



# **Annual Security Report**

**Genesis – Cookeville Campus**

**Reporting Period 2020**

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## INTRODUCTION

Genesis Career Group, Inc. takes pride in providing a safe place for its students to learn and its employees to work. This document has been prepared to accomplish the following:

- 1. INCREASE AWARENESS OF THE SECURITY ON CAMPUS**
- 2. REPORT STATISTICS OF INCIDENTS OCCURRED DURING THE LAST YEAR OF OPERATION**
- 3. EXPLAIN CURRENT POLICIES, PROCEDURES, AND PROGRAMS AVAILABLE TO PROVIDE A SAFE LEARNING ENVIRONMENT**

The security of our campus is accomplished through the coordination of staff, faculty and students. The development of procedures, enforcement of regulations, and implementation of practices are important components of the joint effort providing a reasonable level of security for everyone on campus.

Campus administration is responsible for the implementation of security procedures and regulations on campus. Staff, faculty and students are individually responsible for adhering to security procedures and following the guidelines contained herein. All employees, students and visitors are responsible for complying with federal, state, and location regulations and laws related to matters of security while on campus or conducting institutional business off campus.

This information is disseminated to employees and students during the orientation process. Updates are made as needed and followed by notices describing the change to active students and employees. Updates are typically made electronically via email; however hard copies of the changes made are available on campus.

This Annual Security Report is published in compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act) and the Violence Against Women Reauthorization Act of 2013 (VAWA). The information contained within this report is gathered by collecting information regarding incidents via internal log and local police department filings of incidents occurred within the last reporting year.

The Compliance Department is responsible for compilation and filing of this report with the support of campus personnel. Data is reported by October 1 of each year. No campus is exempt from reporting.

## **SECURITY AND SAFETY PROCEDURES**

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This facility located at 880-A East 10<sup>th</sup> Street is open to students, staff, faculty and patrons only during the designated hours. The clinic is open to the public during these hours by appointment; however, in some instances walk-in are accepted. Appointments can be made through reception. All visitors must register with campus administration and are subject to rules and regulations of Genesis.

### **FACILITY MAINTENANCE AND SAFETY**

This facility is maintained regularly by the Director of Facility Maintenance (DFM) to ensure safety and security for students, staff, and faculty while one campus. Only Genesis employees will have access to keys. Students and visitors are not allowed on campus unless Genesis personnel are present. If the DFM is not immediately available in the case of emergency students, staff, faculty and visitors are obligated to report to the Campus or Program Director any maintenance needs within the facility that may or may not appear to be hazardous or present a safety concern.

### **DESIGNEES**

The Campus Director is designated as the Campus Security Authority (CSA) and is responsible for disseminating information regarding daily safety procedures in the case of emergency. The Director of Information Technology is responsible for the electronic dissemination of the Annual Security Report. The President is responsible for the overall coordination of safety procedures across all campuses. State and local police can provide campus security and are the only agents with the authority to make arrests. Campus personnel work closely with law enforcement agencies to ensure a safe environment for students, employees and visitors.

### **CRIMINAL ACTIVITY**

If a crime should occur on campus the employee or student with the most immediate knowledge of the crime should notify the CSA (Campus Director) or law enforcement immediately. The Campus Director will provide opportunity for the victim or witness to report the incident to local law enforcement. Genesis encourages its students, staff and faculty to report criminal activity to local law enforcement accurately and promptly if the victim declines or is unable to make the report. If the victim or witness to a crime declines to report the incident to the local police Genesis will treat the incident as an internal matter. The Campus Director will notify local authorities immediately if legally required to do so.

If a crime should occur after business hours the Campus Director will notify the local authorities immediately upon discovery of the occurrence. If the Campus Director is not on campus or readily available, the person with the most immediate knowledge of the crime should notify the local authorities immediately. In any case the notification should include at least:

1. THE NATURE OF THE CRIME

2. WHO WAS INVOLVED
3. WHERE THE CRIME OCCURRED

Anyone who notifies the Campus Director or law enforcement agencies of a crime committed may do so voluntarily. Every notification will be considered confidential. Genesis is obligated to include the report as voluntary and confidential within the Annual Security Report.

