



Annual Campus Security Report 2020



L'ESPRIT ACADEMY POLICY ON A DRUG-FREE WORKPLACE/SCHOOL

L'esprit Academy is committed to protecting the safety, health and well-being of all employees and other individuals in our workplace. We recognize that alcohol abuse and drug use pose a significant threat to our goals. We have established a drug-free workplace and Drug and Alcohol Abuse Prevention Program (DAAPP) that balances our respect for individuals

with the need to maintain an alcohol and drug-free environment. This organization encourages employees and students to voluntarily seek help with drug and alcohol problems.

We at L'esprit Academy have made a commitment to create highly skilled graduates in a well-supported student environment. L'esprit Academy has an obligation to prohibit and/or eliminate illegal drug use from the school. We honor this obligation in the following manner:

1. Imposing an absolute prohibition on the unlawful distribution, dispensation, possession, or use of a controlled substance or alcohol by any student or employee of L'esprit Academy on school property or as a part of any school activity.
2. Making available to all students and employees information concerning the health hazards involved with alcohol and drug abuse.
3. Making available to all students and employees information concerning the legal sanctions involved with the illegal use of drugs and alcohol.
4. Making available to all students and employees information concerning drug and alcohol counseling and rehabilitation services.

ON-CAMPUS PROHIBITION OF DRUGS OR ACHOHOL

Covered Workers

Any individual who conducts business for the organization, is applying for a position or is conducting business on the organization's property is covered by our drug-free workplace policy, including students. Our policy includes, but is not limited to CEO, executive management, managers, supervisors, full-time employees and part-time employees.

Applicability

Our drug-free workplace policy is intended to apply whenever anyone is representing or conducting business for the organization. Therefore, this policy applies during all working hours.

Prohibited Behavior

It is a violation of our drug-free workplace policy to use, possess, sell, trade, and/or offer for sale alcohol, illegal drugs or intoxicants.

Notification of Convictions

Any employee who is convicted of a criminal drug violation in the workplace must notify the organization in writing within five calendar days of the conviction. The organization will take appropriate action within 30 days of notification. Federal contracting agencies will be notified when appropriate.

Searches

Entering the organization's property constitutes consent to searches and inspections. If an individual is suspected of violating the drug-free workplace policy, he or she may be asked to submit to a search or inspection at any time. Searches can be conducted of pockets and clothing, lockers, wallets, purses, briefcases and lunchboxes, desks, work stations, vehicles and equipment.

Drug Testing

To ensure the accuracy and fairness of our testing program, all testing will be conducted according to Substance Abuse and Mental Health Services Administration (SAMHSA) guidelines where applicable and will include a screening test; a confirmation test; the opportunity for a split sample; review by a Medical Review Officer, including the opportunity for

employees who test positive to provide a legitimate medical explanation, such as a physician's prescription, for the positive result; and a documented chain of custody. All drug-testing information will be maintained in separate confidential records. Each employee, as a condition of employment, will be required to participate in reasonable suspicion and follow-up testing upon selection or request of management. The substances that will be tested for are: Amphetamines, Cannabinoids (THC), Cocaine, Opiates, Phencyclidine (PCP), Alcohol, Barbiturates, Benzodiazepines, Methaqualone, Methadone and Propoxyphene. Testing for the presence of alcohol will be conducted by analysis of breath. Testing for the presence of the metabolites of drugs will be conducted by the analysis of urine. Any employee who tests positive will be immediately removed from duty and referred to a substance abuse professional for assessment and recommendations. An employee will be subject to the same consequences of a positive test if he/she adulterates or dilutes the specimen, substitutes the specimen with that from another person or sends an imposter or refuses to cooperate in the testing process in such a way that prevents completion of the test.

Consequences

One of the goals of our drug-free workplace program is to encourage employees to voluntarily seek help with alcohol and/or drug problems. If, however, an individual violates the policy, the consequences are serious. In the case of applicants, if he or she violates the drug-free workplace policy, the offer of employment can be withdrawn. The applicant may reapply after six months and must successfully pass a pre-employment drug test. If an employee violates the policy, he or she will be subject to progressive disciplinary action and may be required to enter rehabilitation. An employee required to enter rehabilitation who fails to successfully complete it and/or repeatedly violates the policy will be terminated from employment. Nothing in this policy prohibits the employee from being disciplined or discharged for other violations and/or performance problems.

Return-to-Work Agreements

Following a violation of the drug-free workplace policy, an employee may be offered an opportunity to participate in rehabilitation. In such cases, the employee must sign and abide by the terms set forth in a Return-to-Work Agreement as a condition of continued employment.

Assistance

L'esprit Academy recognizes that alcohol abuse, drug abuse and addiction are treatable illnesses. We also realize that early intervention and support improve the success of rehabilitation. To support our employees, our drug-free workplace policy: Encourages employees to utilize the services of qualified professionals in the community to assess the seriousness of suspected drug or alcohol problems and identify appropriate sources of help. Treatment for alcoholism and/or other drug use disorders may be covered by the employee benefit plan. However, the ultimate financial responsibility for recommended treatment belongs to the employee.

Confidentiality

All information received by the organization through the drug-free workplace program is confidential communication. Access to this information is limited to those who have a legitimate need to know in compliance with relevant laws and management policies.

Shared Responsibility

A safe and productive drug-free workplace is achieved through cooperation and shared responsibility. Both employees and management have important roles to play. All employees are required to not report to work or be subject to duty while their ability to perform job duties is impaired due to on-duty or off-duty use of alcohol or other drugs.

