

Great Lakes Boat Building School
Annual Security Report
Jeanne Clery Disclosure of Campus Security Policies and Crime Statistics

Introduction

Great Lakes Boat Building School (GLBBS) policy is to promote a safe campus environment. GLBBS is committed to maintaining a campus free from violence, threats of violence, harassment, intimidation, and other disruptive behaviors.

GLBBS complies with federal law in compiling an annual security report, which contains policy statements and crime statistics. The policy statements address the institution's policies, procedures and programs concerning safety and security, such as policies for responding to emergency situations and sexual offenses. In accordance with the Jeanne Clery Act, three years' worth of statistics are included for certain types of crimes that were reported to have occurred on campus, in or on off-campus buildings or property owned or controlled by the school, and on public property within or immediately adjacent to the campus. This report is available on the GLBBS website. Students may also request a paper copy from the School administration.

History of the Jeanne Clery Act

The Clery Act was advocated by Howard and Connie Clery after their 19-year old daughter Jeanne was murdered in her dorm room at Lehigh University in 1986. Following her death, her parents lobbied Pennsylvania lawmakers for legislation requiring colleges and universities to publish their crime statistics. The Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act is a federal law that requires colleges and universities to disclose certain timely and annual information about campus crime and security policies. All public and private institutions of post-secondary education participating in federal student aid programs are subject to it.

Annual Security Report

GLBBS collects crime statistics on a daily and annual basis. These statistics are compiled into a daily crime log and reported annually to the Department of Education to comply with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act, as well as state and federal (UCR; Uniform Crime Reports) laws.

GLBBS makes a good faith effort to obtain crime statistics from Campus Security Authorities (CSAs) which include the President, Admissions & Career Services Advisor, Instructional Staff and Registrar. The report is prepared in cooperation with the Mackinac County Sheriff's Office.

The Annual Security Report is completed by October 1st of each year. The report contains three years' worth of campus crime statistics and the required security policy statements including sexual assault policies which assure basic victims' rights and where students should go to report crimes. The most recent Annual Security Report is posted on the school website and available in hard copy from the school administrator. Staff, students, and prospective students are provided with a description of its contents and information on how to access the report and how to obtain a hard copy.

Campus Security Authority and Jurisdiction

GLBBS administration attempts to provide a safe, secure educational environment for all students and employees. The school does not provide security guards on its campus premises. The ultimate authority for law enforcement at the school is the Mackinac County Sheriff's department. GLBBS does not have any written agreements with local police departments for the investigation of alleged criminal offenses. School officials have the authority to contact the local police to request assistance in preventing or reacting to crime within or in the immediate vicinity of school facilities. The President is the school's coordinator of security issues. The Campus Security Authorities mentioned above are not authorized to arrest individuals but do have the authority to detain suspected criminal offenders if it is deemed safe to do so. The administration at GLBBS has a strong, working relationship with the local police and work in partnership to offer students and employees the safest possible environment.

Criminal Activity Off Campus: GLBBS does not provide law enforcement services to off- campus activities on behalf of the school.

Reporting a Crime or Emergency

Security is achieved through the cooperation and participation of all members of the GLBBS. All staff, faculty, students, and visitors are strongly encouraged to report any crime, suspicious circumstance, accident, theft, or safety issue to one of the Campus Security Authorities listed below in a timely manner. Reported incidents will be forwarded to the appropriate personnel or law enforcement agency for immediate resolution.

Nikki Storey, President	(906) 440-6829
Sherry Lovegrove, Operations Manager	(906) 906-1081

For off campus options you may contact the Mackinac County Sheriff's Department at **(906) 643-1911** for non-emergencies. You should always dial 9-1-1 for emergencies. The Mackinac Country Sherriff's Department encourages anyone who is the victim or witness to any crime to promptly report the incident to the police. Because police reports are public records under state law, the Mackinac County Sheriff's Department cannot hold reports of crime in confidence. However, individuals can file anonymous crime tips with the Mackinac County Sheriff's Department Criminal Tip line – (906) 643-1165

GLBBS encourages anyone who is the victim or witness to any crime to promptly report the incident to the sheriff. The GLBBS does not have a voluntary, confidential reporting system, however, students and stuff are encouraged to share any concerns with one of the Campus Security Authorities listed above.

Timely Warnings

In the event that a situation arises, either on or off campus, that, in the judgment of the President constitutes an ongoing or continuing threat, a campus wide "timely warning" will be issued. The President will immediately notify the GLBBS community uponthe confirmation of a significant emergency or dangerous situation involving an immediate threat to the health or safety of students or staff occurring at the school, unless issuing a notification will compromise efforts to contain the emergency.

The President is responsible for deciding when to issue a timely warning. He/she will consult with the necessary Campus Security Authorities or other individuals to carefully identify the severity of a situation and whether it requires a timely warning. The decision process to issue a timely warning will be made on a case-by-case basis.

A timely warning will be issued as soon as pertinent information is available. The warning will be disseminated to staff and students through announcements in campus facilities, cell phone messages, e-mail, school website, social media and/or flyers to ensure that the entire campus is likely to receive the warning. The timely warning will include information that promotes safety and tips to prevent similar crimes, allowing the campus community to take appropriate precautions. The timely warning will also include the time, location, and type of crime reported.

Emergency Notification and Response Procedures

Emergencies that post an immediate threat to the health or safety of any campus community members or its facilities will be communicated to the affected body of the community by a variety of delivery methods appropriate to the specific threat.

The following definitions of emergency are provided as guidelines to assist in determining the appropriate response.

Minor Emergency: Any incident, potential or actual emergency, which will not seriously affect people or the overall functional capacity of the school.

Major Emergency: Any incident, potential or actual emergency, which significantly affects people and/or a large portion of the campus and which will disrupt the overall operations of the school.

Disaster: Any event or occurrence which has taken place and has seriously impaired or halted the operation of the school. In some cases, mass casualties and severe property damage may be sustained. A coordinated effort of all campus and emergency resources is required to effectively help with response to this level of emergency.

After determining the significance of the emergency, GLBBS will issue an emergency notification including specific information regarding the emergency, allowing the campus community to take appropriate precautions.

The following methods of communication will be used during an emergency situation without delay. They may be used individually or in concert with others:

- Announcements in campus facilities (office, classrooms, shops)
- Cell phone (voice and/or text messages)
- Email
- GLBBS website
- Social media
- Flyers

Fire Prevention

GLBBS is committed to minimizing the threat of fire by complying with the Occupational Safety and Health Administration's (OSHA) standard on fire prevention: 29 CFR 1910.39. The President is responsible for training students and administrative staff in fire prevention and response. This training occurs during new hire and new student orientation and as needed to address specific safety concerns.

Fire drills are conducted annually. The President keeps a record of these tests, reports results to the Executive Committee, and addresses any areas for improvement in consultation with Clark Township Fire Department.

Emergency Procedures

Emergency procedures are located in every classroom and in every administrative department on the GLBBS campus. The procedures outline detailed processes for various emergency situations that may arise. New employees review the procedures during their orientation with the President. New students review the procedures on their first day of class with their instructor.

Security and Access to the Facilities

GLBBS administrative office are open Monday through Friday from 8:00 am to 4:30 pm, with occasional evening hours. Access to the facilities is limited and controlled by instructors or GLBBS administrative staff.

Student and School security is of utmost importance. The School has an obligation to ensure that students, employees, and guests are safe; and that the facility is secure. Passcodes are given to students during orientation and should not be shared with non-school related personnel. Passcodes are changed throughout the year as deemed necessary by GLBBS.

The School's front main entrance is used by guests and staff. The back entrance will be used for students and faculty.

Student Housing

GLBBS does not provide housing for students and therefore does not have a policy pertaining to this area

Maintenance of Facilities and Grounds

The President ensures that facilities and grounds are maintained in a manner that promotes security and minimizes hazardous conditions.

Prompt Reporting of Crimes

All students, faculty, staff, and visitors are strongly encouraged to report any crime, suspicious activity, accident, theft, or safety issue to a Campus Security Authority and appropriate law enforcement agencies promptly. If the situation poses an immediate threat, call 911. All crimes should be reported to the President, regardless of severity, to ensure inclusion in the annual crime statistics and to aid in providing a timely warning notice or emergency notification to the campus when appropriate.

Pastoral or Professional Counselors

Professional, licensed counselors and pastoral counselors who provide mental-health counseling to members of the community (and including those who act in that role under the supervision of a licensed counselor) are not required to report any information about an incident to the school or local law enforcement without a victim's permission. GLBBS does not provide professional or pastoral counseling but can assist a crime victim in obtaining support services from these groups or agencies.

GLBBS Campus Safety and Security Education

Students review the Student Catalog with the President and Instructor (s) at the beginning of their training. This includes reviewing the emergency procedures in the Student Catalog and the student's responsibility to actively support and participate in the school's effort to provide a safe and healthy environment. After reviewing the content, students are given an opportunity to ask questions, and sign to acknowledge they received the Catalog.

Employees meet with the President at the beginning of their employment; this includes reviewing the emergency procedures in the Employee Handbook and the employee's responsibility to participate in their security and the security of others. After reviewing the content, employees are given an opportunity to ask questions, and then sign the acknowledgement form. This information is reviewed on an annual basis or as soon as significant changes are made to the procedures.

