will be addressed in the most serious way by the School, and individuals who engage in such actions are subject to discipline up to and including suspension, expulsion, or dismissal. These behaviors will result in subsequent disciplinary proceedings. Anyone who is aware of possible retaliation or has other concerns regarding the response to a complaint of sexual misconduct should report such concerns to the Title IX Coordinator, who shall take appropriate actions to address such conduct in a prompt and equitable manner.

N. Title IX Coordinator

Studio Incamminati designates Tamara Stokes, Financial Administrator, as its Title IX coordinator. Her contact information is tstokes@studioincamminati.edu or 215-592-7910 ex. 2. Any questions or complaints regarding the School's policy or its implementation should be promptly brought to the attention of the Title IX coordinator. The Title IX Coordinator will maintain a confidential list of the complaints made under this policy, the disposition of these complaints and the timeline for resolution.

O. To File a Complaint with the Office of Civil Rights

Anyone who wishes to file a complaint with the Office of Civil Rights (OCR) may do so through the mail, email or online. Prior to filing a complaint with OCR against an institution, a potential complainant should review the grievance process and use that process to have the complaint resolved. However, a complainant is not required by law to use the institutional grievance process before filing a complaint with OCR. If a complainant uses an institutional grievance process and also chooses to file the complaint with OCR, the complaint must be filed with OCR within 60 days after completion of the institutional grievance process. For more information on filing a complaint, please visit the OCR website at https://www2.ed.gov/about/offices/list/ocr/complaintintro.html

P. Record Keeping

After a matter is concluded, the individual who conducted the investigation shall prepare a written summary of the matter. The purpose of the summary is (1) to insure the School is aware of repeat incidents by the same individual and

(2) for record keeping purposes so the School can evaluate the effectiveness of its anti- harassment policy and procedures. This summary will be kept in a separate file which may be consulted for the two purposes stated.

Q. Supplemental Information

DEFINITIONS OF SEXUAL MISCONDUCT

1. Sexual Harassment

Sexual Harassment is:

- unwelcome, gender-based verbal or physical conduct that is,
- sufficiently severe, persistent or pervasive that it,
- unreasonably interferes with, denies or limits someone's ability to participate in or benefit from the university's educational program and/ or activities, and is
- based on power differentials (quid pro quo, i.e. where an employee or student is informed their job or academic progress is dependent on

  their providing sexual favors to someone with authority over them), the creation of a hostile environment, or retaliation.

Examples include: an attempt to coerce an unwilling person into a sexual relationship; to repeatedly subject a person to egregious, unwelcome sexual attention; to punish a refusal to comply with a sexual based request; to condition a benefit on submitting to sexual advances; sexual violence; intimate partner violence, stalking; gender-based bullying.

Sexual harassment also includes harassment based on gender, sexual orientation, gender identity, or gender expression, which may include acts of verbal, nonverbal, or physical aggression, intimidation, or hostility based on sex/gender or sex/gender-stereotyping, even if the acts do not involve conduct of a sexual nature.

A single, isolated incident of sexual harassment alone may create a hostile environment if the incident is sufficiently severe. The more severe the conduct the
less need there is to show a repetitive series of incidents to create a hostile environment, particularly if the harassment is physical.

2. Sexual Assault

Sexual assault is defined as having sexual intercourse or sexual contact with another individual without consent, including:

- by the use or threat of force or coercion;

- without effective consent; or
- where that individual is incapacitated.

Sexual contact includes intentional contact with the intimate parts of another, causing another to touch one's intimate parts, or disrobing or exposure of another without permission. Intimate parts may include the breasts, genitals, buttocks, groin, mouth, or any other part of the body that is touched in a sexual manner. Sexual contact also includes attempted sexual intercourse.

Sexual intercourse includes vaginal or anal penetration, however slight, with a body part (e.g., penis, tongue, finger, hand, etc.) or object, or oral penetration involving mouth to genital contact.

It is important to note that a person who is incapacitated cannot consent to sexual activity. Consent to engage in sexual activity must be knowing and voluntary; it must exist from the beginning to end of each instance of sexual activity and for each form of sexual contact. Consent is demonstrated through mutually understandable words and/or actions that clearly indicate a willingness to engage freely in sexual activity. Consent is active, not passive. Incapacitation may result from the use of alcohol and/or drugs.
Incapacitation and consent are further defined at the end of this policy.

Sexual contact and sexual intercourse are defined in additional detail in items i. and ii. below:

i. NON-CONSENSUAL SEXUAL

CONTACT Non-Consensual Sexual Contact is:

- any intentional sexual touching,
- however slight,
- with any object,
- by a man or a woman upon a man or a woman, • that is without consent and/or by force.