Genesis cooperates with federal, state, and local law enforcement agencies in reporting any information pertaining to criminal activity on campus. All students, staff, faculty and visitors are encouraged to report any information pertaining to a criminal offense to the local police department. Federal, state, and local law enforcement agencies have criminal jurisdiction on this campus as appropriate. Genesis reserves the right to treat any offense as a disciplinary matter in accordance with Institutional policies and procedures regardless of the involvement of law enforcement.

Genesis reserves the right to conduct an internal investigation and conduct disciplinary proceedings, if necessary, for any crimes of violence (as defined in Section 16 of Title 18, U.S. Code), or a non-forcible sex offense. The results of the investigation and/or disciplinary proceedings will be disclosed to the alleged victim of such crime or offense upon written request.

#### **ACCIDENTS OCCURRING ON CAMPUS**

If an accident occurs (i.e. broken glass, electrical hazard, chemical spill), the Campus Director or nearest employee will remove all students and visitors from the area. The Campus Director will then notify the proper authorities immediately or designate someone to do so if incapacitated.

#### **BODILY INJURY/SERIOUS ILLNESS**

If a student, staff member, or patron is injured on school premises immediately contact the nearest administrative staff member. A first aid kit is available near the cash register for minor injuries. For serious injuries or illnesses, call 911. Contact the nearest administrative staff member no matter how minor the injury might be.

#### **WEAPONS OR FIREARMS**

Possession of weapons or firearms of any kind are prohibited on campus by anyone other than authorized security personnel. Students, unauthorized staff, or faculty found in possession of weapons or firearms on campus will be subject to disciplinary action up to immediate termination.

## **PREVENTION OF SEXUAL HARASSMENT AND SEXUAL OFFENSES**

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Genesis prohibits the offenses of domestic violence, dating violence, sexual assault, and stalking. Genesis operates in accord with the Violence Against Women Act of 1994 (VAWA). Section 40002(a) of the VAWA defines new crime categories of domestic violence, dating violence, and stalking as follows:

**“DOMESTIC VIOLENCE”** means:

A “felony or misdemeanor crime of violence committed by –

- A current or former spouse or intimate partner of the victim
- A person with whom the victim shares a child in common
- A person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner
- A person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies (under VAWA), or
- 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 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”** means:

“Violence committed by a person –

- Who is or has been in a social relationship of a romantic or intimate nature with the victim; and
- Where the existence of such a relationship shall be determined based on the reporting party’s statement and with consideration of the following factors:
  - The length of the relationship;
  - The type of relationship; and
  - The frequency of interaction between the persons involved in the relationship”

For the purposes 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.

**“STALKING”** means:

“Engaging in a course of conduct directed at a specific person that would cause a reasonable person to

- Fear for his or her safety or the safety of others; or
- Suffer substantial emotional distress.”

**“SEXUAL HARASSMENT”** is defined by the U.S. Equal Employment Opportunity Commission (EEOC) as “unwelcome sexual advances, requests for sexual favors, and other verbal or physical harassment of a sexual nature when:

- Submission to the conduct is made either explicitly or implicitly a term or condition of an individual’s employment/enrollment;
- Submission to or rejection of such conduct by an individual is used as the basis for employment

- decisions affecting the individual; or
- The conduct has the purpose or effect of unreasonably interfering with the individual's performance or of creating an intimidating, hostile or offensive environment."

Sexual activity requires consent, which is defined as voluntary, positive agreement between participants to engage in specific sexual activity.

## **PREVENTION AND AWARENESS**

Resources on the prevention of sex offenses or other intimate partner violence prevention programs are available through campus administration. Information is available on risk reduction to recognize warning signs of abusive behavior and how to avoid potential attacks. Prevention programs are intended to prevent sex offenses, harassment, and domestic violence. These offenses include, but are not limited to, domestic violence, dating violence, stalking, intimate partner violence, and harassment.

Genesis may host professionals within the community to give presentations to promote awareness of sexual offenses. Local law enforcement agencies may also provide resources or give presentations on the consequences of such offenses and guidance for victims of sex crimes. Contact your Campus Director to inquire about available programs or to request a presentation. The following links provide information to increase awareness of rape, acquaintance rape, domestic violence, dating violence, sexual assault, and stalking, guidelines, victim's rights and legal options, if you or someone you know is a victim of a sexual offense, and the prevention of sex offenses.

