



Word of Life[®]
Bible Institute

Title IX Policy

2023–2024

TITLE IX POLICY

Word of Life Bible Institute is committed to providing a safe environment free from discrimination. We believe that all people are created in the image of God and are equal. With this in mind, the Bible Institute does not discriminate on the basis of sex in our education programs or activities, including recruitment, admissions, distribution of financial assistance, hiring practices, employment or promotion. This echoes Title IX of the Education Amendments of 1972, which states, "No person in the United States shall, on the basis of sex, be excluded from participation in, or be denied the benefits of, or be subject to discrimination under any education program or any activity receiving Federal financial assistance." The Bible Institute is required to comply with Title IX and the U.S. Department of Education's implementing regulations.

The following seeks to clearly define terms and set forth policies to educate our campus community and help ensure that our campus remains a safe environment for all to learn and grow in their walk with the Lord. The Bible Institute has designated the following individuals to coordinate our efforts in this area:

Mr. Justin Lough

Title IX Coordinator and Institutional Effectiveness Coordinator

4230 Glendale Rd, Page Center for Student Success

518.494.1478 / jplough@wordoflife.edu

Mr. Ethan Morin

Title IX Investigator and Assistant Camp Director at the Pines

4230 Glendale Road, Ministries Center

518.494.1321 / ermorin@wol.org

Ms. Samuelle Champion

Title IX Investigator and Operations General Manager

4230 Glendale Rd, Welcome Center

518.494.1578 / samuellchampion@wordoflife.edu

Questions regarding Title IX may be referred to the Title IX Coordinator and/or to the Assistant Secretary for Civil Rights of the U.S. Department of Education Office of Civil Rights.

A. Definitions

- . **Title IX Coordinator:** An employee of the school designated to ensure compliance with Title IX regulations and investigate all allegations of sex discrimination.
- . **Sex Discrimination:** Discrimination in education programs or activities, including employment, admission, and/or participation in sports or school organizations on the basis of one's sex.
- . **Sexual Harassment:** Conduct on the basis of sex that satisfies one or more of the following:
 1. An employee of the school conditioning the provision of an aid, benefit, or service of the school on an individual's participation in unwelcome sexual conduct (quid pro quo harassment);
 2. Unwelcome conduct determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the school's education program or activity; or
 3. Sexual assault, dating violence, domestic violence, or stalking (as defined below).
- . **Sexual Assault:** Any sexual act directed against another person, without consent of the victim, including instances where the victim is incapable of giving consent, that meets the definition of rape, fondling, incest and statutory rape.
- . **Rape:** the penetration, no matter how slight, of the vagina or anus, with any body part or object, or oral penetration by a sex organ of another person, without the consent of the victim.
- . **Fondling:** the touching of the private body parts of another person for the purpose of sexual gratification, without the consent of the victim, including instances where the victim is incapable of giving consent because of his/her age or because of his/her temporary or permanent mental incapacity.
- . **Incest:** sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by law.
- . **Statutory Rape:** sexual intercourse with a person who is under the statutory age of consent.
- . **Dating Violence:** Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based on the complainant's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. For purposes of this definition, dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse, and dating violence does not include acts covered under the definition of domestic violence.
- . **Domestic Violence:** A felony or misdemeanor crime of violence committed: (1) by a current or former spouse or intimate partner of the victim; (2) by a person with whom the victim shares a child in common; (3) by a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner; (4) by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction in which the crime of violence occurred; or (5) 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.
- . **Stalking:** Engaging in a course of conduct directed at a specific person that would cause a reasonable person to: fear for the person's safety or the safety of others or suffer substantial emotional distress. For the purposes of this definition, course of conduct means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly, or through third parties, by any action, method, device, or means, follows monitors, observes, or surveils, threatens, or communicates to or about a person, or interferes with a person's property; and reasonable person means a reasonable person under similar circumstances and with similar identities to the victim.
- . **Sexual Violence:** Incidents of sexual assault, dating violence, domestic violence, and stalking.
Consent: All school standards prohibit sexual activity outside of marriage. In addition, sexual activity requires consent from both parties involved as a matter of state and federal law. Consent must be voluntary, clear and unambiguous between both parties. Consent cannot be obtained from someone who is a minor, asleep, unconscious or otherwise mentally or physically incapacitated. Consent cannot be given under coercion, threat, or force.