Crime Prevention Education

GLBBS takes a proactive approach to crime on campus by offering information to students and staff, such as Crime Prevention tips. In addition, information is disseminated to students and employees through tips posted in the school buildings, in-class announcements, and announcements through social media.

Possession, Use and Sale of Alcoholic Beverages and Illegal Drugs

In accordance with the Drug-Free Schools and Communities Act amendments of 1989, Public Law 101-226, GLBBS is hereby declared a drug and alcohol-free school and workplace. Alcohol includes beer, wine, grain alcohol, and liqueur.

Illegal drugs include but are not limited to the following non-prescription substances: narcotics, depressants, stimulants, hallucinogens.

Students and employees are prohibited from the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance or alcohol anywhere on property belonging to the School including grounds, parking areas, or while participating in School-related activities. Students or employees who violate this policy will be subject to disciplinary action up to and including expulsion or termination of training or employment.

Standards of Conduct

In accordance with Michigan State Law:

The legal drinking age in Michigan is 21. Persons under the age of 21 may not consume, purchase, or possess alcohol.

It is unlawful for persons under the age of 21 to misrepresent their age for the purpose of purchasing alcohol.

It is illegal to possess, consume, and/or sell illicit drugs.

Legal Sanctions under local, state and federal law.

Persons convicted of violations of the Drug-Free Schools and Communities Act, law 101-226, may have legal sanctions imposed against them that include any or all of the following:

Mandatory participation in a substance abuse rehabilitation program approved for such purposes by a federal, state, local health, law enforcement, or other appropriate agency.

Penalties including fines and/or incarceration in local, state, or federal prison facilities.

Associated Health Risks

The GLBBS recognizes that drug and alcohol abuse and dependence can cause harmful effects to virtually every aspect of a person's life, including relationships, family, job, and school, as well as physical and emotional health. Any student or employee with concerns regarding drug and alcohol use or who would like further information on drug and alcohol education and services in the community is encouraged to speak with the Student and Career Services Coordinator. Any issues discussed will be kept confidential.

Drugs and their dangers vary. Some drugs have legitimate medical uses but can lead to psychological and physical dependence. Others so affect the central nervous system that they render the user dangerous to themselves and others. People under the influence of drugs may be an extreme danger to themselves and others in a boat shop or on the water. These risks may include:

- The risk of dependence
- Possible short-term effects
- Possible long-term effects
- The effects of an overdose

Counseling, Treatment or Rehabilitation Resources

Treatment Options	Great Lakes Recovery Intensive Outpatient http://www.greatlakesrecovery.org/recovery-services/outpatient-services/ (906) 632-9809
	Hiawatha Behavioral Health http://www.hbhcmh.org/ (906) 643-8616
	War Memorial Psychiatric https://www.warmemorialhospital.org/behavioral-health-services-51/ (906) 495-2209
Alcoholics and Narcotics Anonymous Meeting Locations	(906) 253-9364

Policy Exceptions

Exceptions to this policy may be approved by the President or Executive Committee of the Board of Directors.

Sexual Misconduct Policy & Procedures for Responding to Sexual Misconduct

Introduction

Great Lakes Boat Building School (GLBBS) is committed to providing a working and educational environment for all students, faculty and staff that is free from sex discrimination, including sexual misconduct. Every member of the GLBBS community should be aware that the school is strongly opposed to sexual misconduct, and that such behavior is prohibited by state and federal laws.

As part of GLBBS' commitment to providing a working and learning environment free from sexual misconduct, this Policy shall be disseminated widely to the school community through publications, the school website, new employee orientations, student orientations, and other appropriate channels of communication. The school provides training to key staff members to enable the school to handle any allegations of sexual misconduct promptly and effectively.

GLBBS will respond quickly to all reports of sexual harassment, and will take appropriate action to prevent, to correct, and if necessary, to discipline behavior that violates this policy.

Scope of the Policy

This Policy governs sexual misconduct involving students that occurs on any school property or in connection with any school-sponsored program or event. This Policy applies to all students, employees, and third parties conducting business with GLBBS, regardless of the person's gender, gender identity, sexual orientation, age, race, nationality, class status, ability, religion or other protected status. GLBBS encourages victims of sexual violence to talk to somebody about what happened – so victims can get the support they need, and so the school can respond appropriately. As further described in this Policy, GLBBS will seek to respect a victim's request for confidentiality to the extent possible, while remaining ever mindful of the victim's well-being.

Prohibited Conduct

Sexual misconduct comprises a broad range of behaviors focused on sex that may or may not be sexual in nature. Any intercourse or other intentional sexual touching or activity without the other person's consent is sexual assault, which is a form of sexual misconduct under this Policy. Sexual harassment and sexual exploitation, stalking, domestic violence, and dating violence are also forms of sexual misconduct. Intimidation for one of these purposes is sexual misconduct, as is retaliation following an incident of alleged sexual misconduct or attempted sexual misconduct. The definitions for specific acts of sexual misconduct can be found in the Definitions of Key Terms at the end of this Policy statement.

Misconduct can occur between strangers or acquaintances, or people who know each other well, including between people involved in an intimate or sexual relationship, can be committed by anyone regardless of gender identity, and can occur between people of the same or different sex or gender.

This Policy prohibits all forms of sexual misconduct.

Options for Assistance Following an Incident of Sexual Misconduct

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

Reporting Incidents of Sexual Misconduct

Victims of sexual misconduct may file a report with the local police department. Victims may also file a report with the school's Student & Career Services Coordinator. More information about reporting an incident of sexual misconduct can be found in Section 6 of this Policy, below.

When a student or employee reports to the school that the student or employee has been a victim of dating violence, domestic violence, sexual assault, or stalking, whether the offense occurred on or off campus, the school will provide the student or employee a written explanation of the students or employee's rights and options.

The victim of the sexual misconduct may choose for the investigation to be pursued through the criminal justice system and school's disciplinary procedures. The school and the criminal justice system work independently from each other. Law enforcement officers do not determine whether a violation of this Policy has occurred. The Student & Career Services Advisor will guide the victim through the available options and support the victim in his or her decision.

Support Services Available

Counseling, advocacy and support services are available for victims of sexual misconduct, whether or not a victim chooses to make an official report or participate in the school's disciplinary or criminal process. GLBBS does not provide counseling or health care services. Personal counseling offered by the school will be limited to initial crisis assessment and referral.

Sexual misconduct crisis and counseling options are available locally and nationally through a number of agencies, including:

National Resources:

National Sexual Assault Hotline: (800-656-4673 National Domestic Violence Hotline: (800) 799-7233

Local Resources:

Mackinac County Sheriff's Office

Non-Emergency: (906) 643-1911

Emergency: 9-1-1

Counselors, Advocates and Health Care Providers

The list provided below is not comprehensive and is for informational purposes only. GLBBS does not endorse or approve of any person or organization on the list.

Mackinac County Resource List	
Mental Health Counseling	
A Therapy World/Jennifer Olmstead, MSW	906-632-2273
Bay Mills Mental Health Services	906-248-3204
Catholic Human Services - Cheboygan	231-627-9917
Great Lakes TTC child & adult	231-487-2415
Hiawatha Behavioral Health Crisis Services	906-643-8616 or 1-800-839-9443
Hidden Brook Counseling	231-487-1885
Lake Superior State University Counseling Services	906-632-6841
Marquette General Hospital Outpatient Psychiatry	800-562-9753
Old Town Psychological Services	989-448-8344 or 231-941-6550
Rainbow's End Counseling/Consulting	906-635-1390
Sault Tribal Mental Health Services	906-635-6075
Stephanie Soblaskey Therapist	906-643-1592
UP North Psychological Services	906-259-5022
War Memorial Psychiatric	906-495-2209
Weber & Devers Psychological Services	906-635-7270
Substance Abuse	
AA & NA Meeting Information	906-253-9364
Great Lakes Recovery Intensive Outpatient	906-632-9809
Harbor Hall - Cheboygan	231-597-9235
Men's New Hope	906-635-5542
New Leaf Substance Abuse Services - Julie Joseph-Barber	906-635-7270
Sault Tribe Substance Abuse	906-643- 8689
Women's New Hope	906-635-2522
Other	
Anishnaabek Community & Family Services	906-643-8689
Cedar Post Thrift Shop & Food Pantry - Cedarville	906-484-9512
Community Action Agency	906-643-8595
Community Health Access- CHACC (For those without health insurance)	906-643-7253
Dial Help Text Line	906-356-3337
Diane Peppler Shelter	906-643-0498
EUP Community Dispute Resolution	906-253-9840
EUP Home Health & Hospice	906-635-1568
Evergreen Living Center (Long Term Care)	906-643-0411
Food Pantry - Engadine (M -9-3; T-9-12; WFSa-12-3)	906-477-1050
Food Pantry - St. Ignace (MWF 2-4p.m.)	906-643-7360
Hope Chest Thrift Store (T 10-4, W 12-5, Th 10-4)	906-643-7360
Hope Chest Hotline 24/7	906-643-6780
Hope Network - April Goeschel RN, Program Director	906-298-8000
Hessel Tribal Center	906-484-2727
H.O.M.E. (Housing assistance)	906-643-6239
Hospice and Grief Support Group	906-253-3151
Lake Superior State University Accessibility Department	906-635-2355
Legal Services of Northern Michigan	906-632-3361
LMAS District Health Dept. (Infant and Maternal Support Services)	906-643-1100
Mackinac County Housing Commission - Curtis	906-586-3414
Mackinac County Department of Health & Human Services (MDHHS)	906-643-9550
Mackinac Straits Hospital & Physicians	906-643-8585 906-643-0466
Michigan Department of Career Development Rehabilitation (MRS)	800-562-7860 906-635-1341
Michigan Works! Service Center	906-643-8158
MSU Cooperative Extension Service	906-643-7307
Nehemiah Project Homeless Shelter: Petoskey	
*** Mary Margaret House (Women & Families)	231-347-0363
*** Hospitality House for Men	231-347-0363
Safe Haven Homeless Shelter - Soo Housing	906-632-3344
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Religious Organizations

The list provided below is not comprehensive and is for informational purposes only. GLBBS does not endorse or approve of any person or organization on the list.