In addition, employees are encouraged to:

- Support fellow workers in seeking help.
- Report dangerous behavior to their supervisor.

It is the supervisor's responsibility to:

- Observe employee performance.
- Document negative changes and problems in performance.

Communication

Communicating our drug-free workplace policy to both supervisors and employees is critical to our success. To ensure all employees are aware of their role in supporting our drug-free workplace program:

The policy will be reviewed in orientation sessions with new employees.

- Employees
- As a condition of employment, employees will notify the school of any criminal drug statute conviction for a violation occurring in the workplace no later than five days after such conviction.

Within 30 days of the employee notification of the first such conviction, the school will either terminate the employee or require written documentation from the employee that he/she has entered a rehabilitation program. A second conviction will result in termination.

Students

The unlawful manufacture, distribution, dispensation, possession or use of a controlled substance or abuse of alcohol by anyone on L'esprit Academy property or as a part of any L'esprit Academy activity is prohibited. Students taking prescribed or over-the-counter medication which may affect functioning should so inform Campus Security Authorities. If a final determination is made that any student of L'esprit Academy is found to be abusing alcohol or using, possessing, manufacturing or distributing controlled substances in violation of the law on L'esprit Academy property or at L'esprit Academy events, they shall be subject to, at a minimum, the referral to counseling and automatic and immediate suspension or dismissal from School. L'esprit Academy imposed sanctions are additional to any legal actions taken by local, state or federal authorities.

DISSEMINATION OF INFORMATION

Employees

The school will distribute to all employees at least annually:

1. This policy statement.
2. Information concerning health hazards of substance abuse.
3. Information concerning legal sanctions involved with the illegal use of alcohol and other drugs.
4. Information concerning drug counseling or rehabilitation.
5. Information concerning sex offenses and offenders.

Students

1. Items 1-5 in the employee dissemination section above will be provided to students at time of registration.
2. The student catalog will continue to contain a statement indicating that the unlawful possession or use of alcohol on school property is grounds for dismissal.

EFFECTIVENESS OF THIS POLICY *

Management of the school will monitor the effectiveness of this policy on a biennial basis (in the months prior to October filing of Annual Safety Report) and make any necessary modification at that time. L'esprit Academy will conduct a biennial review of the DAAPP and prepare a report of findings. This review is done by the Compliance Committee and final review is by

the CEO.

To determine if the DAAPP is meeting effective, L'esprit will assess:

1. Each campus and the number of violations of the conduct code with regards to Drugs & Alcohol occurred during the prior two years.
2. Each campus determining the number of students whose DAAPP violations resulted in terminations from the school.
3. Each campus, and if there are two or less individuals who had violations during the period, and one or less individual who was terminated due to a violation, then L'esprit determines there is not a drug and/or alcohol issue at the campus. If not, then the campus has a potential drug/alcohol issue at the campus.
4. The follow-up action plan required depending on the number of campuses with a potential drug/alcohol issue:
 - a. If neither campus has a potential drug/alcohol issue, then the school's DAAPP is deemed effective.
 - b. If one campus has a potential drug/alcohol issue, then school's DAAPP is deemed effective, but the campus General Manager or Campus Safety Officer, will develop a report to explain the local conditions and determine if there are local changes required.
 - c. If both L'esprit campuses have a potential drug/alcohol issue, then there may be a systemic issue with the effectiveness of school's DAAPP. In this case, the school will seek a reassessment of policy from the Compliance Committee and Advisory Board.
 - d. The report must include potential causes of the problem, recommendations of corrections, and a summary of policy adjustments to reduce or eliminate violations.

****Per the biennial review of this policy in September 2020 it was determined the policy is effective due to neither campus having a drug or alcohol related conduct code violation in the past two years.***

FACTS ABOUT DRUGS AND ALCOHOL

ALCOHOL AND DRUG PREVENTION POLICY

L'esprit Academy in its policies supports and endorses the Federal Drug-Free Workplace Act of 1988. The unlawful manufacture, distribution, dispensation, possession or use of a controlled substance or abuse of alcohol by anyone on L'esprit Academy property or as a part of any L'esprit Academy activity is prohibited. Students taking prescribed or over-the-counter medication which may affect functioning should so inform Campus Security Authorities and/or management. A good resource for information and help can be found online at <http://www.drugabuse.gov/>. The health risks associated with the use of illicit drugs and the abuse of alcohol are:

ALCOHOL

Alcohol may provide a feeling of confidence and being in control. Those likely to be addicted may have an enzyme deficiency that allows them a high rate of consumption without drunkenness, encouraging a belief that since one doesn't get obviously drunk, no harm is done. The tolerance is only on the surface. Liver, brain, heart, and stomach destruction goes on even without apparent symptoms. Over time, beer, wine, and wine coolers, as well as hard alcohol, often cause dependency and may be fatal.

MARIJUANA

Use of marijuana may impair or reduce short-term memory and comprehension, alter sense of time, and reduce ability to perform tasks requiring concentration and coordination, such as driving a car. Research shows that knowledge retention may be lower when information is given while the person is "high." Motivation and cognition are altered, making the

acquisition of new information difficult. Marijuana can also produce paranoia and psychosis. The tar in marijuana smoke is a highly irritating carcinogenic. Long-term use may develop psychological dependence. Marijuana use before coming to school or during the school day is prohibited regardless of State law or medical use cards since it is federally prohibited.