Sexual Contact includes:

- Intentional contact with the breasts, buttock, groin, or genitals, or touching another with any of these body parts, or making another touch you

or themselves with or on any of these body parts; any intentional bodily contact in a sexual manner, though not involving contact with/of/ by breasts, buttocks, groin, genitals, mouth or other orifice.

ii. NON-CONSENSUAL SEXUAL INTERCOURSE

Non-Consensual Sexual Intercourse is:

- any intentional sexual touching,
- however slight,
- with any object,
- by a man or a woman upon a man or a woman, • that is without consent and/or by force. Intercourse includes:
- Vaginal penetration by a penis, object, tongue or finger, anal penetration by a penis, object, tongue, or finger, and oral copulation (mouth to genital contact or genital to mouth contact), no matter how slight the penetration or contact.

3. Sexual Exploitation

Occurs when an individual takes non-consensual or abusive sexual advantage of another for his/her own advantage or benefit, or to the benefit or advantage of anyone other than the one being exploited, and that behavior does not otherwise constitute one of other sexual misconduct offenses. Examples of sexual exploitation include, but are not limited to:

- Invasion of sexual privacy;
- Prostituting another individual;
- Non-consensual video or audio-taping of sexual activity;
- Going beyond the boundaries of consent (such as letting your friends hide in the closet to watch you having consensual sex);
- Engaging in voyeurism;
- Knowingly transmitting an STI/D or HIV to another individual;

  Exposing one's genitals in non-consensual circumstances; inducing another to expose their genitals;

- Sexually-based stalking and/or bullying may also be forms of sexual exploitation

4. Stalking

Stalking occurs when a person engages in a course of conduct or repeatedly commits acts toward another person, including following the person without proper authority, under circumstances that demonstrate either of the following:

- place the person in reasonable fear of bodily injury; or
- reasonably cause substantial emotional distress to the person.

Stalking includes the concept of cyber-stalking, a particular form of stalking in which electronic media such as the Internet, social networks, blogs, cell phones, texts, or other similar devices or forms of contact are used to pursue, harass, or to make unwelcome contact with another person in an unsolicited fashion.

Examples of stalking include:

- unwelcome and repeated visual or physical proximity to a person;
- repeated oral or written threats;
- extortion of money or valuables;
- unwelcome/unsolicited written communication, including letters, cards, emails, instant messages, and activity through social media or other online mediums;
- unwelcome/unsolicited communications about a person, their family, friends, or co-workers; or
- sending/posting unwelcome/ unsolicited messages with an assumed identity; or
- implicitly threatening physical contact;
- or any combination of these behaviors directed toward an individual person.

5. Intimate Partner Violence: Domestic Violence or Dating Violence

Intimate-partner violence, also referred to as dating violence, domestic violence, and relationship violence, includes any act of violence or threatened act of violence against a person who is, or has been involved in, a sexual, dating, domestic, or other intimate relationship with that person. It may involve one act or an ongoing pattern of behavior. Intimate- partner violence can encompass a broad range of behavior, including, but not limited to, physical violence, sexual violence, emotional violence, and economic abuse. Intimate-partner violence may take the form of threats, assault, property damage, or violence or threat of violence to one's self, one's sexual or romantic partner, or to the family members or friends of the sexual or romantic partner. Intimate-partner violence affects individuals of 19 all genders, gender identities, gender expressions, and sexual orientations and does not discriminate by racial, social, or economic background.

6. Bullying or Intimidation

Bullying includes any intentional electronic, written, verbal, or physical act or a series of acts directed at another individual or individuals that is severe, persistent, or pervasive and that has the intended effect of doing any of the following: (i) substantially interfering with a student's education; (ii) creating a threatening environment; or (iii) substantially disrupting the orderly operation of the School. Bullying is prohibited, and participating in such acts will result in disciplinary action. Bullying that is based on gender, sexual orientation, gender identity, or gender expression, or based on any other protected classification as outlined in the School's Non- Discrimination Policy will be handled under this policy.

Intimidation is any verbal, written, or electronic threats of violence or other threatening behavior directed toward another person or group that reasonably leads the person(s) in the group to fear for her/his physical well- being. Intimidation is prohibited and will result in disciplinary action.

Anyone who attempts to use bullying or intimidation to retaliate against someone who reports an incident, brings a complaint, or participates in an investigation in an attempt to influence the judicial process will be in
violation of retaliation as described within this policy and will be subject to disciplinary action.

ADDITIONAL APPLICABLE DEFINITIONS:

1. Consent:

Consent is clear, knowing and voluntary. Consent is active, not passive. Silence, in and of itself, cannot be interpreted as consent. The lack of a "no" cannot be interpreted as consent. Consent can be given by words or actions, as long as those words or actions create mutually understandable clear permission regarding willingness to engage in (and the conditions of) sexual activity.