Bethel Lutheran Church	Cedarville	(906) 484-2730
Church of Nazarene	Pickford	(906) 647-2558
Detour Union Presbyterian Church	Detour	(906) 297-2341
First Union Church (Non-denominational)	Cedarville	(906) 484-3638
Hessel Presbyterian Church	Hessel	(906) 484-2124
Les Cheneaux Community Fellowship (Non-denominational)	Cedarville	(906) 484-2966
Pickford Presbyterian	Pickford	(906) 647-2595
Pickford United Methodist Church	Pickford	(906) 647-6195
Our Lady of the Snows Catholic Church	Hessel	(906) 297-5211
Stalwart Community Presbyterian Church	Pickford	(906) 647-2090

The Student & Career Services Coordinator will work with all students affected by sexual misconduct to ensure their safety and support their wellbeing. This assistance may include providing accommodations to support or protect a student after an incident of sexual misconduct and while an investigation or disciplinary proceeding is pending. Such accommodations may include the ability to change programs, withdraw from/retake a program without penalty, and access academic support (e.g., tutoring). GLBBS may be able to provide additional interim measures

Evidence Preservation

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

President

The President is responsible for monitoring and overseeing GLBBS's compliance with Title IX and the prevention of sexual harassment, sexual misconduct and discrimination. The President is:

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

Inquiries or concerns about Title IX may be referred to the school's President:

Nikki Storey
(906) 484-1081
Email: nikki.storey@glbbs.edu

Reporting Policies and Protocols

GLBBS strongly encourages all members of the school community to report information about any incident of sexual misconduct as soon as possible, whether the incident occurred on or off campus. Reports can be made either to the school and/or to law enforcement.

Reporting to the School

An incident of sexual misconduct may be reported directly to the Student & Career Services Coordinator. If the Student & Career Services Coordinator is the alleged perpetrator of the sexual misconduct, the report should be taken directly to the President. Filing a report with a school official will not obligate the victim to prosecute, nor will it subject the victim to scrutiny or judgmental opinions.

An individual who has experienced an incident of sexual misconduct may report the incident at any time, regardless of how much time has elapsed since the incident occurred. GLBBS is committed to supporting the rights of a person reporting an incident of sexual misconduct to make an informed choice among options and services available.

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

Reporting to Law Enforcement

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

Ensure that a victim of sexual assault receives the necessary medical treatment and tests

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

Assure the victim has a referral to confidential counseling from counselors specifically trained in the area of sexual assault

Reporting of Crimes & Annual Security Reports

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

Each year the Institute prepares this report to comply with the Clery Act. The full text of this report can be located on the school's web site at www.glbbs.edu. This report is prepared in cooperation with the local law enforcement agencies around our campus. Each year notification is made to all enrolled students and employees that provides the web site to access this report. Copies of the report may also be obtained in person from the Operations Office or by calling (906) 484-1081. All prospective employees may obtain a copy from the Admissions Advisor.

Timely Warnings

In the event that a situation arises, either on or off campus, that, in the judgment of the President constitutes an ongoing or continuing threat, a campus wide "timely warning" will be issued. The warning will be disseminated to

staff and students through announcements in campus facilities, cell phone messages, e-mail, school website, social media and/or flyers to ensure that the entire campus is likely to receive the warning. The timely warning will include information that promotes safety and tips to prevent similar crimes, allowing the campus community to take appropriate precautions. The timely warning will also include the time, location, and type of crime reported. Anyone with information warranting a timely warning should report the circumstances to the President by phone at (906) 484-1081 or in person at the school.

Third-Party and Anonymous Reporting

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

No Retaliation

GLBBS prohibits retaliation against those who file a complaint or third-party report, or otherwise participate in the investigative and/or disciplinary process (e.g., as a witness). The school will take strong responsive action if retaliation occurs. Any incident of retaliation should be promptly reported to the President.

Coordination with Drug Free School Policy

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

School Policy on Confidentiality

GLBBS encourages victims of sexual misconduct to talk to somebody about what happened – so victims can get the support they need, and so the school can respond appropriately.

This policy is intended to make students aware of the various reporting and confidential disclosure options available to them – so they can make informed choices about where to turn should they become a victim of sexual misconduct. The school encourages victims to talk to someone identified in one or more of these groups.

Privileged and Confidential Communications – Professional & Pastoral Counselors Professional, licensed counselors and pastoral counselors who provide mental-health counseling to members of the community (and including those who act in that role under the supervision of a licensed counselor) are not required to report any information about an incident to the President a victim's permission. GLBBS does not provide professional or pastoral counseling, but can assist a victim of sexual misconduct in obtaining support services from these groups or agencies. Contact information for these support organizations is listed in Section 4 of this Policy.

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

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

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

Reporting to "Responsible Employees"

A “responsible employee” is a GLBBS employee who has the authority to redress sexual violence, who has the duty to report incidents of sexual violence or other student misconduct, or who a student could reasonably believe has this authority or duty.

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 President all relevant details about the alleged sexual violence shared by the victim and that the school will need to 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.

The following responsible employees can be reached at (906) 484-1081.

Matthew Edmondson	Lead Instructor	Matt.edmondson@glbbs.edu
Matt Dost	Student & Career Services Advisor	Matt.dost@glbbs.edu
Nikki Storey	President	Nikki.storey@glbbs.edu

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 GLBBS 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 President, the responsible employee will also inform the President 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 for GLBBS to fully investigate an incident. By the same token, responsible employees will not pressure a victim to make a full report if the victim is not ready to.

Reporting to President

When a victim tells the Student & Career Services Advisor about an incident of sexual misconduct, the victim has the right to expect GLBBS to take immediate and appropriate steps to investigate what happened and to resolve the matter promptly and equitably.

To the extent possible, information reported to the Student & Career Services Advisor will be shared only with people responsible for handling the school’s response to the report. The Student & Career Services Advisor 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 the Student & Career Services Advisor, the Student & Career Services Advisor should ensure that the victim understands the Student & Career Services Advisor’s reporting obligations – and, if the victim wants to maintain confidentiality, direct the victim to confidential resources. If the victim wants to tell the Student & Career Services Advisor what happened but also maintain confidentiality, the Student & Career Services Advisor should tell the victim that the school will consider the request, but cannot guarantee that the school will be able to honor it.

The Student & Career Services Advisor will not pressure a victim to request confidentiality, but will honor and support the victim's wishes, including for the school to fully investigate an incident. By the same token, the Student & Career Services Advisor will not pressure a victim to make a full report if the victim is not ready to.

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

If a victim discloses an incident to the Student & Career Services Advisor but wishes to maintain confidentiality or requests that no investigation into a particular incident be conducted or disciplinary action taken, GLBBS must weigh that request against the school's obligation to provide a safe, non-discriminatory environment for all students, 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 for all students.

The Student & Career Services Advisor will evaluate requests for confidentiality. When weighing a victim's request for confidentiality or that no investigation or discipline be pursued, the Student & Career Services Advisor will consider a range of factors, including the following:

The increased risk that the alleged perpetrator will commit additional acts of sexual misconduct or other violence, such as:

- whether there have been other sexual misconduct 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 misconduct or other violence against the victim or others;
- whether the sexual misconduct was committed by multiple perpetrators;
- Whether the sexual misconduct was perpetrated with a weapon;
- Whether the victim is a minor;
- Whether the school possesses other means to obtain relevant evidence of the sexual misconduct (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 and, if appropriate, pursue disciplinary action. If none of these factors is present, the school will likely respect the victim's request for confidentiality.

If GLBBS 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;
- provide other security and support, which could include issuing a no-contact order, helping arrange a change of program (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 local law enforcement – and provide the victim with assistance if the victim wishes to do so.

The school may not require a victim to participate in any investigation or disciplinary proceeding.

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 GLBBS 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.

Miscellaneous

Investigation Procedures and Protocols

The President oversees GLBBS’ investigation, response to, and resolution of all reports of prohibited sexual misconduct, and of related retaliation, involving students, faculty, and staff. The President will designate a specially trained investigator (or team of investigators) to interview the complainant, respondent and any witnesses. The investigator will also gather pertinent documentary materials (if any) and other information.