- **Education Program or Activity:** Includes locations, events, or circumstances over which the Bible Institute exercised substantial control over both the respondent and the context in which the sexual harassment occurs, and also includes any building owned or controlled by a student organization that is officially recognized by the Bible Institute.
- **Complainant:** An individual(s) who is alleged to be the victim of conduct that could constitute sexual harassment or sex discrimination.
- **Respondent:** Any individual(s) who has been reported to be the perpetrator of conduct that could constitute sexual harassment.

B. Confidentiality

Individuals who wish to submit a confidential report of sex-based discrimination or sexual harassment, which does not include the complainant's name, should know that this may limit the Bible Institute's ability to fully resolve the complaint. Except as necessary to investigate and resolve complaints of sex discrimination or formal complaints of sexual harassment, the Bible Institute will keep confidential the identity of any individual who has made a report or complaint of sex discrimination, any individual who has made a report or filed a formal complaint of sexual harassment, any complainant, any individual who has been reported to be the perpetrator of sex discrimination, any respondent, and any witness. Reports of sexual violence will be included in the Bible Institute's crime statistics but will not include the names of the parties involved. See Section X.F of the Annual Security Report for further information.

The outcome of an investigation involving students is part of the education record of the student parties involved and is protected from release to the public under the federal law, FERPA, with some exceptions. The Bible Institute may release publicly the name, the violation committed and the sanction imposed for any respondent who is found to have violated a Bible Institute policy by committing sexual assault or a "crime of violence," including: arson, burglary, robbery, criminal homicide, assault, destruction/damage/vandalism of property and kidnapping/abduction.

Complainants should know that the Bible Institute will take necessary measures to protect the complainant from retaliation on the basis of making a complaint and will put measures in place to allow the complainant to continue to work or study in a safe and supportive environment without the threat of retaliation or further discrimination or harassment. A formal complaint will be handled with the utmost of care and will allow the Bible Institute to completely investigate the complaint and issue sanctions against the respondent if a violation of this policy is found.

C. Discrimination and Sexual Harassment Grievance Procedure

Reporting sex discrimination or sexual harassment: If an individual believes that they have been denied admission, employment, or participation in a school program, activity or sport based on his/her sex or has experienced sexual harassment as defined above, he/she should contact the Title IX Coordinator immediately. Any victims of sexual violence should get to a safe place and seek medical attention immediately to ensure their personal safety and to help aid any future investigations. Preserving evidence when a crime of sexual violence occurs may assist in proving that the alleged criminal offense occurred or may be helpful in obtaining a protection order. Complainants should not hesitate to contact a member of the school's Student Life Department or the Title IX Coordinator to report the incident, regardless of the circumstances. Any person (employees or students) may report sex discrimination or sexual harassment (even if the reporting person is not the alleged victim) to the Title IX Coordinator in person, by mail, by telephone, or by electronic mail using the contact information provided above.

- **Initial Contact with Complainant:** The Title IX Coordinator will promptly contact the complainant to discuss the availability of supportive measures (see below), consider the complainant's wishes with respect to supportive measures, inform the complainant of the availability of supportive measures with or without the filing of a formal complaint, explain the process for filing a formal complaint of sexual harassment, and describe the grievance process for either sex discrimination or sexual harassment (as appropriate). The complainant will be provided with a copy of the Title IX policy.