- Consent to any one form of sexual activity cannot automatically imply consent to any other forms of sexual activity.
- Previous relationships or prior consent cannot imply consent to future sexual acts.
- The School affirms a "yes means yes" standard for consent; by this standard, consent is an affirmative, conscious and voluntary agreement to engage in sexual activity

2. Force:

Force is the use of physical violence and/or imposing on someone physically to gain sexual access. Force also includes threats, intimidation (implied threats) and coercion that overcome resistance or produce consent ("Have

sex with me or I'll hit you. Okay, don't hit me, I'll do what you want.").

- Coercion is unreasonable pressure for sexual activity. Coercive behavior differs from seductive behavior based on the type of pressure someone uses to get consent from another. When someone makes clear to you that they do not want sex, that they want to stop, or that they do not want to go past a certain point of sexual interaction, continued pressure beyond that point can be coercive.

- NOTE: There is no requirement that a party resists the sexual advance or request, but resistance is a clear demonstration of non-consent. The presence of force is not demonstrated by the absence of resistance. Sexual activity that is forced is by definition non-consensual, but non- consensual sexual activity is not by definition forced.
- In order to give effective consent, one must be of legal age.
- Sexual activity with someone who one should know to be—or based on the circumstances should reasonably have known to be—mentally or physically incapacitated (by alcohol or other drug use, unconsciousness or blackout), constitutes a violation of this policy.
    - ◆ Incapacitation is a state where someone cannot make rational, reasonable decisions because they lack the capacity to give knowing consent (e.g., to understand the "who, what, when, where, why or how" of their sexual interaction).
    - ◆ This policy also covers a person whose incapacity results from mental disability, sleep, involuntary physical restraint, or from the taking of rape drugs. Possession, use and/or distribution
      of any of these substances, including Rohypnol, Ketomine, GHB, Burundanga, etc. is prohibited, and administering one of these drugs to another individual is a violation of this policy. More information on these drugs can be found at http://www.911rape.org/
- Use of alcohol or other drugs will never function as a defense for any behavior that violates this policy.
- The sexual orientation and/or gender identity of individuals engaging in sexual activity is not relevant to allegations under this policy.
- For reference to the pertinent state statutes on sex offenses, please see
  www.legis.state.pa.us/WU01/LI/LI/CT/HTM/18/00.031..HTM

EXTERNAL RESOURCES:

Medical Care for Sexual Assault:

Philadelphia Sexual Assault Response Center (PSARC)
300 E. Hunting Park Avenue Philadelphia, PA 19124 (P) 215-685-3251

Hotline: 215-425-1625

24 Hour Hotlines:

Women Organized Against Rape (WOAR) 215.985-3333*
National Sexual Assault Hotline: 800-656-HOPE* Philadelphia
Domestic Violence Hotline: 866-SAFE-041

Sexual Harassment:

Women's Law Project 215.928.9801
Philadelphia Commission on Human Relations 215.686.4692

Prosecution:

Special Victims Unit 215.685.3251
Police Sex Crimes Unit 215.685.1180/81/82
Rape Prosecution Unit 215.686.8083

Please note that these resources are in Philadelphia. For locations outside of Philadelphia please call 911. *These resources are confidential

R. School Prevention Efforts

Prevention efforts focus not only on education, but also primary prevention techniques such as bystander intervention, as well as providing alternative programming for individuals. Alternative programming sometimes has an educational component, but sometimes it is purely designed to provide an alcohol and drug free environment for individuals, thus helping to minimize their own risk. Examples of programs are included in the chart below:

Type of Program	Examples
Lectures	Sexual Violence Prevention presented by WOAR
Awareness Programs	Orientation Day training and distribution of Drug and Alcohol Prevention Handbook and Sexual Violence Prevention policies
Training	Training for students, staff, faculty

S. Educational Resources

Our goal is to always prevent an incident from occurring. With this goal in mind, the remaining section includes examples of policy violations and risk reduction tips.

Examples

1. Amanda and Bill meet at a party. They spend the evening dancing and getting to know each other. Bill convinces Amanda to come up to his room. From 11:00 pm until 3:00 am, Bill uses every line he can think of to convince Amanda to have sex with him, but she adamantly refuses. He keeps at her, and begins to question her religious convictions, and accuses her of being "a prude." Finally, it seems to Bill that her resolve is weakening, and he convinces her to give him a "hand job" (hand to genital contact). Amanda would never had done it but for Bill's incessant advances. He feels that he successfully seduced her, and that she wanted to do it all along, but was playing shy and hard to get.

Why else would she have come up to his room alone after the party? If she really didn't want it, she could have left.