Notice of Investigation

The President will inform the complainant before starting an investigation. The complainant may request that an investigation not be undertaken. The President will consider such a request in light of the school’s commitment to provide a safe and non- discriminatory environment for all students. If the President determines not to investigate, she will notify the complainant in writing, including that the determination was made at the complainant’s request. At the complainant’s request, the President will also notify the respondent in writing, including that the complainant asked the school not to investigate.

The investigator will direct the complainant, respondent, witnesses and other interested individuals to preserve any relevant evidence.

If an investigation proceeds, the school will notify the respondent in writing that a report has been filed. The notice will describe the allegations in the report. The complainant and respondent will be given the opportunity to meet separately with the President to review the Policy and these Procedures.

Investigation Process

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

The investigator will interview the complainant, respondent and any witnesses. They will also gather pertinent documentary materials (if any) and other information.

Time Frame for Investigation

Consistent with the goal to maximize educational opportunities and minimize the disruptive nature of the investigation and resolution, the President seeks to resolve all reports in a timely manner. In general, an investigation may last up to 30 days, from receipt of written notice from the complainant of the intent to proceed with an investigation. Adjudication will generally take up to 30 days from the date the investigative report is provided to both the complainant and the respondent. The President may set reasonable time frames for required actions under the Policy. Those time frames may be extended for good cause as necessary to ensure the integrity and completeness of the investigation, comply with a request

Take Back the Night and other public awareness events. Public awareness events such as “Take Back the Night,” the Clothesline Project, candlelight vigils, protests, “survivor speak outs” or other forums in which students disclose

incidents of sexual violence, are not considered notice to GLBBS of sexual misconduct for purposes of triggering its obligation to investigate any particular incident(s). Such events may, however, inform the need for campus-wide education and prevention efforts.

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

By external law enforcement, accommodate the availability of witnesses, accommodate delays by the parties, account for school breaks or vacations, or address other legitimate reasons, including the complexity of the investigation (including the number of witnesses and volume of information provided by the parties) and the severity and extent of the alleged conduct. Any extension of the timeframes, and the reason for the extension, will be shared with the parties in writing. Best efforts will be made to complete the process in a timely manner by balancing principles of thoroughness and fundamental fairness with promptness.

Where necessary, the school will take immediate steps to protect complainants pending the final outcome of an investigation, including academic accommodations and other interim measures. These steps may include the ability to change programs; withdraw from/retake a class without penalty; access academic support such as tutoring; issue no contact orders; and change the alleged perpetrator's program.

Impact of Victim's Confidentiality Request

A victim's request for confidentiality will likely limit the school's ability to investigate a particular matter. The school may take steps to limit the effects of the alleged sexual misconduct and prevent its recurrence without initiating formal action against the alleged perpetrator or revealing the identity of the student complainant. Examples include: providing increased monitoring, supervision, or security at locations or activities where the misconduct occurred; providing training and education materials for students and employees; revising and publicizing the school's policies on sexual misconduct; and conducting climate surveys regarding sexual misconduct.

Investigation Report

The investigator will prepare a report detailing the relevant content from the interviews and the documentation gathered. The report will include the assessment of individual credibility and recommended findings of responsibility.

The respondent and complainant will each have the opportunity to review a copy of the investigative report and any other information used during the disciplinary proceedings. The names and other identifying information of other students will be redacted from such materials in accordance with the Family Educational Rights and Privacy Act (FERPA), except to the extent that doing so would interfere with the purpose of Title IX to eliminate sex-based discrimination.

Upon receipt of the investigative report, the complainant and respondent shall each have the opportunity to request a hearing be conducted pursuant to the procedures set forth in Section 9, below. If neither party requests a hearing within 10 calendar days from their receipt of the investigative report, then the recommended findings of responsibility set forth in the investigative report shall be final. The President shall rely on the recommended findings of responsibility in the investigative report for purposes of imposing sanctions in accordance with Section 10, below.

Voluntary Resolution

Voluntary resolution, when selected by the complainant and deemed appropriate by the President, is a path designed to eliminate the conduct at issue, prevent its recurrence, and remedy its effects in a manner that meets the expressed preference of the complainant and the safety and welfare of the GLBBS community. Voluntary resolution is not appropriate for all forms of conduct under the Policy.

The school retains the discretion to determine, when selected by the complainant, which cases are appropriate for voluntary resolution. If a complainant requests voluntary resolution, and the President concludes that voluntary resolution is appropriate, then the President will take appropriate action by imposing remedies designed to maximize the complainant's access to all employment, educational, and extracurricular opportunities and benefits at the school and to eliminate a potential hostile environment. A complainant may request and decide to pursue voluntary resolution at any time. In those cases in which the voluntary resolution involves either the notification to or participation by the respondent, it is the respondent's decision whether to accept voluntary resolution.

Voluntary resolution may include: conducting targeted or broad-based educational programming or training for relevant individuals or groups; providing increased monitoring, supervision, or security at locations or activities where the misconduct occurred; facilitating a meeting with the respondent with the complainant present (in cases that do not involve sexual assault); and any other remedy that can be tailored to the involved individuals to achieve the goals of the Policy. In some forms of voluntary resolution, the remedies imposed will focus on supporting the complainant with no participation or involvement by the respondent. In other forms of voluntary resolution, the respondent may agree to participate. Depending on the type of remedy used, it may be possible for a complainant to maintain anonymity.

Voluntary resolution may also include restorative principles that are designed to allow a respondent to accept responsibility for misconduct and acknowledge harm to the complainant or to the school community. Restorative models will be used only with the consent of both parties, and following a determination by the President that the matter is appropriate for a restorative approach.

The school will not compel a complainant to engage in mediation, to confront directly the respondent, or to participate in any particular form of informal resolution. Mediation, even if voluntary, is never appropriate in sexual assault cases and will not be used in such cases. As the title implies, participation in voluntary resolution is a choice, and either party can request to end this manner of resolution and pursue an investigation and adjudication at any time, including if voluntary resolution is unsuccessful at resolving the report. Similarly, a complainant can request to end an investigation and pursue voluntary resolution at any time.

The time frame for completion of voluntary resolution may vary, but the school will seek to complete the process within 15 days of the complainant's request.

Grievance/Adjudication Procedures

Hearing Panel

If requested by either complainant or respondent following the distribution of the investigative report, GLBBS will convene a hearing panel. The hearing panel determines whether the respondent is responsible or not responsible for a violation of the Policy. If the respondent is determined to be responsible, the matter proceeds to the sanctions stage.

The hearing panel will generally include the President and one additional member who will be individuals associated with the school. These additional hearing panel members may include administrators, officers, lawyers or other individuals with relevant experience and special training. Panel members may participate remotely so long as the hearing room is equipped with telephone equipment that allows the panel member to hear all the participants and to be heard by all the participants throughout the hearing proceedings. All panelists will receive training from experts in the field at least once a year. In addition to training on how the adjudicatory process works, the training will include specific instruction about how to approach students about sensitive issues that may arise in the context of sexual misconduct. The complainant and respondent will be informed of the panel's membership before the hearing process begins. A complainant and/or respondent may challenge the participation of a panel member because of perceived conflict of interest, bias, or prejudice. Such challenges, including rationale, must be made to the President at least 48 hours prior to the commencement of the hearing. At its discretion, the President will determine whether such a conflict of interest exists and whether a panel member should be replaced.

Postponement of a hearing may occur if a replacement panelist cannot be immediately identified.

Advisors

Both the complainant and the respondent are entitled to be accompanied to any meeting or proceeding relating to the allegation of sexual misconduct by an advisor or support person of their choice, provided the involvement of such advisor or support person does not result in the postponement or delay of such meeting as scheduled.

Written Submissions

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

Hearing Procedures

The President will, whenever possible, give the complainant and respondent at least five days' advance notice of the hearing. The President will arrange to hold the hearing at an off-campus location. The hearing is a closed proceeding, meaning that no one other than the panel members, the complainant and respondent, their respective advisors, witnesses (when called), and necessary school personnel may be present during the proceeding. The President will work with school staff so that any student whose presence is required may participate in the hearing.

In general, hearings will proceed as follows:

The President may set reasonable time limits for any part of the hearing. Each of the complainant and respondent will have the opportunity to present witnesses and other information consistent with the Policy and these Procedures. The panel may determine the relevance of, place restrictions on, or exclude any witnesses or information. When the complainant and respondent are not able to be present for the hearing panel, arrangements will be made for participation via alternate means.

In cases where either the complainant or respondent opts not to participate in the hearing, the panel may still hear from the other.

Additional hearing rules include:

Questioning. Only the panel may ask questions of the complainant and respondent and any witnesses. Both the complainant and respondent will have the opportunity to suggest questions of the other and of witnesses by submitting suggested questions to the panel in writing. The panel may revise or not ask any or all submitted questions.

Information Regarding Romantic or Sexual History. The panel will not consider the romantic or sexual history of either the complainant or respondent in cases involving allegations of sexual misconduct, except for testimony offered by one or the other about the complainant's and respondent's shared sexual history that the panel deems relevant. If such information is offered by the complainant or respondent, the other has the right to respond. The existence of a prior consensual dating or sexual relationship between the complainant and respondent by itself does not support an inference of consent to alleged sexual misconduct.

Prior Conduct Violations. The hearing panel will not consider the respondent's prior conduct violations, unless the investigator provided that information to the hearing panel because the respondent was previously found to be responsible, and the previous incident was substantially similar to the present allegation(s) and/or the information indicates a pattern of behavior by the respondent.

