



SEXUAL VIOLENCE OR HARRASMENT POLICY	Date: December 2020
	Revision Date:
Approval:	

Policy:

The management of Behaviorprise College is committed to the prevention of campus sexual violence/harassment and is ultimately responsible for staff and students’ health and safety. We will take whatever steps are reasonable and necessary to protect our staff and students from campus violence and harassment from all sources.

Behaviorprise Management will adhere to this policy and the supporting procedure. Behaviorprise Management is responsible for ensuring that measures and procedures are followed by all students and employees of the college and that students and college staff have the information they need to guard against campus violence and/or harassment. We will also ensure that should a student or college staff go through any campus violence and/or harassment, a clear guideline on what to do is outlined and that appropriate supports are provided.

SECTION I: DEFINITIONS

The following definitions are intended to assist in the interpretation of this Policy, as well as other related College policies:

Members of the College Community: Includes students, faculty, contractors, visitors and all employees of Behaviorprise College.

Complainant: A Member of the College has disclosed or reported an incident of Sexual Violence experienced by that individual.

Respondent: Someone against whom an allegation of Sexual Violence has been made.

Disclosure: The sharing of information by an individual with a Member of the College Community regarding an incident of Sexual Violence experienced by that individual.

Reporting: The sharing of information by an individual with a designated Member of the college community regarding an incident of Sexual Violence experienced by that individual, with the intention of

initiating one of the processes set out in this Policy, which could result in disciplinary action being taken against the Member of the college community alleged to have committed Sexual Violence.

Incident of Sexual Violence: Includes any instance of Sexual Violence, including Sexual Harassment and all associated definitions provided herein.

Sexual Violence: Any sexual act or act targeting a person's sexuality, gender identity or gender expression, whether the act is physical or psychological in nature, that is committed, threatened or attempted against a person without the person's consent, and includes Sexual Assault, Sexual Harassment, stalking, indecent exposure, voyeurism, and sexual exploitation.

Sexual Harassment: Includes but is not limited to engaging in a course of vexatious comments or conduct that is known or ought to be known to be unwelcome. For the purpose of this Policy, Sexual Harassment includes workplace sexual harassment. Sexual Harassment includes any sexual solicitation or advance made by a person in a position to confer, grant or deny a benefit or advancement to the person where the person making the solicitation or advance knows or ought reasonably to know that it is unwelcome. Sexual harassment also includes a reprisal or a threat of reprisal for the rejection of a sexual solicitation or advance, where the reprisal is made or threatened by a person in a position to confer, grant or deny a benefit or advancement to the person.

Sexual Assault: Any form of sexual contact without a person's consent, including the threat of sexual contact without consent. A Sexual Assault can range from unwanted sexual touching to forced sexual intercourse; and a Sexual Assault can involve situations where sexual activity is obtained by someone abusing a position of trust, power or authority.

Policy on Sexual Violence and Sexual Harassment including Cyber Sexual Violence: Includes but is not limited to knowingly publishing, distributing, transmitting, selling, making available or advertising an intimate image of a person, knowing that the person depicted in the image did not give their consent to that conduct, or being reckless as to whether or not that person gave their consent to that conduct. An intimate image includes but is not limited to a visual recording of a person made by any means, including a photographic, digital or video recording, in which the person is nude and/or engaged in sexual activity. For the purpose of this Policy, Sexual Violence includes Cyber Sexual Violence.

Cyber Sexual Harassment: Includes but is not limited to Sexual Harassment conducted in whole or in part through electronic means, such as email, web postings, text messaging, and other forms of electronic behaviour. For the purpose of this Policy, Sexual Harassment includes Cyber Sexual Harassment.

Gender-based Harassment: Includes but is not limited to engaging in a course of vexatious comment or conduct related to a person's sex, gender, sexual orientation, gender identity or gender expression that is known or ought reasonably to be known to be unwelcome.

Consent: The voluntary agreement of an individual to engage in a sexual act. Consent is positive, active and ongoing, and can be revoked at any time. Consenting to one kind of sexual act does not mean that consent is given for another sexual act or kind of activity. Consent is NOT obtained where a person is incapable of consenting – for example due to intoxication, or where a person is induced to engage in the

activity by someone abusing a position of trust, power or authority. As per the Criminal Code of Canada, it is not a defence to an allegation of Sexual Violence that the Respondent believed that the Complainant consented to the activity that forms the subject matter of the complaint, where (a) the Respondent's belief arose from the Respondent's (i) self-induced intoxication; or (ii) recklessness or wilful blindness; or (b) the Respondent did not take reasonable steps, in the circumstances known to the accused at the time, to ascertain that the Complainant was consenting.