COCAINE

Chronic use can cause ulceration of the mucous membrane in the nose. Cocaine can produce psychological dependency, a feeling that the user cannot function without the drug. Crack or free-base rock, a concentrated form of cocaine, is extremely potent. Its effects are felt within ten seconds of administration. Physical effects include dilated pupils, increased pulse rate, elevated blood pressure, and insomnia, loss of appetite, tactile hallucinations, paranoia, and seizures. Cocaine use may lead to death through disruption of the brain's control of the heart and respiration.

AMPHETAMINES AND OTHER STIMULANTS

Stimulants can cause increased heart and respiratory rates, elevated blood pressure, dilated pupils, and decreased appetite. In addition, users may perspire, experience headache, blurred vision, dizziness, sleeplessness, and anxiety. Extremely high doses can cause rapid or irregular heartbeat, tremors, loss of coordination, and even physical collapse. An amphetamine injection creates a sudden increase in blood pressure that can result in stroke, very high fever, or heart failure. In addition to the physical effects, users report feeling restless, anxious, and moody. Higher doses intensify the effects. Persons who use large amounts of amphetamines over a long period of time can develop an amphetamine psychosis that includes hallucination, delusions, and paranoia.

NARCOTICS (INCLUDING: HEROIN, METHADONE, MORPHINE, OPIUM, AND CODEINE)

Tolerance to narcotics develops rapidly and dependence is likely. The use of unsterilized syringes may result in transmission of diseases such as AIDS, endocarditis, and hepatitis. Addiction in pregnant women can lead to premature, stillborn, or addicted infants. An overdose may produce slow and shallow breathing, clammy skin, convulsions, coma, and death.

DEPRESSANTS

The use of depressants can cause both physical and psychological dependence. Regular use over time may result in tolerance to the drug, leading the user to increase the quantity consumed. Very large doses can cause respiratory depression, coma, and death. The combination of depressants and alcohol can increase the effects of the drugs, thereby multiplying the risks. When regular users stop taking depressant drugs, they may develop withdrawal symptoms ranging from restlessness, insomnia, and anxiety to convulsions and death. Babies born to mothers who abuse depressants during pregnancy may be physically dependent on the drugs and show withdrawal symptoms shortly after they are born. Birth defects and behavioral problems have been associated with these children.

HALLUCINOGENS

Chronic users of PCP report persistent memory problems and speech difficulties. Mood disorders (depression, anxiety, and violent behavior) also occur. In later stages, chronic users often exhibit paranoid and violent behavior and experience hallucinations. Large doses of PCP may produce convulsions, coma, heart and lung failure, or ruptured blood vessels in the brain. Lysergic acid (LSD), mescaline, and psilocybin cause illusions and hallucinations. The physical effects may include dizziness, weakness, tremor, nausea, and drowsiness. Sensations and feelings may change rapidly. It is common to have a bad psychological reaction to LSD, mescaline, and psilocybin. The user may experience panic, confusion, suspicion, anxiety, and loss of control. Delayed effects, or flashbacks, can occur even after the use has ceased.

DESIGNER DRUGS

Underground chemists modify the molecular structure of certain illegal drugs to produce analogs known as designer drugs. These drugs can be hundreds of times stronger than the drugs that they are designed to imitate. The narcotic

analogues can cause symptoms such as those seen in Parkinson's disease; uncontrollable tremors, drooling, impaired speech, paralysis, and irreversible brain damage. Analogues of amphetamines and methamphetamines cause nausea, blurred vision, chills or perspiration, and faintness. Psychological effects include anxiety, depression, and paranoia. As little as one dose can cause brain damage. The analogues of phencyclidine cause illusions, hallucinations, and impaired perception.

FEDERAL STUDENT FINANCIAL AID PENALTIES FOR DRUG LAW VIOLATIONS

Federal law provides that a student who has been convicted of an offense under any federal or state law involving the possession or sale of a controlled substance during a period of enrollment for which the student was receiving financial aid shall not be eligible to receive any federal or institutional grant, loan, or work assistance during the period beginning on the date of such conviction and ending after the interval specified in the following table.

If convicted of an offense involving:

Possession of a Controlled Substance	Ineligibility Period
First Offense	1 year
Second Offense	2 years
Third Offense	Indefinite
Sale of a Controlled Substance	Ineligibility Period
First Offense	2 years
Second Offense	Indefinite

A student whose eligibility has been suspended based on a conviction for possession or sale of a controlled substance may resume eligibility before the end of the ineligibility period if the student satisfactorily completes a drug rehabilitation program that:

- complies with the criteria prescribed in the federal regulations; and
- includes two unannounced drug tests;
- the student successfully passes two unannounced drug tests conducted by a drug rehabilitation program that complies with the criteria prescribed in the federal regulations; or
- the conviction is reversed, set aside, or otherwise rendered nugatory.

LEGAL SANCTIONS

A full description of federal drug penalties can be found at: <http://www.usdoj.gov/dea/agency/penalties.htm>

ANTI-BULLYING AND HARASSMENT POLICY

L'esprit Academy models the Michigan State Board of Education Anti-Bullying policy. We consider bullying or harassment as a gesture, written, verbal, graphic or physical act (including electronically transmitted acts) that is reasonably perceived as being motivated either by an actual or perceived characteristic, such as race, color, religion, ancestry, gender, sexual orientation, gender identity or expression, or disability which interferes with educational opportunities or adversely affects

the student's ability to participate in school or associated events. As stated in our policy on Academy Decorum, the school expects everyone to demonstrate positive behavior. Alleged bullying should be brought to the immediate attention of Academy staff. Appropriate measures will be taken to ensure a safe, creative environment for everyone in the school and disciplinary action will result if required. Discipline for breaches in policy by students is not considered harassment by the school; however, an enforcement of the agreement entered into by all who attend the Academy.