National Hotlines and Helpful Links:

<http://victimsofcrime.org/help-for-crime-victims/national-hotlines-and-helpful-links>

<https://www.victimsofcrime.org/home>

<http://www.trynova.org/help-crime-victim/dsaacp/>

<http://www.cdc.gov/ViolencePrevention/sexualviolence/prevention.html>

<http://www.aequitasresource.org/training.cfm>

<http://www.breakthecycle.org/learn-about-dating-violence>

## **REPORTING PROCEDURES**

If you are a victim of a sexual offense or a witness to a sexual offense committed on campus you may seek assistance by contacting the Campus Security Authority (Campus Director) or any other campus staff or faculty member as you feel comfortable doing so. If you are more comfortable contacting local law enforcement agencies you are encouraged to do so. You are also encouraged to contact the National Sexual Assault Hotline at 1(800)-656-HOPE (4673). All reporting will be held confidential unless you request otherwise.

All victims of a sexual offense or witnesses to a sexual offense who report the incident to campus personnel have the right to also report the offense to local law enforcement agencies. Every victim or

reporting witness reserve the right to obtain a protective order, such as a restraining order to ensure his/her safety. Any protective order should be submitted to the Campus Director for campus personnel to assist in the victim or reporting witness' safety on campus.

## **INVESTIGATIVE AND DUE DILIGENCE PROCEDURES**

For offenses occurring on campus, Genesis reserves the right to investigate the incident while preserving the confidentiality of the reporting party. If the victim, witness or Institution feels the offense was criminal in nature Genesis will contact local law enforcement or aide the victim or witness in doing so. If you are a victim of a sex offense, domestic violence, dating violence, sexual assault, or stalking you should:

1. IMMEDIATELY GO TO A SAFE PLACE
2. SEEK MEDICAL TREATMENT IF NECESSARY
3. REPORT THE INCIDENT TO THE CSA OR LOCAL LAW ENFORCEMENT
  - a. CAMPUS OFFICIALS WILL ASSIST IN NOTIFYING THE AUTHORITIES IF YOU SO CHOOSE OR
  - b. YOU MAY OPT TO DECLINE NOTIFYING SUCH AUTHORITIES
4. REPORT THE INCIDENT AS SOON AS POSSIBLE AFTER THE OFFENSE OCCURRED
5. PRESERVE ANY EVIDENCE THAT MAY PERTAIN TO THE OFFENSE

Genesis will provide a prompt, fair, impartial investigation and resolution. The investigation will be conducted by officials who are qualified by receiving annual training on issues related to domestic violence, dating violence, sexual assault, and stalking and how to investigate and hearing process that protects the safety of victims and promotes accountability. Genesis reserves the right to outsource this to a qualified third party investigator.

An investigation of a sexual offense will include an interview with the accuser and the accused. Both are entitled to the same opportunities to have others present during institutional disciplinary proceeding, including the opportunity to be accompanied to any related meeting or proceeding by the advisory of their choice. Both will be informed simultaneously in writing of:

1. THE OUTCOME OF THE INSTITUTIONAL DISCIPLINARY PROCEEDING THAT ARISES FROM AN ALLEGATION OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING
2. THE INSTITUTION'S PROCEDURES FOR THE ACCUSED AND VICTIM TO APPEAL THE RESULTS OF THE INSTITUTIONAL DISCIPLINARY PROCEEDING.
3. ANY CHANGE TO THE RESULTS THAT OCCURS PRIOR TO THE TIME THAT SUCH RESULTS BECOME FINAL
4. WHEN THE RESULTS BECOME FINAL

Sanctions imposed because of the final determination may include disciplinary action including termination of enrollment or employment.

Appeals to the final determination must be made in writing and submitted to the Campus Director. The

appeal should include any records or documentation in support of the appeal and substantial evidence to overturn the determination. The appellant should include a narrative of why the decision should be overturned and the pending disciplinary action should be reversed.

A timely resolution of each incident will be reached and communicated to the victim/witness, the accused and the other parties involved. Appropriate corrective action, up to and including termination, will be taken promptly against any employee or student engaging in a sexual offense. Retaliation against any employee/student for filing a complaint or participating in an investigation is strictly prohibited. Any employee/student who knowingly makes a false claim of harassment or discrimination will be subject to corrective action, up to and including, termination.

It is Genesis' responsibility to take calculated actions to ensure a quick response to all sexual offense complaints. This policy has been written to ensure that all students, staff, faculty and visitors feel safe while on campus.

