

# Williamson College of the Trades

## Title IX Non-Discrimination Policy & Grievance Process Manual

Title IX prohibits discrimination based on sex in all programs and activities offered by educational institutions receiving federal financial assistance, including in admissions and employment. Williamson College of the Trades<sup>1</sup> is committed to providing an educational and working environment conducive to its mission and one that is free from all forms of sexual discrimination, including sexual harassment, and retaliation. We are dedicated to ensuring a safe and inclusive campus climate for our students and employees that ensures equal access irrespective of sex, gender or gender identification. Through a comprehensive policy and clearly defined process, the college ensures compliance with Title IX.

This policy manual incorporates Title IX regulatory revisions effective August 14, 2020. Inquiries about the application of Title IX may be referred to the college’s Title IX Coordinator, to the Assistant Secretary of U.S. Department of Education, Office for Civil Rights, or both, using the contact information contained herein.

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### **I. PURPOSE AND SCOPE**

Williamson College does not discriminate on the basis of sex in its educational programs and activities, including in admissions and employment, as required by Title IX of the Education Amendments of 1972. Title IX provides that “No person in the United States shall, on the basis of

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<sup>1</sup> (“Williamson” or the “college”)

sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.”

## II. DEFINITIONS

The college’s Title IX program uses specific terminology in defining its policy and processes. The specific terms and definitions used in this program guide are in alignment with current federal and state law.

### **Sexual Harassment**

Sexual Harassment is defined as conduct on the basis of sex that satisfies one of the following conditions:

- An employee of the college (*recipient*) conditioning the provision of an aid, benefit, or service of the college based on an individual’s participation in unwelcome sexual conduct;
- Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to a college program or activity; or
- Sexual Assault, Dating Violence, Domestic Violence or Stalking as defined under the Clery Act:

**Sexual Assault** (*20 U.S.C 1092(f)(6)(A)(v)*) is defined as any forcible or non-forcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation (FBI). The FBI definition is “any nonconsensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks capacity to consent.”

**Dating Violence** (*34 U.S.C. 12291(a)(10)*) is defined as violence committed by a person (a) who is or has been in a social relationship of a romantic or intimate nature with the victim; and (b) where the existence of such a relationship shall be determined based on a consideration of the following factors: (i) the length of the relationship (ii) the type of relationship, and (iii) the frequency of interaction between the persons involved in the relationship.

**Domestic Violence** (*34 U.S.C. 12291(a)(8)*) includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, 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.

**Stalking** (*34 U.S.C. 12291(a)(30)*) is defined as engaging in a course of conduct directed at a specific person that would cause a reasonable person to— (a) fear for his or her safety or the safety of others; or (b) suffer substantial emotional distress.

**Actual Knowledge**

Defined as a notice of sexual harassment or allegation of sexual harassment to the college's Title IX Coordinator(s), or other official with authority to take corrective action, which the college has designated as the Dean of Students, or President.

**Complainant**

A complainant is defined as an individual who is alleged to be the victim of conduct that could constitute sexual harassment. However, it must be noted that any third party as well as the complainant may report sexual harassment.

**Consent**

An explicitly communicated, reversible mutual agreement in which all parties are capable of making a decision. Consent is informed, voluntary, and actively given. Consent exists when all parties exchange mutually understandable affirmative words or actions indicating their agreement to participate voluntarily in sexual activity. The following further clarifies the meaning of consent:

- Each participant in a sexual encounter must obtain consent for all sexual activities. Consent to one form of sexual activity does not constitute consent to engage in all forms of sexual activity.
- Consent consists of an outward demonstration indicating that a person has freely chosen to engage in sexual activity. Relying on non-verbal communication can lead to misunderstandings. Consent may not be inferred from silence, passivity, lack of resistance or lack of an active response alone. A person who does not physically resist or verbally refuse sexual activity is not necessarily giving consent.
- If at any time it is reasonably apparent that either party is hesitant, confused, or unsure, both parties should stop and obtain mutual verbal consent before continuing such activity.
- Consent may be withdrawn by either party at any time. Once withdrawal of consent has been expressed through words or actions, sexual activity must cease.
- A person who is physically incapacitated from alcohol or another drug consumption (voluntarily or involuntarily), or is unconscious, unaware, or otherwise physically impaired, is considered unable to give consent. For example, a person who is asleep or passed out cannot give consent.
- People with a previous or current intimate relationship do not automatically give either initial or continued consent to sexual activity. Even in the context of a relationship, there must be mutually understandable communication that clearly indicates consent to engage in sexual activity.