SEXUAL MISCONDUCT PREVENTION AND RESPONSE POLICY

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

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

As part of the School's commitment to providing a harassment-free working and learning environment, this policy shall be disseminated 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 harassment or sexual violence promptly and effectively. The School will respond quickly to all reports, and will take appropriate action to prevent, to correct, and if necessary, to discipline behavior that violates this policy.

Definitions

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

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

Domestic Violence is defined as abuse committed against an adult or a minor who is a spouse or former spouse, cohabitant or former cohabitant, or someone with whom the abuser has a child, has an existing dating or engagement relationship, or has had a former dating or engagement relationship.

Dating Violence is defined as abuse committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim.

Sexual Assault occurs when a physical sexual activity is engaged in without the consent of the other person or when the other person is unable to consent to the activity. The activity or conduct may include physical force, violence, threat, or intimidation, ignoring the objections of the other person, causing the other person's intoxication or incapacitation through the use of drugs or alcohol, and taking advantage of the other person's incapacitation (including voluntary intoxication).

Stalking is behavior in which a person repeatedly engages in conduct directed at a specific person that places that person in reasonable fear of his or her safety or the safety of others.

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

Prohibited Conduct

This policy strictly prohibits sexual or other unlawful harassment or discrimination as well as sexual violence, as defined above including dating violence, domestic violence, sexual assault and stalking. Sexual or other unlawful harassment or discrimination includes any verbal, physical or visual conduct based on race, age, religion, sexual orientation, national origin, ethnicity, gender, gender identity, disability or any other legally protected basis if:

- 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 a basis for decisions concerning that individual's education or employment; or
- iii. it creates a hostile or offensive work environment, which means the alleged conduct is sufficiently serious to limit or deny a student's or ability to participate or benefit from the student's education program.

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

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

Complaint/Grievance Procedure

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

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

Title IX Coordinator(s):

Title IX Coordinator Lori Groat, Academy Director

**Canton Campus: (new location as of April 2018)
42011 & 42083 Ford Rd., Canton, MI 48187**

**Royal Oak Campus:
501 S. Washington Ave., Royal Oak MI 48067**

**All campuses phone number: 734-762-0200
lori@lespritacademy.com**

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

Investigation of Complaints

In response to all complaints, the School promises prompt and equitable resolution through a reliable and impartial investigation of complaints, including the opportunity for both parties to present witnesses or other evidence. The time necessary to conduct an investigation will vary based on complexity but will generally be completed within sixty (60) days of receipt of the complaint. The School shall maintain confidentiality for all parties to the extent possible, but absolute confidentiality cannot be guaranteed. In cases where a student does not give consent for an investigation, the School will weigh the student's request for confidentiality against the impact on School safety to determine whether an investigation must proceed. Complainants should be aware that in a formal investigation due process generally requires that the identity of the charging party and the substance of the complaint be revealed to the person charged with the alleged harassment. The preponderance of the evidence standard will apply to investigations, meaning the School will evaluate whether it is more likely than not that the alleged conduct occurred. Both parties will receive simultaneous written notice of the outcome of the complaint.

During the investigation, the School will provide interim measures, as necessary, to protect the safety and wellbeing of students and/or employees involved. If the School determines that unlawful harassment or sexual violence has occurred, immediate appropriate corrective action will be taken in accordance with the circumstances involved, and the School will take steps to prevent the recurrence of any harassment or discrimination. Any employee determined by the School to be responsible for unlawful harassment or discrimination will be subject to appropriate disciplinary action, up to and including termination. Remedies for student-related claims may include, but are not limited to, an order to stay away, suspension or expulsion.

To initiate a criminal investigation, reports of sexual violence should be made to "911" or local law enforcement. The criminal process is separate from the School's disciplinary process. To the extent that an employee or contract worker is

not satisfied with the College's handling of a harassment or discrimination complaint, he or she may also contact the appropriate state or federal enforcement agency for legal relief.

Retaliation Prohibited

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

Reporting Misconduct for School Discipline

If you are a person who has experienced or thinks you have experienced a sexual offense, domestic violence, dating violence, or stalking, L'esprit Academy encourages you to file a report with local law enforcement. It should be noted that L'esprit Academy is also compelled to comply with laws that require the reporting of certain sexual offenses occurring on or near campus to local law enforcement. You have the choice of whether or not to file a report with local law enforcement and/or to proceed with legal action. The staff of L'esprit Academy will assist you in notifying the authorities if you so request. Upon your request, the School Director may accommodate changing classes and arranging for escorts.