- **Information for Victims of Sexual Violence:** If the complainant (student or employee) is reporting an incident of sexual violence, the Title IX Coordinator will also provide a written notification of the available supportive measures, a written notification of resources for victims at the Bible Institute and in the community, a list of rights and options for victims of sexual violence, information about options for involving local law enforcement and campus Security, and options for obtaining a protective order (if relevant). The Title IX Coordinator will offer assistance contacting law enforcement if the complainant desires but will also explain that contacting law enforcement is not required.
- **Mandatory Reporters:** Any Bible Institute official who has the authority to institute corrective measures on behalf of the school must report sexual harassment, including sexual violence to the Title IX Coordinator. The Bible Institute's officials with authority include the Resident Directors, Dean of Men, Dean of Women, Dean of Students Health and Security Coordinator, Executive Dean, Academic Dean, Dean of Ministries, and Executive Vice President. The Bible Institute also encourages all students, staff members, and other members of the school community to report sexual violence to the Title IX Coordinator immediately.
- **Supportive Measures:** Upon receipt of a report of alleged sex discrimination or sexual harassment, Title IX Coordinator is responsible for coordinating the effective implementation of supportive measures with the Student Life, Academic, and Ministries departments, as appropriate. Supportive measures are non-disciplinary, non-punitive individualized services offered as appropriate, as reasonably available, and without fee or charge to the complainant or the respondent before or after the filing of a formal complaint or where no formal complaint has been filed. Such measures are designed to restore or preserve equal access to the Bible Institute's education program or activity without unreasonably burdening the other party, including measures designed to protect the safety of all parties or the Bible Institute's educational environment, or deter sexual harassment. Supportive measures may include counseling, extensions of deadlines or other course-related adjustments, modifications of work or class schedules, campus escort services, mutual restrictions on contact between the parties, changes in work or housing locations, leaves of absence, increased security and monitoring of certain areas of the campus, and other similar measures. The Bible Institute will maintain as confidential any supportive measures provided to the complainant or respondent, to the extent that maintaining such confidentiality would not impair its ability to provide the supportive measures. If a complainant reporting an incident of sexual violence requests a supportive measure, and it is reasonably available, the Bible Institute will provide such measure, regardless of whether the complainant chooses to report the incident to campus police or local law enforcement.
- **Emergency Removal:** In some circumstances, the Bible Institute may suspend a student-respondent from its education programs or activities on an emergency basis based on a report of sexual harassment. Before suspending the respondent, the Bible Institute will conduct an individualized safety and risk analysis to determine if there is an immediate threat to the physical health or safety of any student or other individual arising from the allegations of sexual harassment, which justifies the removal of the respondent. If the Bible Institute makes the decision to temporarily remove the respondent, the Bible Institute will provide the respondent with notice and an opportunity to challenge the decision immediately following the removal. The Dean of Students or Executive Dean will make all decisions regarding emergency removal of students. The Bible Institute has the discretion to place employee-respondents on an administrative leave of absence during the pendency of the grievance procedure.
- **Complaints of Sex Discrimination:** If a complaint of sex discrimination is filed against the Bible Institute or its staff that is not sexual harassment (as defined above), the Bible Institute will provide for the prompt and equitable resolution of the complaint. The Title IX Coordinator will investigate the complaint and report the findings of the investigation to the Executive Vice President for action. The complainant will be notified of the outcome of the complaint and any remedies provided by the Bible Institute to resolve any incidents of sex discrimination.

- Formal Complaints of Sexual Harassment:** A formal complaint of sexual harassment must be filed before the Bible Institute will initiate its grievance process. The formal complaint can either be filed by a complainant or signed by the Title IX Coordinator. The complainant may submit a formal complaint to the Title IX Coordinator in person, by mail, or by electronic mail. Those wishing to file formal complaints are encouraged to complete the Title IX Discrimination Complaint Form available through Canvas and submit the completed form to the Title IX Coordinator. The formal complaint must include the complainant's physical or digital signature, or otherwise indicate that the complainant is the person filing the formal complaint. At the time of filing a formal complaint, the complainant must be participating in or attempting to participate in an education program or activity of the Bible Institute. In cases where the complainant does not choose to file a formal complaint but where the Title IX Coordinator after considering all of the circumstances determines that the Bible Institute must initiate the grievance process to avoid being deliberately indifferent (such as when an individual or other members of the community may be at risk), the Title IX Coordinator may sign the formal complaint. The Bible Institute will not act with deliberate indifference in response to any formal complaint.
- Dismissal of a Formal Complaint:** The Bible Institute must dismiss a formal complaint, if at any time during the investigation or hearing, the Bible Institute determines that (1) the alleged misconduct does not meet the definition of sexual harassment; (2) the alleged misconduct did not occur within the Bible Institute's "education program or activity" (defined above); or (3) the alleged misconduct occurred against a complainant located outside of the United States.