The school will keep an audio recording of the hearing for the use of the panel, for sanctioning, and for purposes of appeal. Cell phones and recording devices may not be used in the hearing room(s) unless approved by the panel in advance.

Panel Determinations/Standard of Proof

The panel will use “preponderance of the evidence” as the standard of proof to determine whether a violation of the Policy occurred. Preponderance of the evidence means that a panel must be convinced based on the information it considers that the respondent was more likely than not to have engaged in the conduct at issue in order to find the respondent responsible for violating the Policy. The panel will find a student responsible, or not responsible, based on a majority vote. The panel will generally render a decision within 10 days after the conclusion of a hearing. The panel’s decision will include an explanation of the basis for the decision. If the panel finds the respondent responsible, the matter will proceed to the sanctions stage.

The parties will be informed of the results of the adjudication hearing by simultaneous written notice to both parties of the outcome of the complaint. As set forth in Section 11, below, both parties shall have the option to appeal the hearing panel’s determination.

Sanctions and Other Remedies

The President, with the advice and counsel of the other hearing panel members, shall be responsible for imposing sanctions that are:

- Fair and appropriate given the facts of the particular case;
- Consistent with the school’s handling of similar cases;
- Adequate to protect the safety of the campus community; and
- Reflective of the seriousness of sexual misconduct.

The President will consider relevant factors, including if applicable: (1) the specific sexual misconduct at issue (such as penetration, touching under clothing, touching over clothing, unauthorized recording, etc.); (2) the circumstances accompanying the lack of consent (such as force, threat, coercion, intentional incapacitation, etc.); (3) the respondent’s state of mind (intentional, knowing, bias-motivated, reckless, negligent, etc.); (4) the impact of the offense on the complainant; (5) the respondent’s prior disciplinary history; (6) the safety of the school community; and (7) the respondent’s conduct during the disciplinary process.

The President will render a sanctioning decision within five days following the receipt of the panel’s determination. The sanctioning decision will be communicated in writing to the complainant and the respondent.

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

- Reprimand/warning
- Changing the respondent’s program
- Disciplinary probation
- Restricting access to school facilities or activities
- Community service
- Issuing a “no contact” order to the respondent or requiring that such an order remain in place
- Dismissal or restriction from school employment
- Suspension (limited time or indefinite)
- Expulsion

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

Whatever the outcome of the hearing process, a complainant may request ongoing or additional accommodations and the President will determine whether such measures are appropriate. Potential ongoing accommodations include:

- Changing the complainant's program
- Allowing the complainant to withdraw from or retake a class without penalty
- Providing access to tutoring or other academic support, such as extra time to complete or re-take a class

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

- Increased monitoring, supervision, or security at locations or activities where the misconduct occurred
- Additional training and educational materials for students and employees
- Revision of the school's policies relating to sexual misconduct
- Climate surveys regarding sexual misconduct

Appeals

Either the respondent or the complainant or both may appeal the determination of the hearing panel and/or the sanctions. Appeals are decided by GLBBS's President.

The three grounds for appeal are:

1. A procedural error affecting the determination or sanction;
2. New information that was not available at the time of the investigation or hearing and that may change the determination or sanction; and
3. Excessiveness or insufficiency of the sanction.

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

The appealing student must submit the appeal in writing to the President within five business days after receiving the sanctioning notice. If either the complainant or respondent submits an appeal, the President will notify the other that an appeal has been filed and the grounds of the appeal. The non-appealing student may submit a written response within five days after notice of an appeal.

If the President concludes that a change in the hearing panel's determination is warranted, the President may enter a revised determination, reconvene the panel to reconsider the determination, or return the matter for additional investigation. After consultation with the President, the President may also change the sanction. If both the complainant and respondent appeal, the appeals will be considered concurrently.

The President will provide simultaneous notification to the complainant and respondent of the final decision in writing. Appeals decisions will be rendered within 10 days after the receipt of the written appeal. All appeal decisions are final.

Records Disclosure

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

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

Additional information about FERPA can be found on the GLBBS's website at www.GLBBS.edu.

Education and Prevention Programs

As set forth in Section 3 of this Policy statement, Sexual Assault, Sexual Harassment, Sexual Exploitation, Dating Violence, Domestic Violence, and Stalking are all forms of Prohibited Conduct.

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

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

The President, hearing panel members, and anyone else who is involved in responding to, investigating, or adjudicating sexual misconduct will receive annual training from experts in the field. In addition to training on how the adjudicatory process works, the training will include specific instruction about how to approach students about sensitive issues that may arise in the context of sexual misconduct.

Bystander Intervention

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

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

Information on Bystander Intervention was provided by the Department of Defense Sexual Assault Prevention and Response Office, www.sapr.mil

Risk Reduction

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

- **Avoiding Dangerous Situations.** While you can never completely protect yourself from sexual assault, there are some things you can do to help reduce your risk of being assaulted.
- **Be aware of your surroundings.** Knowing where you are and who is around you may help you to find a way to get out of a bad situation.
- **Try to avoid isolated areas.** It is more difficult to get help if no one is around.
- **Walk with purpose.** Even if you don't know where you are going, act like you do.
- **Trust your instincts.** If a situation or location feels unsafe or uncomfortable, it probably isn't the best place to be.
- **Try not to load yourself down with packages or bags** as this can make you appear more vulnerable.
- **Make sure your cell phone is with you and charged and that you have cab money.**
- **Don't allow yourself to be isolated with someone you don't trust or someone you don't know.**
- **Avoid putting music headphones in both ears so that you can be more aware of your surroundings, especially if you are walking alone.**

Safety Planning. Things to think about:

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

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

Distract. If you see a friend in a situation that doesn't feel quite right, create a distraction to get your friend to safety. This can be as simple as joining or redirecting the conversation: suggest to your friend that you leave the party, or ask them to walk you home. Try asking questions like: "Do you want to head to the bathroom with me?" or "Do you want to head to another party – or grab pizza?"

Step in. If you see someone who looks uncomfortable or is at risk, step in. If you feel safe, find a way to de-escalate the situation and separate all parties involved. Don't be shy about directly asking the person if they need help or if they feel uncomfortable.

Enlist others. You don't have to go it alone. Call in friends or other people in the area as reinforcements to help defuse a dangerous situation and get the at-risk person home safely. There is safety in numbers.

Keep an eye out. Use your eyes and ears to observe your surroundings. If you see someone who has had too much to drink or could be vulnerable, try to get them to a safe place. Enlist friends to help you. Even if you weren't around when the assault occurred, you can still support a friend in the aftermath.

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

When you go to a social gathering, go with a group of friends. Arrive together, check in with each other throughout the evening, and leave together. Knowing where you are and who is around you may help you to find a way out of a bad situation.

Trust your instincts. If you feel unsafe in any situation, go with your gut. If you see something suspicious, contact law enforcement immediately.

Don't leave your drink unattended while talking, dancing, using the restroom, or making a phone call. If you've left your drink alone, just get a new one.

Don't accept drinks from people you don't know or trust. If you choose to accept a drink, go with the person to the bar to order it, watch it being poured, and carry it yourself. At parties, don't drink from the punch bowls or other large, common open containers.

Watch out for your friends, and vice versa. If a friend seems out of it, is way too intoxicated for the amount of alcohol they've had, or is acting out of character, get him or her to a safe place immediately.

If you suspect you or a friend has been drugged, contact law enforcement immediately. Be explicit with doctors so they can give you the correct tests (you will need a urine test and possibly others).

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

Amendments

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

Definitions of Key Terms

Sexual Harassment - Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when (i) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's education or employment, (ii) submission to or rejection of such conduct by an individual is used as the basis for education or employment decisions affecting such individuals, or (iii) such conduct has the purpose or effect of unreasonably interfering with an individual's school or work performance or creating an intimidating, hostile, or offensive educational or working environment.

Hostile Environment Caused By Sexual Harassment - refers to a situation where students and/or employees are subject to a pattern of exposure to unwanted sexual behavior that is so severe, persistent, or pervasive that it alters the conditions of education, employment, or participation in a school program or activity, thereby creating an environment that a reasonable person in similar circumstances and with similar identities would find hostile, intimidating, or abusive. An isolated incident, unless sufficiently severe, does not amount to a hostile environment caused by sexual harassment.

Quid Pro Quo Harassment – refers to a situation where students and/or employees are subject to unwanted sexual behavior where submission or rejection of such conduct is used, explicitly or implicitly, as the basis for decisions affecting an individual's education, employment, or participation in a school program or activity.

Sexual Assault - An offense that meets the definition of rape, fondling, incest, or statutory rape as used in the FBI's Unified Crime Reporting ("UCR") program.

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

Sex Offenses - Any sexual act directed against another person, without the consent of the victim, including instances where the victim is incapable of giving consent.

Fondling—The touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.

Incest—Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.

Statutory Rape—Sexual intercourse with a person who is under the statutory age of consent.

Domestic Violence - A felony or misdemeanor crime of violence committed (i) by a current or former spouse or intimate partner of the victim; (ii) by a person with whom the victim shares a child in common; (iii) by a person who

is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner; (iv) by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred, or (v) by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred.