Non-adjudicative Resolution: this term refers to a resolution of the matters alleged in a Report that is agreed to by both the Complainant and the Respondent.

Policy on Sexual Violence and Sexual Harassment

1. All members of the College community should have the ability to study and work in a campus environment free from Sexual Violence, including Sexual Assault and Sexual Harassment. Sexual Violence is a serious issue that undermines the health, well-being, and security of individuals, communities, and society. Addressing the causes and consequences of Sexual Violence requires the deliberate and collective efforts of governments, institutions, and citizens.
2. The College is committed to making available programs and resources to educate its community on the prevention of and response to Sexual Violence. The College is committed to responding to and addressing incidents and complaints of Sexual Violence involving its students, staff and faculty, and to ensuring that those members of the community who are affected by Sexual Violence receive support.
3. The College recognizes that Sexual Violence can occur between individuals regardless of sex, sexual orientation, gender, gender identity or expression, or relationship status. The College recognizes the intersection of Sexual Violence with discrimination and harassment, including but not limited to the grounds set out in the Ontario Human Rights Code. The College recognizes that individuals from historically marginalized communities may be disproportionately affected by Sexual Harassment and Sexual Violence.
4. Sexual Violence can be committed against any person and is an issue that requires an inclusive response. The College recognizes that Sexual Violence is overwhelmingly committed against women, and in particular women who experience the intersection of multiple identities such as, but not limited to, indigenous women, women with disabilities, and racialized women. Additionally, the College recognizes that those whose gender identity or gender expression does not conform to historical gender norms are also at increased risk of Sexual Violence.
5. The College recognizes that individuals who have experienced Sexual Violence experience a range of effects that can profoundly affect their lives.

SECTION II: APPLICATION AND SCOPE

6. This Policy applies to all Members of the College Community and all Members of the College Community will be offered appropriate support with respect to issues of Sexual Violence, regardless of their role in the College or the role of the person against whom an allegation is made. This Policy relies on a centralized system of Reporting, investigation and decision-making for complaints of Sexual Violence in order to avoid actual or perceived conflicts of interest or

reasonable apprehension of bias, to preserve privacy, to minimize risk of reprisal, and to ensure coordination and consistency across all academic divisions and campuses.

7. The Reporting procedure and the processes it initiates apply to all incidents of Sexual Violence in which both the Complainant and the Respondent are Members of the College Community, regardless of whether the event occurred on campus, off campus, or using social media or other electronic media.
8. Support will be made available under this Policy to Complainants regardless of whether the Respondent is a Member of the College Community.

SECTION III: EDUCATION, SUPPORT AND RESOURCES

9. The College provides support to Members of the College Community who have experienced Sexual Violence and to those who receive a disclosure or report of an incident of Sexual Violence. See Disclosure section below
10. The College's office (Office) dedicated to prevention and support of Sexual Violence is made up of the School Director and the Campus Administrator. The Office has the mandate to conduct intake, accept Disclosure and Reporting of Sexual Violence, and provide support to individual Members of the College Community who have experienced Sexual Violence. The Office will also provide education and training to Members of the College Community with respect to how to respond to Disclosures of Sexual Violence and how to support Complainants.
11. The College provides Sexual Violence education and prevention education for all Members of the College Community, including training on this Policy and awareness programs about Sexual Violence and personal safety. The College provides orientation and/or training on this Policy to Members of the College Community who are likely to receive Disclosures or Reports to support those who disclose with dignity and compassion and to inform them of their options in a safe and supportive manner.

SECTION IV: PRINCIPLES RESPECTING PROCESS

12. A person who has made a Disclosure and/or a Report of Sexual Violence has autonomy in decision making, and in particular with respect to whom to Disclose, whether to Report, whether to pursue recourse to the criminal or civil justice systems, and whether to access support and accommodations as provided.
13. The College is committed to the provision of a fair process for all parties and one that respects due process and procedural fairness. We are committed to reducing barriers to Disclosure and Reporting of incidents of Sexual Violence. In that regard, Complainants will not be asked to repeat their accounts more than is necessary for the implementation of this Policy and the College process will appropriately accommodate the needs of Members of the College Community who are affected by Sexual Violence.
14. The College will not tolerate any retaliation, through any means including through social or other electronic media, against anyone who discloses or Reports an incident of Sexual Violence, or who participates in a College process that is addressing allegations of Sexual Violence against a Member of the College Community.