To file a complaint against another individual within the school, you must send your written complaint to our corporate office. Your written complaint must contain detailed information on the date, time, incident, persons involved, witnesses, and any other information you feel would be pertinent for an internal discipline hearing. Once the complaint is received, it will be investigated by a member of the

Board. The Board Member may meet with the complainant to hear or clarify his/her account of the incident and review the disciplinary process. A formal investigation may be launched, which includes an initial meeting with the accused and an opportunity for the accused to also submit a written statement (generally within five business days and detailing the same information as requested by the complainant) in response to the allegations. After written statements are received, the Board Member may ask further clarifying questions of the complainant, accused, or witnesses. A determination will be made on whether to proceed with an internal disciplinary proceeding based on sufficient information that the allegations may have occurred. The allegations shall be reviewed by applying a preponderance of the evidence standard. This means that the complainant has the burden of proving the facts and claims asserted in the complaint. The internal disciplinary proceeding is a hearing. A three-person hearing panel will preside over the case. This panel will consist of General Manager, Board Member and one school staff member. A finding of guilty must be based on a unanimous vote. The accused and the complainant will each be allowed to choose one person, who has had no formal legal training, to accompany them throughout the hearing. These persons may only confer quietly or through notes with the complainant and accused and may not address the panel. Participants are reminded that any information shared during a hearing is confidential. The hearing panel will decide what testimony, witnesses, or other information is relevant, and may exclude information or a witness that is deemed duplicative or immaterial. The complainant or accused should inform an Executive Board Member, prior to the hearing, of the names of any witnesses he/she wishes to testify and to what they will attest. Witnesses should avoid hearsay.

The complainant and accused will receive verbal notification of the outcome of the hearing no sooner than two business days and no later than five business days after the hearing. Notification will be individually given to the accused and complainant at approximately the same time. Sanctions against the accused for a finding of guilty include, but are not limited to, termination, suspension, disciplinary probation, and/or other sanctions deemed appropriate by the hearing body. Students who are found guilty for a violation will have a right to appeal the sanctions set forth by the hearing panel.

Reporting Requirements

Victims of sexual misconduct should be aware that School administrators must issue timely warnings for incidents reported to them that pose a substantial threat of bodily harm or danger to other members of the campus community. The School

will make every effort to ensure that a victim's name and other identifying information is not disclosed, while still providing enough information for community members to make safety decisions in light of the danger. The School reserves the right to notify parents/guardians of dependent students regarding any health or safety risk, or a change in student status.

Additional Information

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

The Student Right to know act states that schools must notify students on where they can obtain information in regards to sex offenders who must register with the state. Students may obtain this information by contacting their local Police or by visiting the Michigan State Police website for offender registry at <http://www.communitynotification.com/>.

L'esprit Academy will not tolerate any form of sexual harassment, assault or violence, whether committed by a stranger or an acquaintance. Such behavior is a violation of the standards of the community and may be a criminal act under Michigan Law. This policy is intended to promote a community free of sexual misconduct, and to offer a process for reporting and addressing violations of the policy.

If you believe you have been sexually assaulted, your first priority should be to get to a place of safety. L'esprit Academy 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 for the proof of a criminal offense and a potential protection order. An assault should be reported directly to local police and/or Campus Security Authorities. Upon request, Campus Security Authorities will assist victims in reporting incidents of sexual assault to local police. Filing a police report will not obligate the victim to prosecute, nor will it subject the victim to scrutiny or judgmental opinions from officers. During L'esprit Academy's investigation of sexual assault allegations, both accused and accuser have the right to have others present during proceedings and to be informed of the outcome of disciplinary proceedings. If a final determination is made, based on the hearing proceeding listed above, that any student of L'esprit Academy is found to be committing acts of sexual misconduct in violation of the law on L'esprit Academy property or at L'esprit Academy events, they shall be subject to, at a minimum, the referral to counseling and automatic and immediate suspension or dismissal from school. L'esprit Academy imposed sanctions are additional to any legal actions taken by local, state or federal authorities. Student victims have the option to change their academic situation after an alleged sexual assault, if such changes are reasonably available.

The administrative offices for Student Support in conjunction with outside organization and agency assistance are available to assist with carrying out the provisions of the state and federal requirements.

US Department of Justice

<http://www.nsopw.gov/Core/Portal.aspx>

Megan's Law

<https://www.meganslaw.com>

INSTITUTIONAL SECURITY POLICIES AND CRIME STATISTICS

In compliance with the Federal Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics of 1998 (formally the Crime Awareness and Campus Security Act of 1990) the following information is provided. Campus crimes are defined as occurrences of:

- Murder and Non-Negligent

- Manslaughter
- Negligent Manslaughter
- Sex Offenses:
 - Rape
 - Fondling
 - Incest
 - Statutory Rape
- Robbery
- Aggravated Assault
- Burglary
- Motor Vehicle Theft
- Arson
- Hate Crimes (*if any of the above manifested evidence of prejudice based on race, gender, religion, sexual orientation, gender, gender identity, disability, ethnicity, or national origin*)
 - Simple Assault
 - Larceny-theft
 - Intimidation
 - Destruction/Damage/Vandalism of Property
- Arrests or Disciplinary Referrals for Illegal Weapons Possession and Substance Law Violations

Geographic areas associated with *The Clery Act*:

On-Campus – any building or property owned or controlled (leased) by an institution within the same reasonably adjoining geographic area and used by the institution in direct support of, or in a manner related to the institution’s educational purposes. These buildings include residential halls, any building or property that is owned by the institution but controlled by another person, those frequently used by students and those that support institutional purposes such as a food or retail vendor. ***Any on-campus buildings would be the school itself.***

Non-Campus – includes any building (or property) owned or controlled by student organizations recognized by the school; and any building or property owned or controlled by the school, that is not within the same reasonable adjoining area. ***L’esprit Academy does not have any non-campus buildings. This would not apply.***

Public Property – all public property, including thoroughfares, streets, sidewalks, and parking facilities, that is within the campus, or immediately adjacent to and accessible from the campus.

The procedure for reporting a crime is:

1. Immediately notify a staff member of L’esprit Academy and call 911 (Police Department) to file a report.
2. After a report has been filed, notify the School Director or Manager. An incident log must be completed. The log records are available in the operations office of each campus for public knowledge.