Bill is responsible for violating the Non-Consensual or Forced Sexual Contact section of this policy. It is likely that a School hearing would find that the degree and duration of the pressure Bill applied to Amanda are unreasonable. Bill coerced Amanda into performing unwanted sexual touching upon him. Where sexual activity is coerced, it is forced. Consent is not effective when forced. Sex without effective consent is sexual misconduct.

2. Jiang is a junior and Beth is a sophomore. Jiang comes to Beth's dorm room with some mutual friends to watch a movie. Jiang and Beth, who have never met before, are attracted to each other. After the movie, everyone leaves, and Jiang and Beth are alone. They hit it off, and are soon becoming more intimate. They start to make out. Jiang verbally expresses his desire to have sex with Beth. Beth, who was abused by a baby-sitter when she was five, and has not had any sexual relations since, is shocked at how quickly things are progressing. As Jiang takes her by the wrist over to the bed, lays her down, undresses her, and begins to have intercourse with her, Beth has a severe flashback to her childhood trauma. She wants to tell Jiang to stop, but cannot. Beth is stiff and unresponsive during the intercourse. Is this a policy violation?

Jiang would be held responsible in this scenario for Non Consensual Sexual Intercourse. It is the duty of the sexual initiator, Jiang, to make sure that he has mutually understandable consent to engage in sex. Though consent need not be verbal, it is the clearest form of consent. Here, Jiang had no verbal or non-verbal mutually understandable indication from Beth that she consented to sexual intercourse. Of course, wherever

possible, students should attempt to be as clear as possible as to whether or not sexual contact is desired, but students must be aware that for psychological reasons, or because of alcohol or drug use, one's partner may not be in a position to provide as clear an indication as the policy requires. As the policy makes clear, consent must be actively, not passively, given.

3. Kevin and Amy are at a party. Kevin is not sure how much Amy has been drinking, but he is pretty sure it's a lot. After the party, he walks Amy to her room, and Amy comes on to Kevin, initiating sexual activity. Kevin asks her if she is really up to this, and Amy says yes. Clothes go flying, and they end up in Amy's bed. Suddenly, Amy runs for the bathroom. When she returns, her face is pale, and Kevin thinks she may have thrown up. Amy gets back into bed, and they begin to have sexual intercourse. Kevin is having a good time, though he can't help but notice that Amy seems pretty groggy and passive, and he thinks Amy may have even passed out briefly during the sex, but he does not let that stop him. When Kevin runs into Amy the next day, he thanks her for the wild night. Amy remembers nothing, and decides to make a complaint to the Dean.

This is a violation of the Non-Consensual Sexual Intercourse Policy. Kevin should have known that Amy was incapable of making a rational, reasonable decision about sex. Even if Amy seemed to consent, Kevin was well aware that Amy had consumed a large amount of alcohol, and Kevin thought Amy was physically ill, and that she passed out during sex. Kevin should be held accountable for taking advantage of Amy in her condition. This is not the level of respectful conduct expected of students.

T. Risk Reduction Tips

Risk reduction tips can often take a victim-blaming tone, even unintentionally. With no intention to victim-blame, and with recognition that only those who commit sexual violence are responsible for those actions, these suggestions may nevertheless help you to reduce your risk experiencing a non-consensual sexual act. Below, suggestions to avoid committing a non-consensual sexual act are also offered:

- If you have limits, make them known as early as possible.
- Tell a sexual aggressor "NO" clearly and firmly.
- Try to remove yourself from the physical presence of a sexual aggressor.
- Find someone nearby and ask for help.
- Take affirmative responsibility for your alcohol intake/drug use and acknowledge that alcohol/drugs lower your sexual inhibitions and may

make you vulnerable to someone who views a drunk or high person as a sexual opportunity.

- Take care of your friends and ask that they take care of you. A real friend will challenge you if you are about to make a mistake. Respect them when they do.

If you find yourself in the position of being the initiator of sexual behavior, you owe sexual respect to your potential partner. These suggestions may help you to reduce your risk for being accused of sexual misconduct:

- Clearly communicate your intentions to your sexual partner and give them a chance to clearly relate their intentions to you.
- Understand and respect personal boundaries.
- DON'T MAKE ASSUMPTIONS about consent; about someone's sexual availability; about whether they are attracted to you; about how far you can go or about whether they are physically and/or mentally able to consent. If there are any questions or ambiguity then you DO NOT have consent.
- Mixed messages from your partner are a clear indication that you should stop, defuse any sexual tension and communicate better. You may be misreading them. They may not have figured out how far they want to go with you yet. You must respect the timeline for sexual behaviors with which they are comfortable.
- Don't take advantage of someone's drunkenness or drugged state, even if they did it to themselves.
- Realize that your potential partner could be intimidated by you, or fearful. You may have a power advantage simply because of your gender or size. Don't abuse that power.
- Understand that consent to some form of sexual behavior does not automatically imply consent to any other forms of sexual behavior.
- Silence and passivity cannot be interpreted as an indication of consent. Read your potential partner carefully, paying attention to verbal and non- verbal communication and body language.