15. Confidential counselling and support will be made available as quickly as practicable and at no cost to any Member of the College Community who experiences an incident of Sexual Violence. We will respond to Disclosures and/or Reports of Sexual Violence fairly and expeditiously.

SECTION V: CONFIDENTIALITY AND PRIVACY

The College will treat Disclosures and Reports of an incident of Sexual Violence in a confidential manner and in accordance with the Freedom of Information and Protection of Privacy Act. The College will limit sharing of information to those within the College who need to know the information for the purposes of implementing this Policy, including providing accommodation, interim conditions and interim measures, and the investigation and decision-making processes; and taking corrective action resulting from those processes. For example, where a Complainant wishes to make a Report, fairness to the Respondent will require disclosure of the Complainant's identity and the material allegations being made. Confidentiality cannot be maintained where information needs to be disclosed in order to address a risk to the health and safety of Members of the College Community or where the College is obliged by law to disclose the information. For example, confidentiality cannot be maintained where:

- a. an individual is at risk of imminent and serious harm to themselves or others;
- b. Members of the College Community may be at risk of harm; and/or
- c. reporting or investigation is required by law (for example, but not limited to, an incident involving a minor, or obligations related to occupational health and safety or to human rights legislation).

SECTION VI: ACCESSING THE POLICY: DISCLOSURE AND REPORTING

16. Disclosure and Reporting are separate actions that the Complainant can choose to take. The Office offers confidential support and services to those who have experienced Sexual Violence.
17. Disclosure is the sharing of information by an individual with a Member of the College Community regarding an incident of Sexual Violence experienced by that individual.
18. Reporting is the sharing of information by an individual with a designated Member of the College Community regarding an incident of Sexual Violence experienced by that individual, with the intention of initiating one of the processes set out in this Policy, which could result in a disciplinary action being taken against the Member of the College Community alleged to have committed Sexual Violence. The Office receives and also manages Sexual Violence Reporting.
19. A Member of the College Community who witnesses an incident of Sexual Violence affecting another Member of the College Community should contact the Office. The College recognizes that an individual who has experienced an incident of Sexual Violence may require time and reflection before making the decision as to whether or not they wish to make a Disclosure or a Report of the incident. Notwithstanding those considerations, individuals who have experienced an incident of Sexual Violence are encouraged to make a Disclosure and/or Report as soon as they are able to do so, recognizing that the passage of time may affect the College's ability to address the issues raised by a Disclosure or a Report.

SECTION VII: DISCLOSURE

20. A Disclosure does not result in a Report being made and does not initiate a process to address the incident of Sexual Violence. The decision to Disclose and the decision to Report are separate decisions. A Disclosure can be made to any Member of the College Community. A Disclosure may relate to a Respondent who is or is not a Member of the College Community. The Office is the first point of contact for a Member of the College Community affected by an incident of Sexual Violence to obtain academic, employment, or other accommodations and services. A Member of the College Community who receives a Disclosure should inform the Complainant about this Policy and direct them to the Office.
21. The College recognizes that such Disclosures are often shared in confidence, that the Complainant may have an expectation of confidentiality, and that in many cases confidentiality is essential in order for Complainants to come forward. The person to whom the Disclosure is made may consult with the Office for advice but except as directed by the Complainant or as indicated by the provisions in the "Confidentiality and Privacy" section of this Policy, is expected to hold such information in confidence.
22. Members of the College Community outside of the Office who receive a Disclosure of an incident of Sexual Violence and who receive the Complainant's permission to do so can provide to the Office the name and contact information of the person who made the Disclosure and the date of the Disclosure to them for follow-up support and services.
23. The College respects a Complainant's right to choose whether and how to pursue action related to an incident of Sexual Violence, subject to the provisions set out in the "Confidentiality and Privacy" section of this Policy. In particular, when the College is made aware of an incident of Sexual Violence that poses a risk to the health and safety of Member(s) of the College Community, the College will take steps to maintain their health and safety.
24. The College will make support and services, including counselling, access or referrals to medical services, and academic and other accommodations, available to Members of the College Community who Disclose having been affected by an incident of Sexual Violence. Support services will also be made available to Members of the College Community who are Respondents.
25. Persons affected by an incident of Sexual Violence should contact the Office to obtain such support and services. A Complainant is not required to make a Report about an incident of Sexual Violence in order to obtain the support and services or accommodations referred to in this Policy. The Office will make support staff available by phone or email on a 24/7 basis. These staff members can provide guidance and support to a Complainant through the process of Disclosure and/or Reporting.
26. The Office can, on a confidential basis, consult or seek the assistance of other internal personnel or resources of the College to facilitate the safety, follow-up, and support of those involved in a Disclosure of Sexual Violence.