**Mandatory Reporting**

Given the importance of ensuring a person’s equal access to a college program or activity and the seriousness of an alleged act of sexual harassment, Williamson considers all employees *mandatory reporters* in exercising its Title IX policy. As a mandatory reporter, employees must report an act of sexual harassment or allegation of sexual harassment to the Title IX Coordinator listed below:

Title IX Coordinator: Dr. Todd Zachary  
Williamson College of the Trades, Rowan Hall  
106 S. New Middletown Road, Media PA 19063  
Phone: 610-566-1776, ext. 252, or cell 267-240-7116  
Email: tzachary@williamson.edu

**Respondent**

A respondent is defined as an individual who has been reported to be the perpetrator of conduct that could constitute sexual harassment.

**Retaliation** - Attempts or acts to seek retribution including, but not limited to, any form of intimidation, reprisal, harassment, or intent to prevent or require participation in the college’s Title IX grievance process. Employees or students alleging an instance of retaliation should promptly report it to the Title IX Coordinator listed below:

Title IX Coordinator: Dr. Todd Zachary  
Williamson College of the Trades, Rowan Hall  
106 S. New Middletown Road, Media PA 19063  
Phone: 610-566-1776, ext. 252, or cell 267-240-7116  
Email: tzachary@williamson.edu

**Supportive Measures**

Defined as individualized services provided to a complainant or respondent that are non-punitive, non-disciplinary, and do not unreasonably burden the other party, yet are designed to restore or preserve a person’s equal access to education. Examples of supportive measures may include, but not limited to, counseling services and administrative measures such as scheduling or dormitory assignment changes. Supportive measures will be offered to a complainant whether or not the grievance process has been initiated though the signing of a formal complaint.

**III. TITLE IX COORDINATORS & INVESTIGATOR**

**Title IX Staff:**

Title IX Coordinator: Dr. Todd Zachary  
Williamson College of the Trades, Rowan Hall  
106 S. New Middletown Road, Media PA 19063  
Phone: 610-566-1776, ext. 252, or cell 267-240-7116  
Email: tzachary@williamson.edu

Title IX Decision Maker: Mr. Tom Wisneski  
Williamson College of the Trades, Rowan Hall  
106 S. New Middletown Road, Media PA 19063  
Phone: 610-566-1776, ext. 231  
Email: [twisneski@williamson.edu](mailto:twisneski@williamson.edu)

Title IX Investigator: Mrs. Nancy Catania  
Williamson College of the Trades, Rowan Hall  
106 S. New Middletown Road, Media PA 19063  
Phone #: 610-566-1776, ext. 224  
Email: [ncatania@williamson.edu](mailto:ncatania@williamson.edu)

#### **IV. REPORT or FORMAL COMPLAINT of SEXUAL HARRASSMENT**

Williamson's Title IX program applies to all students and employees in the scope of the college's programs and activities. For the purpose of the Title IX policy, a college program or activity includes locations, events, or circumstances over which the college exercises substantial control over both the respondent and the context in which the sexual harassment occurred whether on or off campus. It also includes any building, owned or controlled by the college, and/or any organization that is officially recognized by the college. All Williamson employees are considered Mandatory Reporters, as defined in Section II.