The Bible Institute may also dismiss a formal complaint, if at any time during the investigation or hearing: (1) the complainant notifies the Title IX Coordinator in writing that the complainant would like to withdraw the formal complaint or any allegations therein; (2) the respondent is no longer enrolled at or employed by the Bible Institute; or (3) specific circumstances prevent the Bible Institute from gathering evidence sufficient to reach a determination as to the formal complaint or allegations therein.

The Title IX Coordinator will promptly send written notice of the dismissal and reason(s) therefor simultaneously to the parties (complainant and respondent) and will also notify the complainant of the right to appeal a dismissal. See below for more information on appeals.

- Consolidation of Formal Complaints:** The Bible Institute may 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.

D. Sexual Harassment Grievance Process

This grievance process allows for the prompt and equitable resolution of formal complaints of sexual harassment through either an informal or formal resolution process (both of which are set forth below), and the Bible Institute will respond promptly in a manner that is not deliberately indifferent (i.e., clearly unreasonable in light of the known circumstances). The grievance process includes a presumption that the respondent is not responsible for the alleged conduct until a determination regarding responsibility is made at the conclusion of the grievance process, and the Bible Institute will not impose any disciplinary sanctions against a respondent until a determination of responsibility is made. All decision-makers involved in the grievance process are required to make an objective evaluation of all relevant evidence – including both inculpatory and exculpatory evidence – and credibility determinations may not be based on a person's status as a complainant, respondent, or witness. The Title IX Coordinator, Investigator, and any decision-makers will receive required training on this process and handling allegations of sexual harassment.

- Time Frames for Grievance Process:** The Bible Institute plans to conclude the grievance procedure in a reasonably prompt time frame. Any time frames listed below are subject to change for good cause. Good cause may include considerations such as the absence of a party, a party's advisor, or a witness; concurrent law enforcement activity; or the need for language assistance or accommodation of disabilities. Written notice of any delay or extension and the corresponding reasons will be provided simultaneously to the complainant and the respondent.

- **Notice of Allegations:** After receiving a formal complaint, the Title IX Coordinator will provide a written notice of allegations to the complainant and respondent in advance of the initial interview with the Investigator to give the parties sufficient time to prepare. The notice of allegations will include: 1) notification of the grievance process as well as the availability of an informal resolution; 2) a list of the allegations of misconduct, including sufficient details known at the time such as the identities of the parties involved in the incident, the conduct allegedly constituting sexual harassment, and the date and location of the alleged incident; 3) a statement that the respondent is presumed not responsible for the alleged conduct and that a determination regarding responsibility is made at the conclusion of the grievance process; 4) notification that the parties may have an advisor of their choice, who may be, but is not required to be, an attorney; 5) notification that the parties may inspect and review evidence; and 6) the provision in the Bible Institute's code of conduct that prohibits knowingly making false statements or knowingly submitting false information during the grievance process. If in the course of an investigation, the Bible Institute decides to investigate allegations about the complainant or respondent that are not included in the original notice of allegations, the Title IX Coordinator must provide notice of the additional allegations to the parties.
- **Informal Resolution:** An informal resolution process may be applied to resolve a formal complaint, except when the complainant is a student, and the alleged respondent is an employee. To initiate the informal resolution process, the Title IX Coordinator will review the process with the complainant and the respondent in a timely manner and elicit their interest in engaging this process. Each party must receive written notice disclosing: (1) the allegations; (2) the requirements of the informal resolution process including the circumstances under which it precludes the parties from resuming a formal complaint arising from the same allegations; (3) that at any time prior to agreeing to a resolution, any party has the right to withdraw from the informal resolution process and resume the grievance process with respect to the formal complaint; and (4) any consequences resulting from participating in the informal resolution process, including the records that will be maintained or could be shared. Both parties must give voluntary, informed written consent to participate in the informal resolution process. To reach an informal resolution, the Title IX Coordinator (or designee) will speak with both parties and any appropriate witnesses to explore what actions and supportive measures can be agreed upon. If a satisfactory resolution is reached through this informal conversation, the resolution will be documented and signed by both parties. If both parties sign the resolution, they may not then pursue the formal resolution process, which includes the investigation, hearing, and appeals processes described below.