SECTION VIII: REPORTING

27. The Office is responsible for receiving Reports of incidents of Sexual Violence involving a Member of the College Community in a non-emergency situation. A Report can also be made at a later date following the incident. Reporting can be initiated in person, by phone, or online.

28. A Complainant can also request that the Office staff file a Report on their behalf. The Office will maintain a confidential database of Reports received. The College has the jurisdiction to investigate Reports of Sexual Violence made against a Member of the College Community under this Policy. The College does not have the jurisdiction to address allegations made against a person who is not a Member of the College Community. However, in the event of such allegations, the College will provide support to Complainants who are Members of the College Community and may be able to take measures such as restricting access to campus by the person against whom allegations are made.
29. In an emergency, 911 should be the first point of contact.
30. A Complainant is not precluded from reporting an Incident of Sexual Violence to municipal police services if they have reported the incident to the College. A Complainant is not precluded from reporting an incident of Sexual Violence to the College if they have reported the incident to municipal police services. A Complainant may choose to Report to one or the other, to neither or to both.
31. Once a Complainant has made a report of an incident of Sexual Violence to the Office, the Complainant has initiated the College's reporting process. The intention of this Policy is for the reporting process and each of its steps to be completed as expeditiously as practicable.
32. Both the Complainant and the Respondent have the right to be accompanied by a support person and/or legal representative at any point during the reporting process and subsequent processes under this Policy. The support person and/or legal representative, whether or not Members of the College Community, are expected to adhere to the provisions outlined in the "Confidentiality and Privacy" section of this Policy.
33. Confidentiality requirements may change once the Complainant or the College decides to report under this Policy. In addition to the provisions outlined in the "Confidentiality and Privacy" section of this Policy, all Members of the College Community who are involved in receiving a report of an incident of Sexual Violence or who are involved in addressing or investigating it should treat the matter as discreetly and confidentially as practicable, within the context of their roles in implementing this Policy.
34. Information will only be shared to the extent necessary to carry out responsibilities under this Policy or as required to provide a fair process during the investigation and decision-making process.
35. The College will take reasonable steps to protect Complainants and others who participate in a College process that is addressing allegations of Sexual Violence from retaliation, including: advising individuals in writing of their duty to refrain from committing an act of reprisal, and sanctioning individuals for a breach of that duty. The College may also address the potential for reprisals by providing an accommodation appropriate in the circumstances.
36. Threats of or acts of retaliation will be treated as incidents of Sexual Violence.

SECTION IX: COLLEGE RESPONSE

37. When the Office receives a Report of an incident of Sexual Violence, it will take steps to engage as soon as practicable in an intake discussion with the Complainant.

38. At the intake discussion, the Office will provide assistance to the Complainant and will discuss with the Complainant the potential available options. The Office will outline information about available support and services, including information about accommodations, interim conditions and interim measures that may be available to address the immediate situation.
39. The Office can, on a confidential basis, consult or seek the assistance of other internal personnel or resources of the College for direction, and can consult or seek the assistance of external parties relevant to the particular incident being reported.
40. Some of the options that may be made available to the Complainant at the first point of contact following a report include, but are not limited to:
 - a. Referral to contacts for suitable support, services or resources available within and outside the College and in the municipality. Information about external community services is available below:

For Toronto residents: The Toronto Rape Crisis Centre

Website: www.trccmwar.ca; 24hr Crisis Line: 416-597-8808

Office: 416-597-1171

For Peel residents: Hope 24/7: Sexual Assault Centre of Peel

Website: www.hope247.ca; 24hr Crisis Line: 1-800-810-0180

Office: 905-792-0821

For York residents: Women's Support Network of York Region

Website: www.womensupportnetwork.ca

24hr Crisis Line: 905-895-7313 or 1-800-263-6734

Office: 905-895-3646

- b. Where appropriate, communication with the person said to have engaged in Sexual Violence to inform them that the conduct is unwelcome and to note the no-retaliation provisions of this Policy;
- c. Availability of academic accommodation and interim conditions and interim measures, including those provided for under and in accordance with other College policies such as the Code of Student Conduct or employment contracts. Examples of such measures for students include: separation of the parties, exam or assignment deferral, class and/or schedule changes. Examples of such measures for employees include: making changes that are not disciplinary but precautionary to avoid contact between parties.
- d. Information about the investigation and decision-making processes that may occur, depending on the role of the Respondent within the College community.

41. The Office will be responsible for coordinating the implementation of accommodations, interim conditions and interim measures as expeditiously as practicable, including referrals as appropriate for the purposes of addressing any non-compliance.

SECTION X: ASSESSMENT AND APPOINTMENT OF AN INVESTIGATOR

42. The Office receives complaints and reviews disclosures submitted. Also, the assessment and investigation processes will be coordinated through the Office.
43. Upon receipt or completion of a written report, the members of the Office will meet to assess the report to determine whether the matter falls within the scope of the Policy on Sexual Violence and Sexual Harassment.
44. If it is determined that the matter falls within the scope of this Policy, the Office will decide whether to commence an investigation.
45. The Complainant can choose not to request an investigation by the College and has the right not to participate in any investigation that may occur. Where a choice not to participate in an investigation is made, the Complainant will be advised that this may affect the nature of the investigation and the ability to draw conclusions from any investigation report.
46. If the Office makes the determination that the Report does not appear to fall within the scope of this Policy, or decides not to commence an investigation, the Office will notify the Complainant of this determination. The Office will also determine whether or not to disclose the fact that allegations were made and any other information to the Respondent.
47. If there is a determination that a Report will not be investigated, the Complainant may seek a review of that decision by making a request in writing within 14 days of the decision to the President of the college or designate who will review the matter and advise the Complainant of their decision in writing.

SECTION XI: APPOINTMENT OF AN INVESTIGATOR

48. Once a determination has been made to commence an investigation, a competent person with the appropriate skills, training and/or experience will be appointed to conduct the investigation. The investigator will either be someone who is a Member of the College Community or a person who is external to the College, as appropriate to the circumstances.
49. The Office will send written notice to the Respondent that an investigation of a Report of Sexual Violence under this Policy is being initiated and provide the name of the investigator. This notice will include the particulars of the incident Reported and indicate that the Respondent will have opportunities to respond to the allegations. The notice will indicate that the Respondent has the right to seek legal advice and to bring a support person, including an association representative, or legal counsel, to any meetings during the investigation.

SECTION XII: INVESTIGATION

50. The investigation must be completed in a timely manner, taking into consideration the circumstances of the particular matter including its complexity and the requirements of fairness and due process.

51. The investigator will provide the Respondent with a reasonable opportunity to respond in writing and/or orally to the allegations. If the response is oral, the investigator should normally confirm the content of the response with the Respondent in writing. If the Respondent does not respond within a reasonable timeframe set by the investigator, or chooses not to participate in the investigation, the investigator may proceed in the absence of their response.
52. The investigator will provide the written particulars of the response from the Respondent, if received, to the Complainant. The Complainant may submit a reply to the response within a reasonable timeframe set by the investigator.
53. If no written reply is received within the time the Policy on Sexual Violence and Sexual Harassment requested, the investigator can proceed in the absence of a reply.
54. The investigator will provide the written particulars of the reply from the Complainant, if received, to the Respondent.
55. The Complainant and Respondent may choose to submit any additional information to the investigator, including the names of any potential witnesses.
56. The investigator may choose to conduct interviews with either or all parties at any time during the investigative process at the investigator's discretion or at the request of a party. The investigator may also choose to seek witness information.
57. The investigator will act in a timely, fair, impartial, and professional manner. The investigator will treat the information gathered during the investigation in a confidential manner in accordance with the requirements of this Policy.
58. The investigator will remind individuals contacted of the provisions outlined in the "Confidentiality and Privacy" section of this Policy and keep confidential the personal information of the people contacted.
59. Following the completion of the investigation, the investigator will provide to the Office a written confidential report containing a summary of the information gathered during the investigation and the findings of fact made based on the balance of probabilities.
60. The Office will inform the Complainant and the Respondent (and/or their designated representatives) in writing of the results of the investigation, with a reminder as to the provisions outlined in the "Confidentiality and Privacy" section of this Policy.