Programs designed to inform students and employees about campus security procedures:

Publications regarding campus security procedures and crime prevention awareness are distributed to new students and staff in their orientation package and available on an on-going basis in the Student Lounges or on the school website at www.lespritacademy.com

Monitoring of crime activity engaged in by students at off campus locations of student organizations:

Any organization having an off-campus school sponsored function is required to have a school advisor present.

Statement of policy regarding the possession, use, or sale of alcoholic beverages and illegal drugs:

Our "Drug-Free Workplace/School" policy and DAAPP regarding possession, use, sale of alcoholic beverages and illegal drugs, and a description of any drug and alcohol abuse education programs are distributed annually through staff and student orientation packets, on our website and are available upon request on an on-going basis.

CAMPUS SECURITY POLICIES

Campus Security Authorities and Jurisdiction

Campus Security Authorities (Operations Manager, School Manager and/or Lead Educator) have the authority to question all persons on school property to determine their legitimate presence and to escort unauthorized persons to the proper office or off school property, control the actions of persons violating school rules or local, state or federal laws and cooperate with local, state or federal law officers should that become necessary. All crime victims and witnesses are strongly encouraged to immediately report the crime to Campus Security Authorities and the appropriate police agency. All reports will be investigated. L'esprit Academy does not have procedures for voluntary, confidential reporting of crime statistics through pastoral or professional counselors. When a potentially dangerous threat to the L'esprit Academy community arises, timely reports or warnings will be issued per L'esprit Academy's Timely Warning Policy.

Campus Access

L'esprit Academy has no facilities for on-campus residences. L'esprit Academy will be open and available to clients and staff during all posted hours. Exceptions will be made during holidays or other special events. Those employees who have been given a key and security code are allowed to access the facility only as agreed upon by management. Accessing the facility during off hours for personal or professional use is prohibited unless authorized by management. The doors should remain locked before 8am and after 9:30 pm. When the school is opened for the day, both front access doors should be unlocked. Program management contact numbers into your cell phone in case of an emergency where access to the facility is necessary. It is imperative that all doors are properly secured at the end of the day, and the alarm set (if applicable) before leaving the facility. Please report any suspicious activity to police and management/owners immediately. Be aware and alert, especially at night, when entering or exiting the building. When possible, do not exit the building by yourself.

Reporting Crimes and Other Emergencies

L'esprit Academy in its policies encourages students, staff and the general public to voluntarily report crimes and other emergencies to Campus Security Authorities and local police in a timely manner. L'esprit Academy is limited in its ability to hold reports of crime in confidence as all reports are available for public examination. A crime and incident log is maintained in the administrative offices at each campus. In case of emergency at any L'esprit Academy location, dial 911 or use the "Panic Button" if available.

For non-emergencies Canton Police dial 734-394-5400.

For non-emergencies Royal Oak Police dial 248-246-3500.

Emergency Response and Evacuation

Students will be immediately notified of any significant emergency or dangerous situation involving an immediate threat to their health or safety. Campus Security Authorities and/or local authorities will, without delay, and taking into

account the safety of the community, confirm a significant emergency exists, determine who to notify, determine the content and means of the notification and initiate the notification system. In cases of fire, dangerous person, gas leak, electrical failure of an emergency level, the school must cease operations and evacuate per procedures. In the event the emergency requires persons within the school to evacuate, everyone should proceed calmly to the nearest exit and meet at the school's designated evacuation area. Evacuation plans are posted in several areas throughout the school. Emergency exits are clearly marked and all exit doors remain unlocked during school hours.

In the event the emergency requires persons within the school to seek shelter (like a tornado or weather emergency), everyone should proceed calmly to the school's designated shelter area. Everyone must remain in the shelter area until released to leave by Campus Security Authorities. L'esprit Academy periodically conducts announced and unannounced emergency response, evacuation and shelter drills to test emergency response and evacuation readiness, and documents the event in the Incident Log. See Operations Manual and postings for Evacuation Procedures at each facility.

Timely Warning

In the event that a situation arises, either on or off campus, that, in the judgment of the Campus Security Authorities, constitutes an ongoing or continuing threat, a campus wide warning will be issued to all students, faculty and staff through e-mail announcement, text messaging, the posting of flyers on campus, in-class announcements, or other appropriate means. The community will be made aware in a timely manner of any crimes, suspicious activities or other security problems through local police reports which are published in the local newspaper. Timely warnings will be given in situations of delayed openings, early dismissals, or unexpected school closure.

Bystander Intervention

It is important to stay safe in a situation of witnessing a crime. It is recommended to notice the event, recognize the risk, understand skills required to intervene, gather details, take responsibility for helping, and take action. For the following types:¹

Non-emergency Intervention:

- Don't make assumptions
- Keep your eyes open for red flags
- Set a goal or a plan
- In conversations, keep in mind it's about mutual respect

Emergency Intervention:

- Keep calm
- Know your exit strategy
- Understand situations can escalate quickly
- Be clear and concise when asking for help
- Keep yourself and others safe
- Tell whoever involved you are committed to helping
- Encourage value based decisions
- For additional resources see our website for important and useful links to suggestions on safety or visit <http://www.health.ny.gov/publications/2040>

Security Awareness Programs

¹ UNCW.edu "Bystander Accountability"

Prior to enrollment, all prospective students are provided a school catalog containing campus security procedures and practices. At orientation, students again review the school's campus security procedures and practices. All active students and staff receive updated campus crime data and information on campus security procedures and practices annually on October 1st as part of the school's annual security report and campus crime disclosure. Local law enforcement will make presentations on safety, crime prevention and on a periodic basis, at least annually.