Reports or formal complaints alleging sexual discrimination, sexual harassment, or retaliation may be filed at any time, including non-business hours, in person, by mail or by electronic mail, to:

Title IX Coordinator: Dr. Todd Zachary  
Williamson College of the Trades, Rowan Hall  
106 S. New Middletown Road, Media PA 19063  
Phone: 610-566-1776, ext. 252, or cell 267-240-7116  
Email: [tzachary@williamson.edu](mailto:tzachary@williamson.edu)

Reports or formal complaints may also be made through the college's *EthicsPoint* portal (<https://secure.ethicspoint.com/domain/media/en/gui/66349/index.html>). Anonymous reports are accepted and may give rise to a duty to investigate. The provision of supportive measures for a complainant will be impossible if their identity is unknown.

Students or employees may also contact the U.S. Department of Education, Office for Civil Rights (OCR) for additional information on Title IX legislation. Contact information is listed below:

Office for Civil Rights (OCR)  
U.S. Department of Education  
400 Maryland Avenue, SW  
Washington DC 20202-1100  
Phone: 800-421-3481  
Email: [OCR@ed.gov](mailto:OCR@ed.gov) Website: <http://www.ed.gov/ocr>

A formal complaint is a document filed by a complainant or initiated and signed by the college's Title IX Coordinator alleging sexual harassment against a respondent and requesting that the college investigate the allegation of sexual harassment. All formal complaints will be investigated.

Additionally, the following provisions are taken into consideration in regard to a formal complaint:

- At the time of filing a formal complaint, a complainant must be participating in or attempting to participate in an education program or activity at Williamson.
- The college will ensure a fair and equitable investigative and resolution process for all parties involved. The Title IX staff will conduct all aspects of the Title IX program without bias or conflict of interest.

Once a person reports an incident of sexual harassment, the college will promptly undertake the following measures:

- The Title IX Coordinator will contact the complainant confidentially to discuss the availability of supportive measures (with or without the filing of a formal complaint), consider the complainant's wishes in respect to supportive measures, and explain to the complainant the process for filing a formal complaint.
- At the time of filing a formal complaint, a complainant must be participating in or attempting to participate in a Williamson College of the Trades education program or activity.
- While the college's formal complaint form is easily accessible through the Title IX Coordinator or electronically through the college's website and student management portal, the complainant is not required to use the form to formally file a complaint. The complainant may file a formal complaint through a mailed or hand delivered letter or email provided it contains the *required information* identified in the college form.
- The Title IX Coordinator will respect the complainant's decision whether or not to file a formal complaint initiating an investigation. However, the Title IX Coordinator may still initiate and sign a formal complaint, thereby beginning an investigation, if in the opinion of the Coordinator such action is not unreasonable in light of known circumstances. In cases where the Title IX Coordinator signs a formal complaint, the Coordinator is not considered a complainant or a party during the grievance process and must comply with the requirement to be free from conflicts and bias.
- The Title IX Coordinator may discuss the reported incident with other members of the Title IX staff for recommendations and guidance as to whether the circumstances warrant the filing of a formal complaint by the Coordinator or to assist in the determination of whether the allegation meets the definition of sexual harassment under Title IX. This provides an additional resource in ensuring reported instances are promptly addressed by the college.

- If the allegation in the formal complaint does not meet the definition of sexual harassment as outlined within this manual, the college will dismiss the allegation in terms of Title IX consideration. However, this dismissal does not preclude the allegation being forwarded to the Dean of Students for consideration of a student code of conduct violation. If the formal complaint is dismissed, the Title IX Coordinator will provide both parties a written notice of dismissal (mandatory or discretionary) and the reasons for dismissal.

## V. TITLE IX GRIEVANCE PROCESS

### General Policies

Williamson College is committed to providing a consistent and transparent grievance process for resolving formal Title IX complaints. The college is committed to a thorough investigative and adjudication process that protects the rights of both the complainant and the respondent. The process will objectively evaluate all relevant evidence, inculpatory and exculpatory, while avoiding credibility determinations based on a person’s status (e.g. complainant, respondent, or witness) within the grievance process.