7. Studio Incamminati Campus Security

Security on campus is handled by the Administrative Office in cooperation with the Bok Building and the Philadelphia Police Department. The Administrative Office will enforce school regulations, investigate incidents, and report students who violate these regulations or commit crimes on campus. Criminal violators will be turned over to the Philadelphia Police 3rd District, 1300 S. 11th Street, Philadelphia, PA, 215-686-3030 for arrest processing. When necessary, Studio Incamminati will press charges against criminal violators.

Studio Incamminati prepares a Campus Crime Report annually to comply with the
Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act (Clery Act). This report is prepared in cooperation with local law enforcement agencies. Nothing in the law shall be construed to permit a school to retaliate, intimidate, threaten, coerce, or otherwise discriminate against any individual with respect to the implementation of the Clery Act.

Studio Incamminati attempts to provide students and employees with a safe and secure environment in which to study and work. The school is located within the Bok Building which has its own security measures including cameras and entrance security codes. The school has no residence halls.

All studio access points should be closed and locked at all times. Access codes for the 7th floor studio entrances are given to all Full-time Advanced Fine Art Program students. Codes must be kept confidential to protect the privacy and security of the Studio Incamminati community and other building tenants.

All Studio Incamminati property must remain on the premises, including but not limited to still life props, lights, easels, books, artwork, etc. Stealing Studio Incamminati's or another student's property is grounds for dismissal from the school.

8. Personal Safety

While the school attempts to provide a safe and secure environment, students, faculty, staff, and visitors are ultimately responsible for their safety. Safety is enhanced when individuals take precautions such as:

1. Report all suspicious activity to Administrative Office immediately
2. Never take personal safety for granted.
3. Avoid walking alone at night. Travel with a friend or companion.
4. Avoid parking or walking in secluded or dimly lit areas.
5. Limit your alcohol consumption, and leave social functions that get too loud, too crowded, or that have too many people drinking excessively.
6. Carry only small amounts of cash.

7. Never leave valuables (wallets, purses, books, computers, etc.) unattended.
8. Carry your keys with you at all times and don't lend them to anyone.
9. Lock your car doors and close the windows when leaving your car.
10. Never leave valuables in your car especially if they are easily noticeable.
11. Inventory your personal property and make records of the serial numbers of all items of value.
12. Never admit anyone on school premises that is not student, teacher, or other authorized personnel.

As Studio Incamminati becomes aware of relevant programs that address responsible practices and procedures that enhance personal safety, such information will be shared with students, faculty and staff.

9. Reporting a Crime

If students, faculty, or staff are aware that a crime has been, or is being committed on school property or at a school sponsored or recognized event off- campus during the hours that the school is open, the crime should be reported as soon as possible to the Administrative Office. If the crime has been committed when the school is closed, it should be reported to the Administrative Office as soon as possible after school is open. In addition, the crime should be reported to local law enforcement authorities. The Philadelphia Police Department may be reached by dialing 911.

Studio Incamminati has the authority to determine whether individuals have lawful business at the school and may request identification to make that determination. Studio Incamminati ensures that school policies are followed and works with local law enforcement agencies and refers criminal incidents to the local police department having jurisdiction over such matters.

The Executive Director works with local law enforcement when a crime is reported. Crimes reported to the Administrative Office are included in the annual campus crime statistics. In addition, the school requests from the Philadelphia Police Department crime information not reported to the Administrative Office that is appropriate for inclusion in the annual campus crime statistics. Further, if circumstances warrant, students, faculty, and staff will be notified if an on-going threat is posed related to a reported crime.

Students, faculty, or staff who are the victim of a crime and do not want to pursue action through the school or the criminal justice system may still consider making a confidential report. The purpose of a confidential report is to comply with the request to keep the matter confidential while taking

steps to ensure future safety. Reports filed in this manner are included in the annual crime statistics for the school.

Studio Incamminati does not tolerate violence or other threatening conduct against any members of the school community including criminal acts against persons or property, as well as harassment based on sex, race, ethnicity, or disability. The school will impose strict disciplinary actions and appropriately involve law enforcement officials should any acts of violence or threatening conduct occur on school facilities or at school-sponsored events. This includes acts of violence against women.

Individuals who council a victim on behalf of the school must inform persons they are counseling of procedures to report crimes on a voluntary, confidential basis for inclusion in the annual disclosure of crime statistics.