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. The existence of such a relationship shall be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. For the purpose of this definition dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse. Dating violence does not include acts covered under the definition of domestic violence.

Prohibited Conduct –GLBBS prohibits the crimes of Sexual Assault, Sexual Harassment, Sexual Exploitation, Dating Violence, Domestic Violence, and Stalking as defined in these Definitions of Key Terms.

Sexual Exploitation - sexual misconduct that occurs when a person takes unjust or abusive sexual advantage of another for his or her own advantage or benefit or for the benefit or advantage of anyone other than the exploited party; and that behavior does not otherwise constitute sexual assault. Examples of sexual exploitation include, but are not limited to, videotaping or photographing of any type (web-cam, camera, Internet exposure, etc.) without knowledge and consent of all persons; prostituting another person; knowingly transmitting HIV or a sexually transmitted disease to an unknowing person or to a person who has not consented to the risk; or inducing incapacitation with the intent to commit sexual assault, without regard to whether sexual activity actually takes place.

Stalking - Engaging in a course of conduct directed at a specific person that would cause a reasonable person to fear for the person's safety or the safety of others or suffer substantial emotional distress. Course of conduct means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property. Substantial emotional distress means significant mental suffering or anguish that may, but does not necessarily, require medical or other professional treatment or counseling. Reasonable person means a reasonable person under similar circumstances and with similar identities to the victim.

Retaliation - means any adverse action, or attempted adverse action, against an individual or group of individuals because of their participation in any manner in an investigation, proceeding, or hearing under this Policy.

Intimidation - To unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack.

Consent is a voluntary agreement to engage in sexual activity.

Past consent does not imply future consent.

Silence or an absence of resistance does not imply consent.

Consent to engage in sexual activity with one person does not imply consent to engage in sexual activity with another.

Consent can be withdrawn at any time.

Coercion, force, or threat of either invalidates consent.

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

Complainant – means the person making the allegation(s) of sexual misconduct.

Respondent – means the person alleged to have committed sexual misconduct.
Definitions of Sexual Misconduct under Washington Law

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

RCW 9A.44.010 - Definitions.

As used in this chapter:

"Sexual intercourse" (a) has its ordinary meaning and occurs upon any penetration, however slight, and

Also means any penetration of the vagina or anus however slight, by an object, when committed on one person by another, whether such persons are of the same or opposite sex, except when such penetration is accomplished for medically recognized treatment or diagnostic purposes, and

Also means any act of sexual contact between persons involving the sex organs of one person and the mouth or anus of another whether such persons are of the same or opposite sex.

"Sexual contact" means any touching of the sexual or other intimate parts of a person done for the purpose of gratifying sexual desire of either party or a third party.

* * *

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

"Consent" means that at the time of the act of sexual intercourse or sexual contact there are

actual words or conduct indicating freely given agreement to have sexual intercourse or sexual contact.

* * *

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

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

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

Kidnaps the victim; or

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

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

RCW 9A.44.050 - Rape in the second degree.

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

By forcible compulsion;

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

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

Has supervisory authority over the victim; or

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

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

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

Where the victim did not consent as defined in RCW 9A.44.010(7), to sexual intercourse with the perpetrator and such lack of consent was clearly expressed by the victim's words or conduct, or

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

RCW 9A.44.100 - Indecent liberties.

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

By forcible compulsion;

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

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

Has supervisory authority over the victim; or

Was providing transportation, within the course of his or her employment, to the victim at the time of the offense; When the perpetrator is a health care provider, the victim is a client or patient, and the sexual contact occurs during a treatment session, consultation, interview, or examination.

The Revised Code of Washington defines Stalking as follows:

RCW 9A.46.110 - Stalking.

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

He or she intentionally and repeatedly harasses or repeatedly follows another person; and

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

The stalker either:

Intends to frighten, intimidate, or harass the person; or

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

* * *

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

* * *

(6) As used in this section:

* * *

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

* * *

"Repeatedly" means on two or more separate occasions.

RCW 9.61.260 - Cyberstalking.

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

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

Anonymously or repeatedly whether or not conversation occurs; or

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

* * *

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

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

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

RCW 26.50.010 - Definitions.

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

* * *

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

"Domestic violence" means: (a) Physical harm, bodily injury, assault, or the infliction of fear of imminent physical harm, bodily injury or assault, between family or household members; (b) sexual assault of one family or household member by another; or (c) stalking as defined in RCW 9A.46.110 of one family or household member by another family or household member.

* * *

(6) "Family or household members" means spouses, domestic partners, former spouses, former domestic partners, persons who have a child in common regardless of whether they have been married or have lived together at any time, adult persons related by blood or marriage, adult persons who are presently residing together or who have resided together in the past, persons sixteen years of age or older who are presently residing together or who have resided together in the past and who have or have had a dating relationship, persons sixteen years of age or older with whom a person sixteen years of age or older has or has had a dating relationship, and persons who have a biological or legal parent- child relationship, including stepparents and stepchildren and grandparents and grandchildren.

Registered Sex Offenders

Information about registered sex offenders in Mackinac County can be obtained by contacting the Mackinac County Sheriff's office at (906) 643-1911. https://www.michigan.gov/msp/0,4643,7-123-1878_24961---,00.html. Information about registered sex offenders in Michigan can be obtained from the Michigan Sex Offender Registry website at https://www.michigan.gov/msp/0,4643,7-123-1878_24961---,00.html.

Crime Statistics

GLBBS discloses campus crime statistics gathered from CSAs and local law enforcement officials. The statistics are broken down geographically into on campus, non-campus, or public property such as streets and sidewalks adjacent to the school. The report also indicates if any of the reported incidents, or any other crime involving bodily injury, was a hate crime. See Appendix B: 2017– 2019 Campus Crime Statistics.

In some cases an incident that is reported as a crime may not be included in the Annual Security Report. All of the following standards must be met for an incident to be included in the annual report.

Reported to the Proper Authorities: Incidents must be reported to law enforcement or a Campus Security Authority (CSA).

Listed Crimes: The crime must be one of those listed in the Clery Act as a reportable crime. (See list below.)

Reportable Area: The crime must have occurred in one of the reportable areas.

On Campus: Building/Property that is owned/operated by the institution or school, including any paths necessary to travel to get to building/property.

Non-Campus: Building/Property that is owned/controlled by the institute, but not within the same contiguous geographical region (i.e., on campus).

Public Property: Thoroughfares, streets, sidewalks and city-owned parking facilities within the campus or immediately adjacent to/and accessible from the campus.

See Appendix C: GLBBS Campus Map.

Made in Good Faith: For an incident to be included there must be a determination that the report is made in good faith. Supporting evidence makes this determination easy, but such evidence is not always available. In such a case the creditability of the person making the report is considered. When the incident is reported to us through a law enforcement agency, we assume that this determination has already been made.

Note: If law enforcement determines that a particular reported incident could not have occurred or did not occur, i.e., a false report, the crime is not included in the Annual Security Report. Only law enforcement can rule a case “unfounded.”

Crimes are reported in the following seven major categories, with significant sub-categories and conditions:

- Criminal Homicide
- Murder and Non-negligent Manslaughter
- Manslaughter by Negligence
- Sexual Assault (Sex Offenses)
- Rape
- Fondling
- Incest
- Statutory Rape
- Robbery
- Aggravated Assault
- Burglary, where:
 - There is evidence of unlawful entry (trespass), which may be either forcible or not involve force.
 - Unlawful entry must be of a structure - having four walls, a roof, and a door.
 - There is evidence that the entry was made in order to commit a felony or theft.
 - Motor Vehicle Theft
 - Arson

Schools are also required to report statistics for the following categories of arrests or referrals for campus disciplinary action (if an arrest was not made):

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

Schools are also required to report statistics for crimes added to the Clery Act by the Violence Against Women Act:

- Domestic Violence
- Dating Violence
- Stalking

Hate crimes must be reported by category of prejudice, including race, gender, gender identity, religion, sexual orientation, ethnicity, national origin, and disability. Statistics are also required for the additional crime categories if the crime committed is classified as a hate crime:

- Larceny/theft
- Simple assault

- Intimidation
- Destruction/damage/vandalism of property

Appendices

Appendix A – Clery Act Crime Definitions

Note: Please see the Definitions of Key Terms under the GLBBS's Sexual Misconduct Policy & Procedures for the Clery Act Crime Definitions regarding conduct that falls within the scope of that policy.

AGGRAVATED ASSAULT: An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm.

ARSON: Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property of another, etc.

BURGLARY: The unlawful entry of a structure to commit a felony or a theft. For reporting purposes this definition includes: Unlawful entry with intent to commit a larceny or a felony; breaking or entering with intent to commit a larceny; housebreaking; safecracking; and all attempts to commit any of the aforementioned.

DESTRUCTION / DAMAGE / VANDALISM OF PROPERTY: To willfully or maliciously destroy, damage, deface, or otherwise injure real or personal property without the consent of the owner or the person having custody or control of it.

DRUG LAW VIOLATIONS: The violation of laws prohibiting the production, distribution, and/or use of controlled substances and the equipment or devices utilized in their preparation and/or use. The unlawful cultivation, manufacture, distribution, sale, purchase, use, possession, transportation or importation of any controlled drug or narcotic substance. Arrest for violations of state and local laws, specifically those relating to the unlawful possession, sale, use, growing, manufacturing, and making of narcotic drugs.