The practices and policies outlined within this section apply equally to both the complainant and respondent. The respondent is presumed not responsible for the alleged sexual harassment conduct until a determination regarding responsibility is made at the conclusion of the grievance process.

### Process Timeline

The college will make every effort to reasonably conclude the grievance process promptly following the timelines listed in Figure 1 below. However, the college reserves the right to extend these timelines within reason. Either party may submit a written request to the Title IX Coordinator for an extension upon a showing of good cause. In the event of an extension or delay the parties will be notified in writing and provided with updated estimates on the timeline.

<b>Figure 1: Williamson College of the Trades – Title IX Process Timelines</b>
Grievance Process:
<ul style="list-style-type: none"> <li>• Investigation: 40 Calendar Days</li> <li>• Review of Evidence and Opportunity for Comment by Both: 10 Calendar Days</li> <li>• Submission of Final Investigative Report: 10 Calendar Days Prior to Hearing</li> </ul>
Adjudication & Resolution: 15 Calendar Days
Appeal Process:
<ul style="list-style-type: none"> <li>• Submission of Appeal by Either Party: 10 Calendar Days</li> <li>• Appeal Review and Adjudication: 10 Calendar Days</li> </ul>

The college recognizes that the grievance process outlined in this policy manual applies only to investigation and adjudication of formal complaints under Title IX and has no applicability to criminal investigations. In instances where the college’s investigation may overlap with a concurrent law enforcement investigation into the same allegation, the college reserves the right to temporarily delay the investigation for a reasonable period. If a “good cause” delay is warranted,

the investigator will notify both parties in writing. While a delay due to a concurrent law enforcement investigation may be warranted, it does not relieve the college of conducting a thorough and fair investigation of a formal complaint under Title IX.

### Advisors

The parties have the right to select an advisor to assist them throughout the grievance process. All parties must notify the Title IX Coordinator in writing of the name and contact information of their selected advisor. Advisors can be, but are not required to be, attorneys. Advisors may accompany a party to any meeting or interview conducted in connection with the grievance process. However, an advisor's active participation is limited primarily to the cross-examination phase. Advisors are not an active participant in the college's investigative, resolution (to include the designation of remedies or disciplinary sanctions), or appeal process. This is not to suggest the college restricts either party (or their advisor's) ability to gather and present evidence, but that an advisor will not be an active participant in the college's execution of its grievance process.

### Freedom to Discuss the Allegations Under Investigation

The college does not restrict either party's right to discuss the allegations under investigation. However, in no way does this immunize a party from abusing this right by, for example, discussing those allegations in a manner that exposes the party to liability for defamation or related privacy torts, or in a manner that constitutes unlawful retaliation. The college will investigate and take action against all forms of retaliation.

### Consolidation of Formal Complaints.

The college reserves the right to consolidate formal complaints as to allegations of sexual harassment against more than one respondent, or by more than one complainant against one or more respondents, or by one party against the other party, where the allegations of sexual harassment arise out of the same facts or circumstances. In instances where the grievance process involves more than one complainant or more than one respondent, references in this manual to the singular "party," "complainant," or "respondent" include the plural, as applicable.

### **Investigative Process**

Upon receipt of a formal complaint the college will initiate a thorough investigation of the allegations. Conducted by the college's Title IX Investigator, the process begins with written notice to both parties of the allegations and commencement of an investigation.

The burden of gathering evidence and proof throughout the process remains with the college. However, this does not prevent either party from presenting witnesses, including fact and expert witnesses, and other inculpatory and exculpatory evidence. Legally privileged information is excluded from the grievance process and the college cannot access, consider, disclose, or otherwise use a party's records that are made or maintained by a physician, psychiatrist, psychologist, or other recognized professional or paraprofessional acting in the professional's or paraprofessional's capacity, or assisting in that capacity, and which are made and maintained in connection with the

provision of treatment to the party, unless the college obtains that party's voluntary, written consent.

The Title IX Investigator will send written notice of any investigative interview or meeting to the parties providing sufficient time for the party to prepare.