Any person, who brings a claim or complaint of discrimination or harassment, or who assists in the investigation of such claim or complaint, will not be adversely affected in the terms and conditions of employment/enrollment, or discriminated against or discharged because of the complaint or assistance. Complaints of such retaliation will be promptly investigated and, when warranted, the persons engaging in the retaliatory conduct will be subject to disciplinary action up to and including termination.

Genesis cooperates with federal, state, and local law enforcement agencies in reporting any information pertaining to sexual offense activity on campus. All students, staff, faculty and visitors are encouraged to report any information pertaining to a sexual offense to the local police department. Federal, state, and local law enforcement agencies have criminal jurisdiction on this campus as appropriate.

#### **COUNSELING FOR VICTIMS OR REPORTING WITNESSES**

All campus personnel may not be professionally trained in counseling victims of sexual offenses and should not act in a counseling capacity unless qualified to do so. Counseling services are available within the campus communities. Genesis strongly encourages victims of sexual offenses to contact the National Sexual Assault Hotline at 1(800) 656-HOPE (4673) to obtain local contact information for crisis centers equipped to counsel in health, mental health victim advocacy, legal assistance and other rehabilitation services. Campus personnel will be available to assist victims in contacting the hotline and local counselors if requested.

#### **REASONABLE ACCOMMODATION**

Genesis will assist in changing the academic, transportation, and working situations if so requested by a victim or a reporting witness. Proper accommodations may be met if they are reasonably available regardless of whether the victim or witness chooses to report the crime to local law enforcement.

These accommodations must be at the written request of the victim or reporting witness. Options for the accommodations will be discussed confidentially between the Campus Director, the Chief Operations Officer, and the President.

### **INFORMATION REGARDING REGISTERED SEX OFFENDERS**

Federal law enforcement information is available disclosing the information regarding sex offenders in campus communities as provided under section 170101(j) of the Violent Crime Control and Law Enforcement Act of 1994. The following links provide such information:

Tennessee: <https://www.tn.gov/tbi/general-information/redirect-tennessee-sex-offender-registry-search/sex-offender-registry-search.html>

### **DRUG AND ALCOHOL POLICY**

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GCC is committed to providing a safe, healthy, and efficient working environment for all employees/students. To help achieve this goal, employees/students are prohibited from:

- Possessing, distributing, selling, manufacturing, or being under the influence of any illegal drug;
- Consuming or selling alcoholic beverages while on campus, in company vehicles, or while on company business or time, or bringing alcohol onto campus; and
- Abusing prescription drugs or possessing drugs that have not been prescribed for the employee by physician.

The standards of conduct of this school clearly prohibit the unlawful possession, use or distribution of illicit drugs and alcohol by students and employees on its property or as a part of any of its activities. Possession, use, or distribution as mentioned above can result in prosecution by local, state, or federal authorities and conviction can result in fine, imprisonment, or both. Any student who violates this policy is subject to corrective action up to, and including, termination of enrollment. Use of some drugs is detectable for several days. Detection of such drugs or the presence of alcohol will be considered being “under the influence”.

Violations of this above mentioned policies occur when there is reasonable evidence of illegal prohibited activity. At this point the school will act against all violators. In addition, all evidence of illegal activities will be turned over to the appropriate law enforcement agencies. Genesis will provide timely written notice to any student who loses financial aid eligibility for violating this drug policy.

GCC reserves the right to request random drug tests for its employees and students. Refusal to submit to a drug and/or alcohol screen is grounds for immediate termination. Law enforcement may also be invited to check our campuses at any time with any means they deem necessary (i.e., drug dogs).

While GCC does not condone the abuse of alcohol, prescription drugs, and/or use of illegal drugs, GCC does recognize that addiction to drugs and/or alcohol can be treated. If a student recognizes a personal addiction or abuse problem and seeks assistance from management in advance of detection, GCC will assist the student in seeking treatment. The confidential nature of the employee's counseling and rehabilitation for drug and/or alcohol abuse will be preserved. Genesis implements policies to reduce access, identify substance abuse early, and provide students with access within their local community for necessary treatment.

Any employee or student that has been suspended or terminated based on violating this substance abuse policy that wishes to return to our schools must first provide legitimate evidence that he/she has entered and successful completion a recognized rehabilitation program and/or submits proof of negative drug screens.