As part of school orientation, Studio Incamminati will provide a description of programs designed to inform students and employees about the prevention of crime.

Studio Incamminati has a zero-tolerance policy regarding unauthorized alcohol on campus and will strictly enforce this policy. Anyone violating this policy will be removed from school properly and disciplinary action will be taken. Studio Incamminati has a separate drug and alcohol prevention policy which is distributed to students, faculty and staff annually.

In addition to any criminal sanctions, the school will impose appropriate disciplinary sanctions if the offender is a student or employee of the school. The Administrative Office should be contacted to file a complaint. In cases of sexual assault complaints:

- both the accuser and the accused are entitled to the same opportunities to
  have others present during the disciplinary hearing and

- both the accuser and the accused shall be informed of the outcome of any disciplinary proceeding based on an allegation of sexual assault.

If requested, Studio Incamminati will work with the victim in making as can reasonably be accommodated relative to the student's academic situation.

10. Sexual Assault and Related Crimes

In the event of a sexual assault or domestic violence, victims should be aware of the following:

- preserve any evidence of the assault (do not drink, bathe, change clothing, or comb hair, as this may destroy evidence that may be needed to prosecute the offender)
- go to a place where it is safe from further attack and notify the police

- obtain immediate medical attention
- seek professional counseling

If requested, Studio Incamminati will assist victims in notifying law enforcement. The Administrative Office will provide information on agencies that provide services to victims of a sex offense.

Studio Incamminati encourages students, faculty, and employees to take advantage of the materials and programs that promote awareness of rape, acquaintance rape, and other forcible and non-forcible sex offenses available through the school and/or local community agencies. Information about such materials and programs is available at the school.

11. Registered Sex Offenders

The Jacob Wetterling Act requires states to obtain information concerning registered sex offenders' enrollment or employment at institutions of higher education. Those seeking to obtain information about registered sex offenders should visit the National Sex Offender Public Website www.nsopr.gov. Further, to the extent the Commonwealth of Pennsylvania notifies an educational institution of information concerning registered sex offenders, the Family Educational Rights and Privacy Act (FERPA) does not prevent educational institutions from disclosing such information.

12. Disciplinary Proceedings

Studio Incamminati will, upon written request, disclose to the alleged victim of a crime of violence, or a non-forcible sex offense, the results of any disciplinary hearing conducted by the school against the student who is the alleged perpetrator of the crime or offense. If the alleged victim is deceased as a result of the crime or offense, the school will provide the results of the disciplinary hearing to the victim's next of kin, if so requested.

Studio Incamminati does not have a campus police department or security office and therefore does not keep a daily crime log. However the Administrative Office keeps an updated list of any criminal activity.

The Handbook for Campus Safety and Security Reporting is available on line from the Department of Education. This comprehensive publication was used in developing our policies.

13. Crime Statistics for our School for the Past Three Years

Criminal Offenses	2023	2024	2025	Location C=campus N=non-campus P=publicarea	Hate Crimes

Murder/Non-negligent manslaughter: The willfull (non-negligent) killing of one human being by another.	0	0	0		0
Negligent manslaughter: The killing of another person through gross negligence.	0	0	0		0
Rape: The penetration, no matter how slight, of the vagina or anus with any body part or object, or oral penetration by the sex organ of another person, without the consent of the victim.	0	0	0	P	0
Fondling: The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his or her age or because of his or her temporary or permanent mental capacity.	2	0	0		0
Incest: Sexual intercourse between two persons who are related to each other within the degrees wherein marriage is prohibited by law.	0	0	0		0
Statutory rape: The sexual intercourse with a person who is under the statutory age of consent.	0	0	0		0
Robbery: The taking or attempting to take anything of value from the care, custody or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.	0	1	1	P	0
Aggravated assault: The unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault is usually accompanied by the use of a weapon or by means likely to produce death or great bodily harm.	0	1	1		0

Criminal Offenses	2023	2024	2025	Location C=campus N=non-campus P=publicarea	Hate Crimes
Burglary: Unlawful entry of a structure to commit a felony or theft.	0	0	0		0
Motor vehicle theft: Theft or attempted theft of a motor vehicle.	1	8	6	P	0
Arson: The 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.	0	0	0		0
Domestic Violence	0	0	0		0
Dating Violence	0	0	0		0
Stalking	0	0	0		0
Simple Assault	0	0	0	P	0
Forgery	0	0	0		0
Fraud	**2**	2	0	P	0
Theft	7	0	4	P	0
Vandalism	7	2	2	P	0
Disorderly Conduct	0	0	0		0
Unfounded crimes: If a reported crime is investigated by law enforcement and is found to be false or baseless, the crime is "unfounded." Only sworn or commissioned law enforcement personnel may unfound a crime.	0	0	0		0

Violations	2023	2024	2025	Referred for campus disciplinary action (Y or N)
Liquor law violations	0	0	0	
Drug law violations	0	0	0	
Illegal weapons possession violations	0	0	0	

14. Hate Crimes

A hate crime is a criminal offense committed against a person or property which is motivated, in whole or in part, by the offender's bias. Bias is a performed negative opinion or attitude toward a group of persons based on their race, gender, religion, disability, sexual orientation, ethnicity, or national origin.