The common theme of safety awareness is to encourage students and staff to be aware of their responsibility for their own security and the security of others in reporting and preventing crime. Students and staff should be assertive, trust your instincts, don't prop open self-locking doors, watch your keys, watch out for unwanted visitors, be wary of isolated spots, travel in groups or pairs, stay or walk in well lighted areas, report suspicious activities or persons, lock vehicles and personal belongings and know where local police and Campus Security Authorities can be reached at any time.

Crime Prevention Programs

For information on crime prevention programs and tips contact the local police department's crime prevention unit. L'esprit Academy does not offer on-campus crime prevention programs other than the law enforcement presentations.

Monitoring of Off-Campus Student Organizations

L'esprit Academy does not officially recognize any off-campus student organizations.

Preparing & Availability of Annual Security Report

L'esprit Academy's Campus Security Survey Administrator reports campus crime statistics for all of its campuses to the Department of Education for the three most recent completed years. This report is prepared in cooperation with local law enforcement agencies and Campus Security Authorities and is updated annually by October 1st. This report will be available on the school's website and hard copy in the Operations Office. Employees and students are notified of the ASR and any related updates via email. Prospect students and prospect employees are guided to the website for the information.

TOLL-FREE NATIONAL INFORMATION:

Al-Anon 1-800-356-9996

American Council on Alcoholism Help-line 1-800-527-5344

Cocaine Hotline 1-888-319-2606

National Council on Alcoholism 1-800-NCA-CALL

National Institute on Drug Abuse Hotline 1-800-662-HELP

National Suicide Prevention Hotline 1-800-273-8255

National Sexual Assault Hotline 1-800-656-HOPE

OTHER HEALTH ISSUES HOTLINE NUMBERS:

AIDS Hotline 800-CDC-INFO

Sexually Transmitted Diseases Hotline 800-227-8922

Smoking & Health 800-QUIT-NOW

Domestic Violence Hotline 800-799-7233

Child Abuse & Neglect 800-422-4453

Alcohol Treatment Referrals 800-662-4357

The Southeast Michigan Community Alliance (SEMCA) 800-686-6543

Detroit Wayne County Mental Health Agency 800-241-4949

Hegira Programs, Inc. 734-458-4601
Eating Disorders Counseling Associates 248-848-1558
AAA Pregnancy Resource Center 734-425-8060
Planned Family Centers 734-721-4700

CRIME STATISTICS

A copy of the Employee/Student Drug-Free Workplace/School Drug Prevention Policy Statement and Campus Crime Report is made available to active students, faculty, and staff. The report includes institutional policies concerning campus security, such as policies concerning sexual assault, and other matters. There were no reported hate crimes, either on-campus or off-campus, at any L'esprit Academy location during this reporting period.

CRIME STATISTICS REPORT

CANTON*2018 & 2019

*Data available only for reporting year 2018 and 2019 because the campus relocated in 2018.

	Criminal Offenses			
	On-Campus Property	Public Property	Residential Facilities	Non-Campus Property
A. Murder/Non-Negligent Manslaughter	0	0	0	0
B. Negligent Manslaughter	0	0	0	0
C. Rape	0	0	0	0
D. Fondling	0	0	0	0
E. Incest	0	0	0	0
F. Statutory Rape	0	0	0	0
G. Robbery	0	0	0	0
H. Aggravated Assault	0	0	0	0
I. Burglary	0	0	0	0
J. Motor Vehicle Theft	0	0	0	0
K. Arson	0	0	0	0
L. Simple Assault	0	0	0	0
M. Larceny-Theft	0	0	0	0
N. Intimidation	0	0	0	0
O. Destruction/Damage/ Vandalism of	0	0	0	0

Hate Crimes - On Campus

	<u>Race</u>	<u>Religion</u>	<u>Sexual Orientation</u>	<u>Gender</u>	<u>Disability</u>	<u>Ethnicity/ National Origin</u>
A. Murder/Non-Negligent Manslaughter	0	0	0	0	0	0
B. Negligent Manslaughter	0	0	0	0	0	0
C. Rape	0	0	0	0	0	0
D. Fondling	0	0	0	0	0	0
E. Incest	0	0	0	0	0	0
F. Statutory Rape	0	0	0	0	0	0
G. Robbery	0	0	0	0	0	0
H. Aggravated Assault	0	0	0	0	0	0
I. Burglary	0	0	0	0	0	0
J. Motor Vehicle Theft	0	0	0	0	0	0
K. Arson	0	0	0	0	0	0
L. Simple Assault	0	0	0	0	0	0
M. Larceny-Theft	0	0	0	0	0	0
N. Intimidation	0	0	0	0	0	0
O. Destruction/Damage/	0	0	0	0	0	0

Hate Crimes - Public Property						
	<u>Race</u>	<u>Religion</u>	<u>Sexual Orientation</u>	<u>Gender</u>	<u>Disability</u>	<u>Ethnicity/ National Origin</u>
A. Murder/Non-Negligent Manslaughter	0	0	0	0	0	0
B. Negligent Manslaughter	0	0	0	0	0	0
C. Rape	0	0	0	0	0	0
D. Fondling	0	0	0	0	0	0
E. Incest	0	0	0	0	0	0
F. Statutory Rape	0	0	0	0	0	0
G. Robbery	0	0	0	0	0	0
H. Aggravated Assault	0	0	0	0	0	0
I. Burglary	0	0	0	0	0	0
J. Motor Vehicle Theft	0	0	0	0	0	0
K. Arson	0	0	0	0	0	0
L. Simple Assault	0	0	0	0	0	0
M. Larceny-Theft	0	0	0	0	0	0
N. Intimidation	0	0	0	0	0	0
O. Destruction/Damage/	0	0	0	0	0	0