The college will ensure that all parties have an equal opportunity to inspect and review *any evidence* obtained during the investigation that is directly related to the allegations in the formal complaint. The Title IX Investigator will send to each party and the party's advisor, if any, the gathered evidence subject to inspection and review in an electronic format or a hard copy. This *includes* evidence upon which the college does not intend to rely upon in reaching a determination regarding responsibility and includes inculpatory or exculpatory evidence whether obtained from a party or other source. The parties will have ten (10) calendar days to submit a written response, which the investigator will consider prior to completion of the investigative report. The Title IX Investigator must take into consideration the parties' responses and then determine what evidence is considered relevant to be included in the investigative final report. Once complete, the parties will be provided a copy of the final investigative report at least ten (10) calendar days in advance of any hearing.

If a party, before or after a notice of allegation, manipulates his/her testimony, or tampers with or destroys evidence, the investigation and subsequent adjudication will account for such conduct, so that a party's attempt to fabricate or falsify information would be part of the objective evaluation of evidence. For example, if a party knowingly manufactures a false narrative with respect to the allegation, the other party and the investigator have the opportunity to question the party about his/her statements and reveal inaccuracies, inconsistencies, or false statements. Similarly, if a witness crafts or manipulates his/her own testimony, inaccuracy and untruthfulness can be revealed through questioning of the witness by the parties and the investigator. If a party, before or after a written notice of allegation attempts to intimidate witnesses, such conduct will be considered retaliation.

The college may dismiss the formal complaint or any allegation therein, if at any time during the investigation or hearing: a complainant notifies the Title IX Coordinator in writing that the complainant would like to withdraw the formal complaint or any allegations therein; the respondent is no longer enrolled or employed by the college; or specific circumstances prevent the college from gathering evidence sufficient to reach a determination as to the formal complaint or allegations therein. However, in cases where the complainant has withdrawn the formal complaint, the Title IX Coordinator may still initiate and sign a formal complaint, thereby continuing the investigation, if in the opinion of the Coordinator, such action is not unreasonable in light of known circumstances. If the formal complaint is dismissed, the Title IX Coordinator will provide both parties a written notice of dismissal (mandatory or discretionary) and the reasons for dismissal.

A complainant will still receive notifications about the grievance process (to include the investigative report) even where the complainant does not wish to participate in the process and the formal complaint was initiated or continued by the Title IX Coordinator. Although a complainant who did not wish to file a formal complaint and does not want to participate in a grievance process may not want to receive notifications throughout the grievance process, the

college will treat the complainant as a party by sending required notices. The requirement to send the complainant notification is intended to preserve the complainant's right to choose to participate, not to pressure the complainant into participating. This practice is also applied equally to respondents who choose not to participate in the grievance process.

### Investigative Report

At the conclusion of the investigation, the Title IX Investigator will provide both parties a final report summarizing all *relevant* evidence including inculpatory and exculpatory evidence. Evidence about a complainant's prior sexual behavior will be considered irrelevant and therefore not included within the investigative report, with two limited exceptions; if offered to prove that someone other than the respondent committed the alleged sexual harassment, or if the question or evidence concerns sexual behavior between the complainant and the respondent and is offered to prove consent.

### Hearing

Once the final investigative report is completed and submitted to both parties, the Decision Maker will send all parties, including designated advisors if any, written notice of the live hearing. A live hearing may be conducted with all parties, witnesses, advisors, and other participants physically present in the same location. However, at the request of either party, or at the discretion of the Decision-Maker, the live hearing may be conducted virtually. A written transcript or electronic recording will be made of the live hearing.

During the hearing, each party's advisor will be allowed to ask the other party and any witnesses all relevant questions and follow-up questions, including challenging credibility. The cross examination will occur in real-time and only by the party's advisor, never by a party or witness personally. If a party does not have his/her own advisor of choice at the live hearing, the college will provide that party (at no fee or charge) an advisor of the college's choice, for the purpose of conducting the cross-examination. The provided advisor may be, but does not need to be, an attorney.