If these efforts are unsuccessful or if the complainant or respondent do not accept the informal resolution, the formal resolution process may commence. Either party (complainant or respondent) may stop the informal process at any time and request that the complaint be handled through the formal process. The complainant may request to end the informal or formal process at any time prior to a determination.

- **Investigation:** One of the Title IX Investigators will conduct the investigation on behalf of the Bible Institute. The burden of proof and the burden of gathering evidence sufficient to reach a determination regarding responsibility rest on the Bible Institute and not on the parties. However, both parties must have the opportunity to present witnesses, including fact and expert witnesses, and other inculpatory and exculpatory evidence to the Investigator. The Investigator 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 which are made and maintained in connection with the provision of treatment to the party, unless the Investigator obtains that party's voluntary, written consent to do so for the grievance process.
- **Sharing of Evidence:** During the investigation, the complainant and respondent will be provided with copies of or allowed to inspect all evidence collected. Either party may submit responses to the evidence to the Investigator or may submit any additional evidence contradicting or corroborating the evidence collected by the Investigator.
- **Preliminary Investigative Report:** The Investigator will prepare an investigative report that fairly summarizes the relevant evidence. At the conclusion of the investigation, the Investigator will provide the complainant and respondent and their advisors with a copy of the preliminary investigative report allowing a 10-day response period for both parties to review and respond to the report.

- **Final Investigative Report:** Once this 10-day response period is concluded, the investigator will review any responses received and finalize the report. The complainant, the respondent and their advisors will simultaneously receive a copy of this written report at least 10 days in advance of the scheduled hearing.
- **Advisors:** Both the complainant and the respondent have the right to have an advisor present during all phases of the investigation and hearing. The advisor can be, but is not required to be, an attorney. If a party does not have an advisor for the live hearing, the Bible Institute will appoint an advisor of its choice without fee or charge to that party, who may be, but is not required to be, an attorney, to represent the party during the hearing.
- **Police Investigations:** The Investigator will investigate the complaint independent of any external law enforcement investigations that may be ongoing. Investigators may need to postpone the investigation until law enforcement has concluded the evidence gathering portion of their investigation but will resume the investigation as quickly as possible.
- **Written Notice of Hearing:** The Title IX Coordinator and the Investigator will provide written notification of the date, time, location, participants, allegations and purpose of the hearing, to all parties and witnesses whose participation is invited or expected within 10 days of the hearing to provide sufficient time to prepare to participate.
- **Decision-maker:** If the respondent is a student, the Dean of Students will serve as the decision-maker for the hearing if the respondent is an employee, the Human Resources Manager will serve as the decision-maker. The role of the decision-maker will be to oversee the resolution of the complaint by interviewing all appropriate parties, including witnesses, determining the relevance of all questions posed under cross-examination, evaluating the relevance of all evidence submitted and rendering a decision of responsibility.
- **Hearing Format:** The live hearing will be conducted in a manner so that all parties can see and hear testimony at all times. During the hearing, the parties may be in separate rooms (at the request of either party) or the hearing (in-part or in-whole) may be conducted virtually as long as there is appropriate technology to allow for the parties, their advisors, and the decision-maker to see and hear testimony at all times. The hearing will be recorded or transcribed, and a copy of the recording/transcription will be provided to both the complainant and respondent for review.
- **Rules for Questioning Parties and Witnesses:** Only the advisors for the parties or the decision-maker may question the testifying parties and witnesses, but the advisors must be allowed to question each testifying person directly, orally, and in real time. All questioning must be conducted in a professional and polite manner. Questioners may only ask relevant questions. Before the party or witness answers a question, the decision-maker must first determine whether the question is relevant and explain any decision to exclude a question as not relevant. Questions and evidence about the complainant's sexual predisposition or prior sexual behavior are not relevant, unless such questions and evidence are offered to prove that someone other than the respondent committed the conduct alleged by the complainant, or if the questions and evidence concern specific incidents of the complainant's prior sexual behavior with respect to the respondent and are offered to prove consent. The decision-maker may not require, allow, rely upon, or otherwise use questions or evidence that constitute, or seek disclosure of, information protected under a legally recognized privilege, unless the person holding such privilege has waived the privilege.
- **Impact of Testimony:** If a party or witness does not submit to cross-examination at the live hearing, the decision-maker must not rely on any statement of that party or witness in reaching a determination regarding responsibility (including a statement made to the investigator during the investigation). The decision-maker cannot draw an inference about the determination regarding responsibility based solely on a party's or witness's absence from the live hearing or refusal to answer cross-examination or other questions.
- **Standard of Evidence:** The decision-maker will use the preponderance of evidence standard in determining responsibility for formal complaints involving students or employees, which means the decisionmaker must determine whether there is evidence to indicate a policy violation is more than 50% likely.