SECTION XIII: DECISION-MAKING AND APPEAL PROCESS

61. In the case of a student Respondent, the investigation report will be reviewed by the President or designate and the Office to determine the appropriate penalty or remedies.
62. Appeals against the decision of the Office may be made to the President of the College.
63. In the case of a staff member Respondent (including Instructors), the investigation report will be reviewed by the President of the College who will determine whether workplace violence and/or Sexual Violence occurred and, if so, the appropriate sanctions or discipline and corrective action, having regard to appropriate factors such as the nature of the offence and any mitigating or aggravating circumstances. The Respondent will be notified in writing of the decision and any discipline or sanction imposed. A determination that a Member of the College Community has

committed an act of Sexual Violence may result in a number of other possible outcomes, including the imposition of education and training, corrective action such as relocation or change of duties or supervision, reprimand, suspension, termination or expulsion, commensurate with the nature of the incident complained of and taking into account all other relevant considerations and in accordance with the applicable College policies and procedures, employment contract or Memorandum of Agreement.

64. If the Respondent's relationship with the College ends and that person is no longer a Member of the College Community, the College may choose to suspend the processes under this Policy. If the Respondent becomes a Member of the College Community again, the College can reinstate the process with notice to the Complainant and Respondent. A leave of absence or any other temporary break from the College does not constitute the end of a relationship with the College for the purposes of this Policy.

SECTION XIV: COLLEGE'S OBLIGATION WHEN A COMPLAINANT REQUESTS NO INVESTIGATION OR CHOOSES NOT TO PARTICIPATE

65. The Complainant can choose not to request an investigation by the College and has the right not to participate in any investigation that may occur.
66. If a Complainant requests that the College not investigate or act on their Disclosure or Report of an Incident of Sexual Violence, the College will consider that person's request but may decide to proceed, having regard to the health and safety of Members of the College Community and its obligations and responsibilities. In such cases, the Complainant has a right to choose not to participate in such an investigation.
67. The Complainant is entitled to receive other support outlined in this Policy regardless of whether they decide to request an investigation or choose not to participate in one.
68. If requested by the Complainant and subject to any applicable legal obligations and access to information and privacy legislation, the Complainant will be informed of the outcome of such an investigation.

SECTION XV: COLLEGE'S OBLIGATION WHEN SOMEONE OTHER THAN THE COMPLAINANT MAKES A REPORT OR A REPORT IS MADE ANONYMOUSLY

69. An allegation of Sexual Violence made by someone other than the Complainant can also be Reported to the College. However, the College's ability to address the allegation will depend on a number of factors regarding the information available and the Complainant's decision respecting whether or not to participate in a College process. Such factors may also include information available to substantiate the allegation and to permit a fair process.
70. In such circumstances, the College will make a determination under the section of this Policy entitled "Assessment and Appointment of an Investigator."

SECTION XVI: REVIEW

71. The College recognizes that appropriately addressing Sexual Violence on campus is an evolving issue and that the College will revisit this Policy and its associated resources and other related and existing College policies on a regular basis.

72. The College will conduct a review of this Policy every three years that will include consultation with Members of the College Community including students and staff, and will amend the Policy as appropriate.

APPENDIX: REFERENCES TO OTHER POLICIES AND LEGISLATION

- i. Selected Relevant Legislation:
- ii. Ontario Bill 132,
- iii. Ontario Regulation 131/16: Sexual Violence at Colleges and Universities
- iv. Freedom of Information and Protection of Privacy Act (FIPPA)
- v. Ontario Human Rights Code
- vi. Criminal Code of Canada

This policy is adapted from the University of Toronto Policy on Sexual Violence and Sexual Harassment, January 2020.

Student/Staff Review:

I have read this policy in its entirety and I fully understand it. If I have any concerns with this policy, I know to contact the college Administrator and/or the College President.

PRINT NAME IN FULL

SIGNATURE

DATE