Only relevant cross-examination and other questions may be asked of a party or witness. Before a complainant, respondent, or witness answers a cross-examination or other question, the Decision-Maker must first determine whether the question is relevant and explain to the party's advisor any decision to exclude a question as not relevant. The Decision-Maker will ensure rape shield protections are observed for complainants by prohibiting questions and evidence about a complainant's prior sexual behavior or sexual predisposition unless directly offered to prove that someone other than the respondent committed the alleged misconduct or to prove consent. If a party or a witness does not submit to cross-examination at a live hearing, the Decision-Maker will not rely on any statement from the party or witness in reaching a determination. However, the Decision-Maker may not draw any inference *solely* from a party's or witness's absence, or refusal to answer relevant questions during the hearing.

## **Adjudication**

Williamson College of the Trades uses the *Preponderance of Evidence* as its standard of evidence in all Title IX proceedings, regardless of whether the complainant or respondent is a student or employee. The college's Title IX grievance process is structured to reach a fair, reliable, and accurate outcome equally giving both parties equal opportunities to present evidence, so that ultimately the Decision-Maker can objectively evaluate relevant evidence and understand each party's respective arguments on whether evidence is persuasive or should lead to the outcome desired by either party.

Once concluded, the Decision-Maker will issue a written determination regarding responsibility with findings of fact and conclusions about whether the alleged conduct occurred, the rationale for the result as to each allegation, procedural steps taken during the grievance process, any disciplinary sanctions imposed on the respondent and whether remedies will be provided to the complainant or respondent. The written determination will be sent simultaneously to both parties along with information on how to file an appeal.

## **Remedies and Disciplinary Sanctions**

The college exercises its rights under Title IX to provide complainants and respondents with remedies designed to restore or preserve access to education following a determination regarding responsibility as outlined within this manual. Given the wide variance of actions defined under Sexual Harassment, to include Sexual Assault, Dating Violence, Domestic Violence or Stalking, the college reserves the right to determine disciplinary sanctions for both students and employees on a case-by-case basis dependent on the severity of the action. Sanctions can include, but are not limited to, disciplinary probation, changes to dormitory assignment or course schedule, counseling, administrative leave, suspension or expulsion/discharge.

## **Appeals**

Either party may file an appeal of a determination of responsibility or of the dismissal of a formal complaint by the college for the following reasons:

- Procedural irregularity that impacted the outcome of the proceeding
- Newly discovered evidence that may impact the outcome of the proceeding
- The Title IX staff involved in the reporting, investigative, or adjudication process had a conflict of interest or bias that affected the outcome of the process

Parties have seven (7) calendar days to appeal the college's decision. Once the appeal deadline has expired, determinations are considered final. All appeals must be submitted in writing, either in hard copy or electronically, to the college President, who functions as the appeal authority. The appeal request must contain a reason for the appeal outlined in this section. Both parties will be given an equal opportunity to submit a written statement of support of, or challenging, the determination. The President will review all relevant evidence in addition to the investigative and adjudication process used in addressing the allegation when considering an appeal decision. Once

completed, the President will issue a written determination that will be provided simultaneously to both parties.

### **Emergency Actions**

Title IX provides institutions with the latitude to remove a respondent from the college on an emergency basis, without a hearing beforehand. The college reserves the right to exercise its discretion in removing a respondent if he/she poses an immediate threat to a person's health or safety, including the right to place an employee on administrative leave. The college will implement the least restrictive emergency action possible in light of the circumstances and safety concerns. In this case, the President will provide written notification to the respondent and complainant of the action undertaken. The respondent may challenge the emergency removal by contacting the Title IX Coordinator.

Facts and evidence relied on during an emergency removal decision and post-removal challenge procedure may be relevant in a subsequent grievance process against the respondent but would need to meet the evidence requirements outlined in this policy manual. For example, a witness who provided information to the college that contributed to the emergency removal decision would need to appear and be cross-examined at a live hearing as outlined within this manual in order for the witness's statement to be relied on by the Decision-Maker.