- Determination Regarding Responsibility:** After the hearing, the decision-maker will issue a written determination regarding responsibility applying the preponderance of the evidence standard which will be provide simultaneously to the complainant and respondent. The written determination will include: (1) a list of the allegations potentially constituting sexual harassment; (2) a description of the procedural steps taken from the receipt of the formal complaint through the determination, including any notifications to the parties, interviews with parties and witnesses, site visits, methods used to gather other evidence, and hearings held; (3) findings of fact supporting the determination; (4) conclusions regarding the application of the Bible Institute's policies or codes of conduct to the facts; (5) a statement of, and rationale for, the result as to each allegation, including a determination regarding responsibility; (6) any disciplinary sanctions imposed on the respondent; (7) any remedies designed to restore or preserve equal access to the Bible Institute's education program or activity that will be provided to the complainant; and (8) the procedures and permissible bases for the complainant and respondent to appeal. The determination regarding responsibility becomes final either on the date that the parties receive the result of the appeal, if an appeal is filed, or if an appeal is not filed, the date on which an appeal would no longer be considered timely.
- Remedies and Sanctions:** If the respondent is found to be responsible for the alleged sexual harassment, the decision-maker will provide remedies to the complainant designed to restore or preserve equal access to the Bible Institute's education programs or activities and impose disciplinary sanctions on the respondent. Remedies may include the supportive measures discussed above but need not be non-disciplinary or non-punitive and need not avoid burdening the respondent. Potential sanctions for student-respondents include camping, work duties, counseling, suspension, or dismissal. Potential sanctions for employee-respondents include warning, leave of absence, termination.
- Appeals:** Both parties involved have the right to appeal the determination regarding responsibility or the dismissal of a formal complaint. Appropriate measures will be taken during the appeal process to ensure an environment free of sexual discrimination and retaliation. Notice of intent to appeal must be submitted within 15 days of the written notification of the determination or dismissal, and will be based on one of the following grounds:

 1. Procedural irregularity that affected the outcome of the matter.
 2. New evidence, which was not reasonably available at the time the determination regarding responsibility or dismissal was made that could affect the outcome of the matter.
 3. The Title IX Coordinator, Investigator(s), or decision-maker(s) had a conflict of interest or bias for or against complainants or respondents generally or the individual complainant or respondent that affected the outcome of the matter.
 4. The sanction does not seem to match the infraction.

Both parties will be notified of the notice of intent to file an appeal and the appeal procedures by the Title IX Coordinator. Both parties may submit a written statement in response to the appeal within 10 days of receipt of the notice of appeal. The Executive Vice President will consider the related documents, (such as the investigative report, hearing transcript, determination of responsibility, and prior disciplinary records) but will not consider information that is not relevant, including information about the prior sexual history of the complainant. The Executive Vice President will issue a written decision describing the result of the appeal, the rationale for the result, and the grounds on which the appeal was granted. The decision of the Executive Vice President is final and will be issued simultaneously to both the complainant and the respondent typically within 10 business days of the deadline by which the parties must submit their written statements, absent extenuating circumstances.

E. Other Related Misconduct

Word of Life Bible Institute takes the safety of its students, employees, and all members of its school community seriously and desires to create an environment where all feel free and safe to report issues in regard to any form of sex discrimination or sexual harassment. As such, the school reserves the right to extend grace to complainants and witnesses of alleged sex discrimination or sexual harassment in the form of mitigation or avoidance of discipline regarding the use of alcohol or drugs or engaging in consensual sexual activity, provided that the individuals are acting in good faith as complainants or witnesses.