Violence Against Women Act				
	On Campus Property	Public Property	Residential Facilities	Non-Campus Property
A. Domestic Violence	0	0	0	0
B. Dating Violence	0	0	0	0
C. Stalking	0	0	0	0

Arrests				
	On Campus Property	Public Property	Residential Facilities	Non-Campus Property
A. Weapons: carrying, possessing, etc.	0	0	0	0
B. Drug Abuse Violations	0	0	0	0
C. Liquor Law Violations	0	0	0	0

Disciplinary Referrals				
	On Campus Property	Public Property	Residential Facilities	Non-Campus Property
A. Weapons: carrying, possessing, etc.	0	0	0	0
B. Drug Abuse Violations	0	0	0	0
C. Liquor Law Violations	0	0	0	0

ROYAL OAK 2017, 2018 & 2019

<u>Criminal Offenses</u>				
	<u>On-Campus Property</u>	<u>Public Property</u>	<u>Residential Facilities</u>	<u>Non-Campus Property</u>
A. Murder/Non-Negligent Manslaughter	0	0	0	0
B. Negligent Manslaughter	0	0	0	0
C. Rape	0	0	0	0
D. Fondling	0	0	0	0
E. Incest	0	0	0	0
F. Statutory Rape	0	0	0	0
G. Robbery	0	0	0	0
H. Aggravated Assault	0	0	0	0
I. Burglary	0	0	0	0
J. Motor Vehicle Theft	0	0	0	0
K. Arson	0	0	0	0

<u>Hate Crimes - On Campus</u>						
	<u>Race</u>	<u>Religion</u>	<u>Sexual Orientation</u>	<u>Gender</u>	<u>Disability</u>	<u>Ethnicity/ National Origin</u>
A. Murder/Non-Negligent Manslaughter	0	0	0	0	0	0
	0	0	0	0	0	0
	0	0	0	0	0	0
B. Negligent Manslaughter	0	0	0	0	0	0
C. Rape	0	0	0	0	0	0
D. Fondling	0	0	0	0	0	0
E. Incest	0	0	0	0	0	0
F. Statutory Rape	0	0	0	0	0	0
G. Robbery	0	0	0	0	0	0
H. Aggravated Assault	0	0	0	0	0	0
I. Burglary	0	0	0	0	0	0
J. Motor Vehicle Theft	0	0	0	0	0	0
K. Arson	0	0	0	0	0	0
L. Simple Assault	0	0	0	0	0	0
M. Larceny-Theft	0	0	0	0	0	0
N. Intimidation	0	0	0	0	0	0
O. Destruction/Damage/	0	0	0	0	0	0
	0	0	0	0	0	0
	0	0	0	0	0	0

Hate Crimes - Public Property

	<u>Year</u>	<u>Race</u>	<u>Religion</u>	<u>Sexual Orientation</u>	<u>Gender</u>	<u>Disability</u>	<u>Ethnicity/ National Origin</u>
A. Murder/Non-Negligent Manslaughter	0	0		0	0	0	0
	0	0		0	0	0	0
	0	0		0	0	0	0
B. Negligent Manslaughter	0	0		0	0	0	0
C. Rape	0	0		0	0	0	0
D. Fondling	0	0		0	0	0	0
E. Incest	0	0		0	0	0	0
F. Statutory Rape	0	0		0	0	0	0
G. Robbery	0	0		0	0	0	0
H. Aggravated Assault	0	0		0	0	0	0
I. Burglary	0	0		0	0	0	0

Hate Crimes - Public Property

	<u>Race</u>	<u>Religion</u>	<u>Sexual Orientation</u>	<u>Gender</u>	<u>Disability</u>	<u>Ethnicity/ National Origin</u>
J. Motor Vehicle Theft	0	0	0	0	0	0
K. Arson	0	0	0	0	0	0
L. Simple Assault	0	0	0	0	0	0
M. Larceny-Theft	0	0	0	0	0	0
N. Intimidation	0	0	0	0	0	0
O. Destruction/Damage/ Vandalism of Property	0	0	0	0	0	0
	0	0	0	0	0	0

Arrests

	<u>On Campus Property</u>	<u>Public Property</u>	<u>Residential Facilities</u>	<u>Non-Campus Property</u>
	0	0	0	0
A. Weapons: carrying, possessing, etc.	0	0	0	0
B. Drug Abuse Violations	0	0	0	0
C. Liquor Law Violations	0	0	0	0
	0	0	0	0

Disciplinary Referrals

	On Campus Property	Public Property	Residential Facilities	Non-Campus Property
	0	0	0	0
A. Weapons: carrying, possessing, etc.	0	0	0	0
B. Drug Abuse Violations	0	0	0	0
C. Liquor Law Violations	0	0	0	0

Violence Against Women Act

	On Campus Property	Public Property	Residential Facilities	Non-Campus Property
	0	0	0	0
A. Domestic Violence	0	0	0	0
B. Dating Violence	0	0	0	0
C. Stalking	0	0	0	0