### **Confidentiality**

The college will, to the extent possible, keep confidential the identity of any individual who has made a report or filed a formal complaint of sex harassment, any complainant, any individual who has been reported to be the perpetrator of sex discrimination, any respondent, and any witness (unless permitted by FERPA, or required under law, or as necessary to conduct proceedings under Title IX).

### **Retaliation**

College policy, in alignment with Title IX, specifically prohibits any person from intimidating, threatening, coercing, or discriminating against any individual for the purpose of interfering with any right or privilege secured by Title IX including, among other things, making a report or formal complaint of sexual harassment. Employees or students alleging an instance of retaliation should promptly report it to the Title IX Coordinator listed below:

Title IX Coordinator: Dr. Todd Zachary  
Williamson College of the Trades, Rowan Hall  
106 S. New Middletown Road, Media PA 19063  
Phone: 610-566-1776, ext. 252, or cell 267-240-7116  
Email: tzachary@williamson.edu

The college will protect individual rights afforded under the First Amendment as this does not constitute retaliation. However as previously noted in this manual, this in no way immunize a party from abusing the right to "discuss the allegations under investigation" by, for example, discussing

those allegations in a manner that exposes the party to liability for defamation or related privacy torts, or in a manner that constitutes unlawful retaliation.

The college reserves the right to charge an individual with a conduct code violation for retaliation that does not involve sexual harassment if the offending party interferes with any right or privilege secured by Title IX.

The college reserves the right to charge an individual with a code of conduct violation for making a materially false statement in bad faith as part of a Title IX grievance proceeding. This does not constitute an act of retaliation, however a determination of responsibility, alone, is not sufficient to conclude that any party made a materially false statement in bad faith.

## **Off Campus Resources**

### *Community Resources*

- Delaware County Mobile Crisis Unit- Project REACH: 610-352-4703
- Delaware County Sexual Assault Hotline: 610-566-4342
- Delaware County Domestic Violence Hotline: 610-565-4590
- Riddle Memorial Hospital: 484-580-1000 or 866-CALL-MLH
- Crozer Chester Hospital: 610-447-2000
- Philadelphia Mobile Crisis Unit: 215-685-6440
- Philadelphia Sexual Assault Hotline: 215-985-3333
- Philadelphia Domestic Violence Hotline: 1-866-SAFE-014
- Philadelphia Sexual Assault Response Center: 215-425-1374
- Pennsylvania Child Abuse Reporting Line: 1-800-932-0313

### *National Hotlines* (Note: National hotlines will provide local resources for callers.)

- Suicide Prevention Lifeline: 1-800-273-8255
- Sexual Assault Hotline: 1-800-656-4673
- Domestic Violence: 1-800-799-7233

### *Websites*

- RAINN- Rape Abuse Incest National Network [www.rainn.org](http://www.rainn.org)
- PCAR-Pennsylvania Coalition Against Rape [www.pcar.org](http://www.pcar.org)
- Domestic Abuse Project of Delaware County <http://www.dapdc.org/>
- National Suicide Prevention <http://suicidepreventionlifeline.org/>
- Pennsylvania Office of the Attorney General <https://www.attorneygeneral.gov/>

## **VI. TITLE IX PROGRAM MANAGEMENT**

The college is committed to ensuring all students and employees receive annual training on its Title IX process and reporting policy. Training includes an overview of the college's Title IX policy manual in alignment with Federal law, to include how to report a potential act of sexual harassment. Williamson's Title IX Policy Manual is available electronically through the college's website, Student Management System, and the college's third-party anonymous reporting tool, *EthicsPoint*.

The college also ensures the broader educational community, to include applicants for admission and employment, are aware of how to report to the Title IX Coordinator. This is accomplished through the college's website, college catalog, student handbook, admissions materials, and employment applications.

The college maintains all information related to a report or formal complaint, including provision of supportive measures (or decisions not to provide supportive measures), investigations, hearings, appeals and all training materials for a period of at least seven years.