Studio Incamminati reports all hate crime statistics separately for the categories of criminal offenses listed in the chart above. Additionally, hate crimes statistics are also reported separately for the following offenses:

- Larceny-theft: is the unlawful taking, carrying, leading, or riding away of property from the possession or constructive possession of another. Constructive possession is the condition in which a person does not have physical custody or possession but is in a position to exercise dominion or control over a thing.
- Simple Assault: is an unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.
- Intimidation: is to unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack.
- Destructive/Damage/Vandalism of Property: is to willfully or maliciously destroy, damage, deface or otherwise injure real or personal property without the consent of the owner or the person having custody or control of it.

15. Residential Facilities

Studio Incamminati does not have school-operated residential facilities for students. However, the school is required in a manner that is timely and will aid in the prevention of similar crimes and report to students, faculty, and staff on the following crimes:

- Criminal homicide: murder and non-negligent manslaughter; negligent manslaughter
- Sex offenses—forcible and non forcible
- Robbery
- Aggravated assault
- Burglary
- Motor vehicle theft
- Theft
- Arson
- Arrests for liquor law violations, drug law violations and illegal weapons possession including persons who were referred for disciplinary action.
- Hate crimes—evidence that shows the victim was intentionally selected because of the victim's actual or perceived race, gender, religion, sexual orientation, ethnicity or disability
- Crimes reported to the Administrative Office or local police and considered by the school to represent a threat to students and employees

Studio Incamminati is not required to provide a timely warning with respect to crimes reported to a pastoral or professional counselor. If there is an immediate threat to the health or safety of students or employees occurring on campus, the school will follow its emergency notification procedures.

16. Emergency Response—Campus Community

Beginning October 2010, all Title IV participating institutions must have a statement of policy on emergency response and evacuation procedures.

Studio Incamminati has instituted a plan to notify students, faculty, and staff upon confirmation of a significant emergency or dangerous situation involving an immediate threat to health or safety. An immediate threat encompasses an imminent or impending threat, such as a fire in the building or nearby structure. Employees who perceive an immediate threat toward any other person on the school premises should call emergency 911.

The Administrative Office has set up an e-mail group that will reach all current students, faculty and administration to inform them of any

emergency on campus.
The evacuation plan is the same as the fire evacuation plan which is posted throughout the building. All personnel will be advised of this plan each year.

Studio Incamminati will without delay, take into account the safety of the community, determine the content of the notification, and initiate the notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to or otherwise mitigate the emergency. Faculty and staff members should remain in the room with their students if they are notified of a possible emergency.

An Emergency Committee, consisting of the Executive Director, Director of Operations and the Financial Administrator will confirm that there is a significant emergency, determine who to notify, content of the notification, and initiate the notification system. The committee will call the Philadelphia Police Department and/or Fire Department as needed.

The Clery regulations define a test as regularly scheduled drills, exercises and appropriate follow-through activities designed for assessment and evaluation of emergency plans and capabilities.

A. A Timely Warning

The Clery Act requires Studio Incamminati to alert students, faculty, and staff of certain crimes in a manner that is timely and will aid in the prevention of similar crimes. The Clery Act does not define “timely” because the intent of a warning is to enable people to protect themselves and should be issued as soon as the pertinent information is available.

In summary, Studio Incamminati will:

- Confirm there is a significant emergency or threat
- Determine appropriate segment of the building to receive notification.
- Determine the content of the notification
- Initiate notification system
- Include a statement that the school will without delay and accounting for safety of the students, faculty and staff, and determine the content and initiate notification system, unless issuing a notification will compromise efforts to assist a victim or to contain, respond or otherwise mitigate the emergency.
- Include procedures for disseminating emergency information to larger community.

- Include procedures for testing emergency response evacuation on at least an annual basis.

B. Personal Responsibility for Safety

Although Studio Incamminati will make every effort to ensure the safety of its students, faculty, and staff, there is no substitute for common sense, nor can safety procedures be devised to cover every situation. Good judgment must be used in every situation.