HATE CRIMES: A criminal offense committed against a person, property, or society which is motivated, in whole or in part, by the offender's bias against a gender, gender identity, race, religion, disability, sexual orientation, ethnicity, or national origin; also known as a bias crime.

WEAPONS - CARRYING, POSSESSING, ETC. VIOLATIONS: The violation of laws or ordinances prohibiting the manufacture, sale, purchase, transportation, possession, concealment, or use of firearms, cutting instruments, explosives, incendiary devices or other deadly weapons. Include possession of deadly weapons; carrying deadly weapons, concealed or open; using, manufacturing, etc., of silencers; furnishing deadly weapons to minors; aliens possessing deadly weapons; and attempts to commit any of the above.

INTIMIDATION: To unlawfully place another person in reasonable fear of bodily harm through the use of threatening words and/or other conduct, but without displaying a weapon or subjecting the victim to actual physical attack.

LARCENY-THEFT: 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.

LIQUOR LAW VIOLATIONS: The violation of state or local laws or ordinances prohibiting the manufacture, sale, purchase, furnishing, transportation, possession, or use of alcoholic beverages or intoxicating liquor; maintaining unlawful drinking places; bootlegging; operating a still; furnishing liquor to a minor or intemperate person; underage possession; using a vehicle for transportation of liquor; drinking on a train or public conveyance; and all attempts to commit any of the above. Not including driving under the influence and drunkenness.

MOTOR VEHICLE THEFT: The theft or attempted theft of a motor vehicle (SUV's, automobiles, trucks, buses, motorcycles, motor scooters, golf carts, motorized wheelchairs, ATV's, and snowmobiles).

MURDER/NON-NEGLIGENT MANSLAUGHTER: The willful (non-negligent) killing of one human being by another.
MANSLAUGHTER BY NEGLIGENCE: The killing of another person through gross negligence.

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.

SIMPLE ASSAULT: An unlawful physical attack by one person upon another where neither the offender displays a weapon, nor the victim suffers obvious severe or aggravated bodily injury involving apparent broken bones, loss of teeth, possible internal injury, severe laceration, or loss of consciousness.

Appendix B – Campus Crime Statistics 2017-2019

Offense	On Campus			Non Campus			Public Property		
	2017	2018	2019	2017	2018	2019	2017	2018	2019
Murder/Non-Negligent Manslaughter	0	0	0	0	0	0	0	0	0
Manslaughter by Negligence	0	0	0	0	0	0	0	0	0
Rape	0	0	0	0	0	0	0	0	0
Fondling	0	0	0	0	0	0	0	0	0
Incest	0	0	0	0	0	0	0	0	0
Statutory Rape	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0
Aggravated Assault	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	0	0	0
Motor Vehicle Theft	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0
VAWA Offenses									
Domestic Violence	0	0	0	0	0	0	0	0	0
Dating Violence	0	0	0	0	0	0	0	0	0
Stalking	0	0	0	0	0	0	0	0	0
Arrests & Disciplinary Referrals									
Liquor Law Arrests	0	0	0	0	0	0	0	0	0
Liquor Law Violations Referred for Disciplinary Action	0	0	0	0	0	0	0	0	0
Drug Law Arrests	0	0	0	0	0	0	0	0	0
Drug Law Violations Referred for Disciplinary Action	0	0	0	0	0	0	0	0	0
Weapons: Carrying, Possessing, Etc. Arrests	0	0	0	0	0	0	0	0	0
Weapons: Carrying, Possessing, Etc. Violations Referred for Disciplinary Action	0	0	0	0	0	0	0	0	0

No hate crimes

Appendix C – Campus Map



ON CAMPUS: Includes the areas within the property boundaries shown in the map above:

GLBBS Administration and Shop building

Taylor House

Dock

Future Breezeswept Building

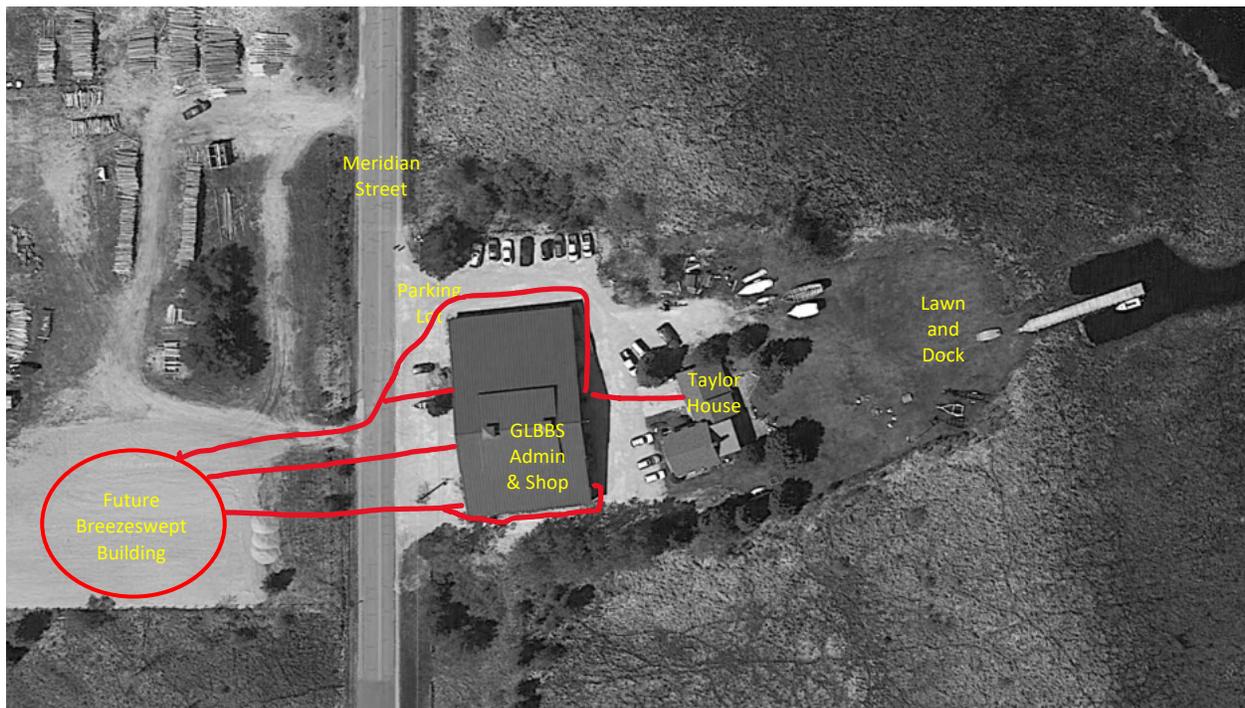
Parking Lot

PUBLIC PROPERTY:

Future Breezeswept Docking Building

Includes Meridian Street in front of the GLBBS Administration and Shop buildings

Appendix D – Evacuation Procedures



Evacuation

In the event of evacuation all students and staff will congregate at the Future Breezeswept Building, shown above with a red circle. The President will contact all instructors by cell phone and each Instructor will be responsible for getting their students to the congregation area, then confirming with the President. Similarly, the President will contact all administrative staff and ensure that all are accounted for. Every building has multiple exit doors (marked in red) that people will use to leave the buildings.

Appendix E -- Emergency Action Plan

The local government (Clark Township) requires a fire and safety inspection prior to receiving a Certificate of Occupancy (OF07-0025, received 8/14/2007).

Fire Drill- Fire Drills are performed annually.

In Case of Fire

1. Immediately pull the nearest fire alarm pull station as you exit the building.
2. When evacuating the building, be sure to feel doors for heat before opening them to be sure there is no fire danger on the other side.
3. If there is smoke in the air, stay low to the ground, especially your head, to reduce inhalation exposure. Keep on hand on the wall to prevent disorientation and crawl to the nearest exit.
4. Once away and clear from danger, meet other students and staff at Future Breezeswept building await further instructions from emergency personnel.