Acceptable Legitimate evidence:

- For successful completion of Drug Rehabilitation Program would include but not be limited to: certified certificate of completion, certified release from facility which indicates successful completion of a rehabilitation program.
- For proof of Negative drug screens would include but not be limited to: original official drug screening results received by the school directly from the screening facility.

If approved to return, these students or employees must comply with random drug screens that are to be documented in the student/employee files. Requests for reinstatement must be in written form and submitted to the President, Richard Bundy. Decisions by the President on these matters are final

All information relating to drug and/or alcohol screens is to be kept strictly confidential. The information will be kept in the student's file. These medical files will be kept locked and secured, and access will be limited to certain individuals in the organization. Under no circumstances should the results of a drug and/or alcohol screen be discussed with individuals that do not have a work-related need to know. Our drug and alcohol policy is reviewed and evaluated every 2 years.

Drug abuse is extremely dangerous and can lead to dependency, addiction and death. Drug use and abuse causes approximately 20,000 deaths in the United States annually due to homicide and injuries, overdose, suicide, pneumonia, HIV infection, Hepatitis, and endocarditis.

<http://www.webmd.com/mental-health/addiction/substance-abuse#1>

## **SERVICES FOR ABUSE PREVENTION**

If any student, staff or faculty has questions or is seeking advice for substance abuse and the prevention thereof, confidential counseling services will be available on and off campus. For more information on counseling services and abuse awareness programs contact Dianne Pendergrass,

Campus Director at [dpendergross@genesiscareer.edu](mailto:dpendergross@genesiscareer.edu) or by calling (931) 526-8735.

## **EMERGENCY PROCEDURES AND TIMELY WARNING**

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Genesis takes pride in providing a safe and healthy atmosphere for students to learn. Genesis will provide students, staff, faculty and the local communities with timely and accurate information regarding any emergency occurring on campus. Genesis is committed to performing these notifications as quickly as possible as speed to contact is critical to the safety of all constituents on and off campus. While Genesis will notify students, staff and faculty annually about campus security procedures, students are encouraged to be responsible for their own security and the security of others. The following procedures should be followed:

### **FIRE EMERGENCY AND EVACUATION PROCEDURES**

If fire is detected, alert all students and staff members. Immediately vacate the building using the route indicated on the lighted exit signs located in each area of the campus. After leaving the building, call 911 at a neighboring establishment or using a mobile phone. The local area fire department assists in an annual emergency response evacuation drill.

### **TIMELY WARNING AND EMERGENCY NOTIFICATION**

If a threatening situation arises on campus students should alert the nearest staff or faculty member. The staff or faculty member will immediately notify the local police department, the Campus Director and the President by email or phone.

Genesis utilizes multiple media outlets to timely notify the campus community of threatening or emergency situations. Once the situation has been confirmed by the President, the Director of Technology will immediately send a notification via mass texts, email, social media, and local media outlets in television / radio to reach not only students and employees, but the larger community as well. The notifications will only be used if they do not compromise efforts to contain the emergency. The following information will be included in the notification:

1. THE NATURE OF THE POTENTIAL OR EXISTING THREAT
2. THE AREA OF CAMPUS THE THREAT IS OCCURRING
3. WHETHER THE CAMPUS IS SAFE TO RETURN
4. INFORMATION ON THE CANCELLATION OF CLASSES, IF NECESSARY
5. WHO TO CONTACT REGARDING MORE INFORMATION

Genesis will report in an accurate and timely manner to the campus community on crimes that:

1. ARE INCLUDED IN THE CAMPUS CRIME STATISTICS REPORT
2. ARE REPORTED TO LOCAL POLICE AGENCIES
3. CONSIDERED BY GENESIS TO REPRESENT A THREAT TO STUDENTS AND EMPLOYEES

Such reports will be provided to students and employees in a manner that is timely, that withholds the names of victims as confidential, and that will aid in the prevention of similar occurrences.

Emergency notification procedures are tested on an annual basis.

## **ANNUAL CRIME STATISTICS**

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Campus Annual Security Reports are distributed every October. To access the Genesis Career College Annual Security Report and crime statistics for the 2020 reporting period (2017-2019 Crime Statistics) simply click on the following links and entering "Genesis Career College" as name criteria:

Campus Safety and Security (Crime Statistics): <https://ope.ed.gov/campussafety/#/institution/details>

Annual Security Report: <https://www.genesiscareer.edu/consumer-information/campus-security-docs/>

You may request a hard copy of this report by contacting the Campus Director.