The following are the responsibility of individual students, faculty members, and staff:

- Follow approved practices and procedures or standards which apply on any work you perform for the school.
- Report to instructor or Administrative Office any condition which might injure any person or damage any property.
- Any injury which occurs at school, no matter how slight, or any accident that causes damage to property shall be reported immediately to the Administrative Office
- If anyone observes another who is about to endanger themselves, another person, or property while at the School, they should intervene immediately

in such a way as to not endanger themselves.
- Unauthorized alcoholic beverages are not permitted on the school property and use of such is prohibited. No one is to report for work or class evidencing any effects of alcoholic consumption.
- Controlled substances, such as marijuana and cocaine, are illegal by state and federal law. Their use and possession are prohibited on school property.
- Liquids such as water or oil, excessive dust/dirt, or any other debris spilled on floors represent serious slipping hazards and should be cleaned up immediately upon observation.

C. Accident Investigation and Reporting

Any injury occurring at school must be promptly reported to the Administrative Office no later than end of the period on the day in which the injury occurred. All accidents will be investigated to determine the cause and the steps needed to prevent a recurrence. It shall be the responsibility of the instructor to obtain the complete and detailed facts of the accident as soon as possible after it occurs and to see that the required reports are made to the Administrative Office.

D. Firearms

Firearms, ammunition, explosives or other weapons are prohibited on the school property with the exception of law enforcement agencies.

E. Good Housekeeping

Good housekeeping is essential to safe operation. It will result in fewer accidents and will reduce fire hazards. All spills should be cleaned up promptly to eliminate slipping and fire hazards. All work areas must be kept free of debris and other objects which create hazards. Cleaning up the area where you are working is part of the classes.

F. Responsibility

It is the responsibility of everyone to be aware of the hazards related to the use of solvents, chemical cleaning materials, and other chemicals and to enforce the rules related to their use.

Hazards to be considered when using solvents, chemical cleaning materials, and other chemicals are:

- Contact with a hazardous material can cause skin rash or dermatitis, corrosive burns or eye damage.
- Potential explosive or fire hazard.
- The danger of ingestion of a poisonous, corrosive, or hazardous substance through the month or absorbed through the skin.

G. First Aid

First aid procedures vary depending on the chemical nature of the materials in question. Follow the instructions on the container label. In the event that a person should come in contact with solvent or chemicals in the eyes or on the skin, the affected area should be irrigated for a minimum of fifteen (15) minutes. If
anyone ingests chemical materials or is splashed with a hazardous material and irrigation facilities are not available, they should immediately be referred to a hospital emergency room.

17. Severe Weather

A. Tornado

If in the judgment of the Executive Director or administrator in charge the treat of impending danger warrants it, the following actions may be taken:

- Dismissal of all classes and assembly of students and employees into interior hallways and away from glass windows, doors and partitions.

- Everyone should remain in these “safe” areas until in the opinion of the Executive Director the threat of danger is past.
- If the tornado or destructive wind strikes the building, everyone should sit on the floor, with backs against the wall, their heads between their knees, and their hands clasped over the backs of their heads until all danger is past.

B. Flooding

Because of the elevation of the building, the school is not likely to flood. However, during periods of flooding, the Executive Director will remain in contact with appropriate authorities and will keep both students and employees advised of local road conditions.

C. Ice and Snow

In the event that ice and/or snow threaten to make highway travel hazardous, the Executive Director may dismiss classes to allow students, faculty, and staff to return home safely.

D. Closing the School as the Result of Severe Weather

Only the Executive Director has the authority to close the school. When this action is taken, the director will notify the students and faculty. Students can call 215- 592-7910 by 7 a.m., or at least two hours prior to the start of a workshop or continuing education class. An email message will be sent if the studio is closed for the day and will also be noted on the Studio Incamminati website.

Students, faculty, or staff should not attend school if, by their opinion or by the warning of law enforcement officials, travel conditions in their area are unsafe or if other circumstances would place their lives/health in jeopardy.

18. Critical Incident Response Plan

A. Objectives

1. To coordinate the School’s response to critical incidents while pay special attention to the safety and security needs of students, faculty, and staff.
2. To maintain the safety and security of faculty, staff and students as a whole in the event of a critical incident.
3. To help provide counseling, guidance, and appropriate support services to the families and friends of students, faculty, and staff in the event of a critical incident.

B. Definition of a Critical Incident

A critical incident is a situation that involves Studio Incamminati that creates a major disruption of normal operations and calls for a response beyond normal school operational procedures. Examples may be situations such as natural/ structural disasters, violent behavior or life threatening injury or illness. This plan is for general information only. During an actual critical incident, variations might be made depending on the nature of the event and the situation.

19. Student Assistance Services

A. Personal Counseling Referrals

The Executive Director will act as the referral agent for student seeking assistance for emotional or personal counseling services.

Studio Incamminati

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