Who to Contact in Case of a Fire

In order to ensure that the proper authorities are notified of a fire, when the opportunity arises once you are safe from imminent danger, call any of the following:

Emergency Notification System	911
Clark Township Fire Department	(906) 484-2883
Mackinac County Sheriff's Department	(906) 643-1911

Fire Safety Precautions and Fire Systems Equipment

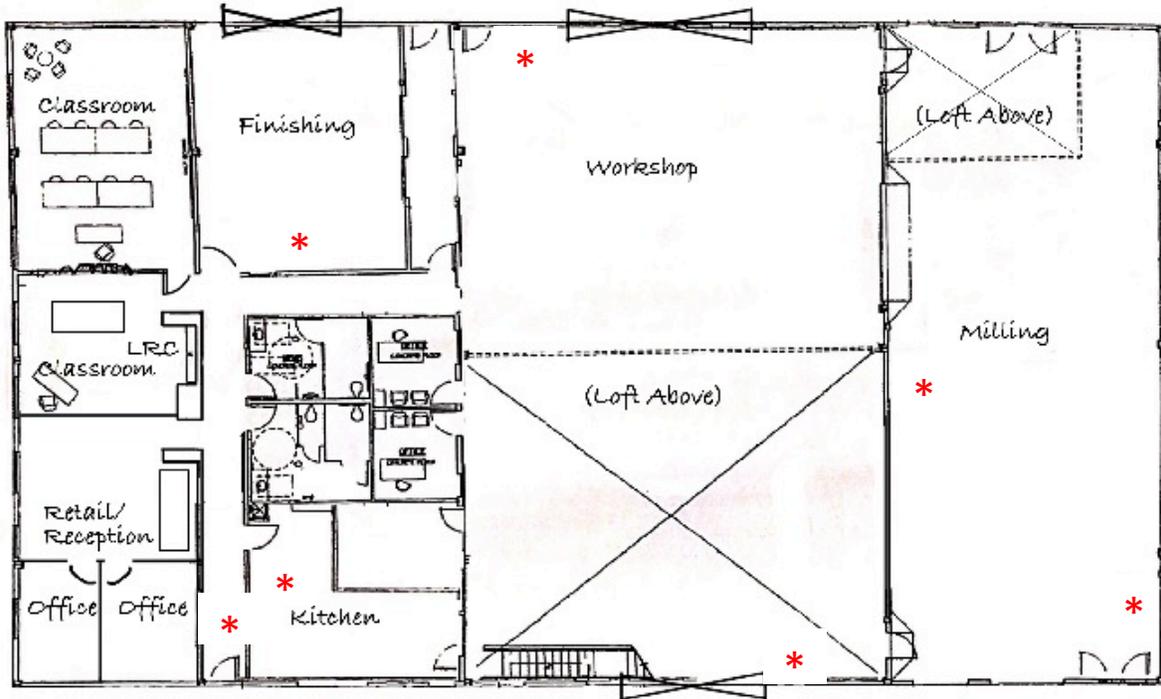
- Keep doorways, corridors and egress paths clear and unobstructed. Make sure that all electrical appliances and cords are in good condition and UL approved. Do not overload electrical outlets. Use surge protected multi-outlet power strips and extension cords when necessary.
- Do not tamper with any fire system equipment such as smoke detectors, pull stations or fire extinguishers. Doing so is a criminal offense.
- Raising a false alarm is a criminal offense. It endangers the lives of the occupants and emergency personnel.

Fire Safety Do's & Don't's

- DO treat every fire alarm as an emergency. If the alarm sounds, exit the building immediately.
- DO close the doors behind you.
- DO become aware of other students and staff- note if they have not evacuated and tell authorities they are missing and may need assistance.

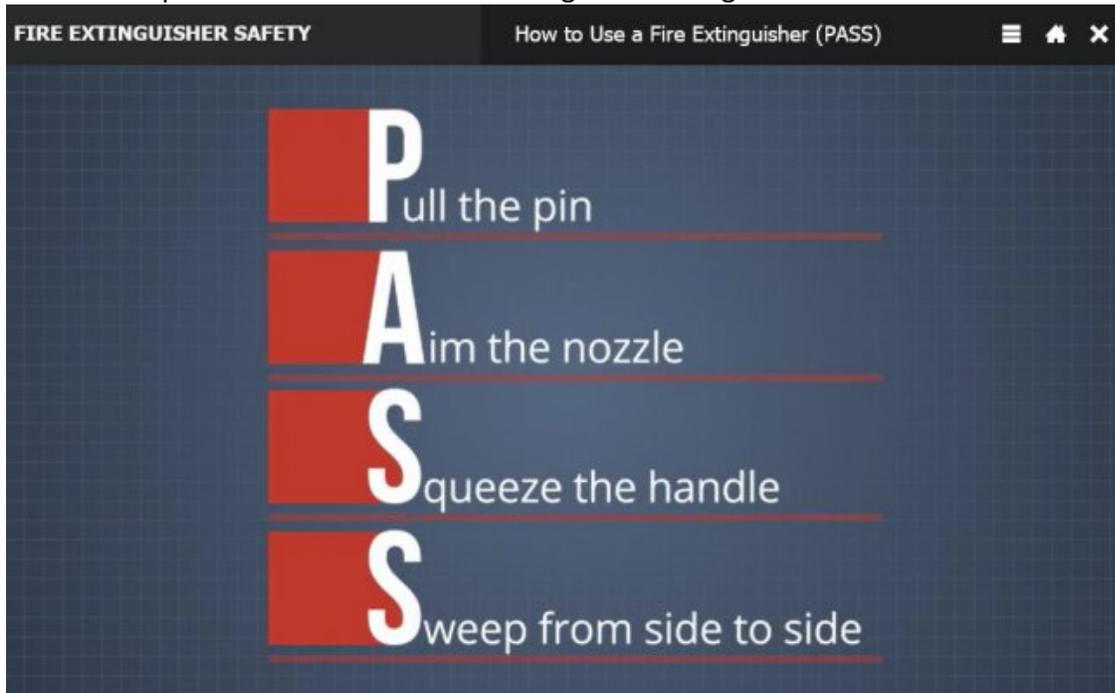
- DON'T assume that a fire alarm is a test. Any alarm could be the result of a dangerous fire.
- DON'T waste time collecting personal items. Take your keys and yourself to safety as soon as possible.
- Don't shut millroom doors. Clark Township Fire Department has recommended Millroom doors are to remain open.

Fire Extinguisher Locations- RED Asterick *



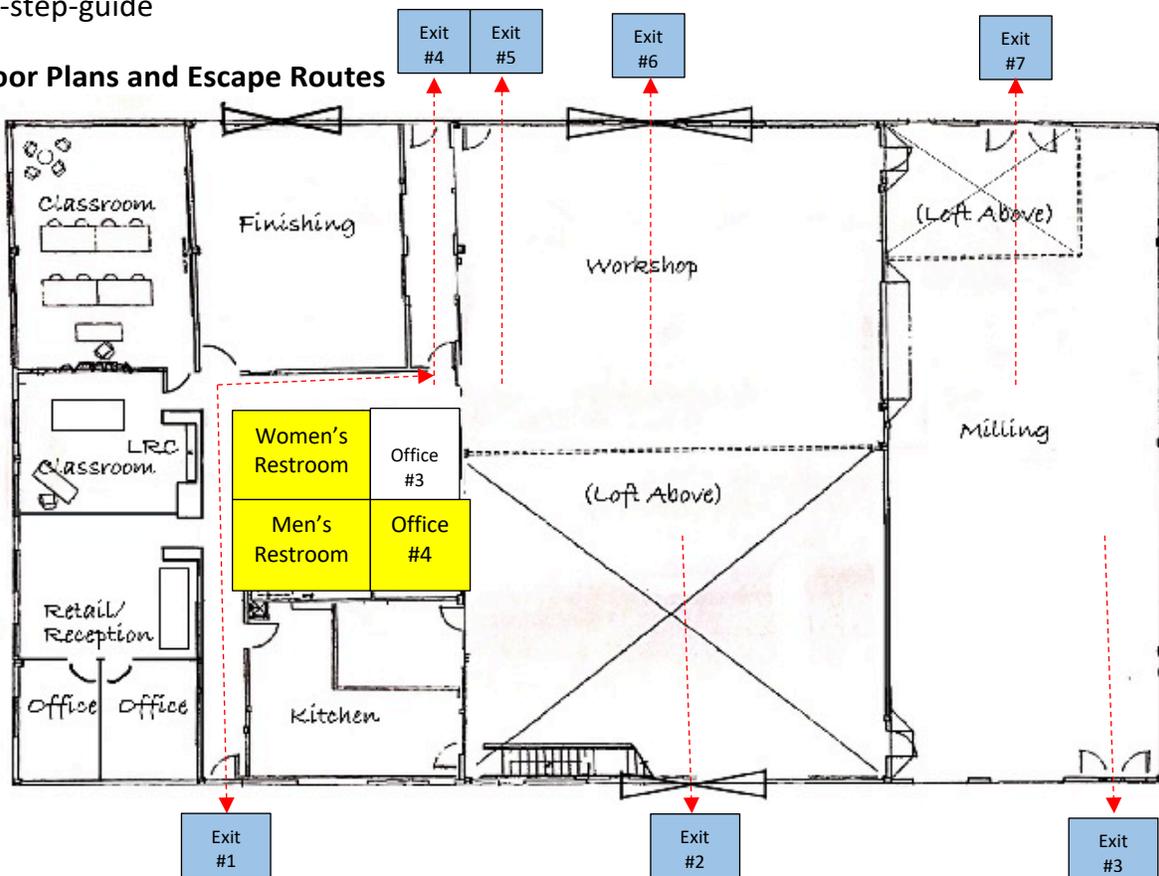
Fire Extinguisher Operations

The four steps of the PASS method for using a fire extinguisher below.



Detailed: <https://www.convergencetraining.com/blog/how-to-use-a-fire-extinguisher-step-by-step-guide>

Floor Plans and Escape Routes



Fire

In the event of a fire, the School has 7 potential exits (Marked with red dotted arrow lines). Once students, staff and visitors exit the building, they should gather across the street at the Future Breezeswept Building. The Registrar will take a head count of all people present. Once employees, guests and students have been accounted for they will remain in the area until directed by emergency responders.

Tornado

In the event of a Tornado warning being issued locally all GLBBS employees, visitors and students are to gather in the women's and men's restrooms and office #3 located in the center of the building displayed in yellow. Once all employees, guests and students have been accounted for they will remain in the area until directed by the President.