F. Retaliation; False Complaints

Title IX prohibits institutions or other persons from intimidating, threatening, coercing, or discriminating against any individual for the purpose of interfering with any right or privilege secured by Title IX or because the individual has made a report or complaint, testified, assisted, or participated or refused to participate in any manner in an investigation, proceeding, or hearing required by the Title IX regulations. Institutions are also prohibited from bringing charges against an individual for code of conduct violations that do not involve sex discrimination or sexual harassment, but arise out of the same facts or circumstances as a report or complaint of sex discrimination or a report or formal complaint of sexual harassment, for the purpose of interfering with any right or privilege secured by Title IX.

Word of Life Bible Institute prohibits retaliation against anyone for having raised a complaint under this policy in good faith or for cooperating with an investigation of a complaint. Any instances of retaliation should be reported to the Title IX Coordinator immediately and may result in disciplinary sanctions independent of other sanctions already implemented under the policy. Fabricated complaints alleging a violation of this policy will be subject to disciplinary action.

G. Programs to Prevent Dating Violence, Domestic Violence, Sexual Assault, and Stalking.

Sexual violence, which includes sexual assault, dating violence, domestic violence, and stalking, is prohibited by Title IX and by the Bible Institute's policies. See Section A. for the definitions of these terms. The Title IX Policy describes the procedures for reporting and responding to sexual harassment and sexual violence. As is further described in the Title IX Policy, the Bible Institute prohibits retaliation against students for bringing complaints of sexual harassment and sexual violence and makes every effort to keep such complaints confidential.

The Bible Institute provides primary prevention programs on sexual violence to incoming students via a required comprehensive oral and visual presentation on the issue by the Title IX Coordinator as part of the Opening Weekend schedule, and to new employees as part of their employee orientation. The oral and visual presentation given by the Title IX Coordinator during Opening Weekend is required for all students (not just incoming students) as part of the Bible Institute's ongoing efforts to provide students with sexual violence prevention and awareness training. The Bible Institute provides ongoing prevention and awareness training about sexual violence to all employees during the annual fall Staff Advance meeting, which is required for all staff members. Prevention training materials and information are distributed to all students and staff via electronic mail at the beginning of each semester, at a minimum. Additionally, all students participate in related child protection/sexual violence and misconduct prevention training before working at any of Word of Life's camps (approximately twice annually). Both primary and ongoing prevention training includes the following topics:

- A statement that the institution prohibits crimes of sexual violence;
- The definitions of dating violence, domestic violence, sexual assault, and stalking in this policy and in the applicable jurisdiction;
- A description of safe and positive options for bystander intervention (see below);
- Information on risk reduction (see below);
- The procedures for reporting sexual violence, including who to contact and options for confidential reporting;
- The Title IX grievance procedure for resolving formal complaints, including potential sanctions;
- The importance of preserving evidence;
- Options for involving law enforcement and obtaining protective orders;
- A description of existing on- and off-campus counseling, mental health, or other victim resources;
- A description of supportive measures available to complainants and respondents; and
- The statement of complainant's rights and options.

Bystander intervention means safe and positive options that may be carried out by an individual or individuals to prevent harm or intervene when there is a risk of sexual violence. Bystander intervention includes recognizing

situations of potential harm, understanding institutional structures and cultural conditions that facilitate violence, overcoming barriers to intervening, identifying safe and effective intervention options, and taking action to intervene.

Risk reduction means options designed to decrease perpetration and bystander inaction and to increase empowerment for victims in order to promote safety and to help individuals and communities address conditions that facilitate violence.

H. Protecting the Confidentiality of Victims and Other Necessary Parties

Reports of sexual violence (which includes domestic violence, dating violence, sexual assault, and stalking) should be made to the Title IX Coordinator. See Section C. All initial reports will be kept confidential to the extent possible. If the complainant decides to move forward with a formal complaint, the identities of parties and witnesses as well as the details of the incident will be kept confidential, except as necessary to investigate and resolve the formal complaint. Please see Section B. for further information on confidentiality in the grievance procedure. Complainants should know that the Bible Institute will take necessary measures to protect the complainant from retaliation on the basis of making a complaint. See Section F.

I. Confidentiality of any Supportive Measures Provided to the Victim

The supportive measures that the Bible Institute may provide to a complainant are described in Section C. The Bible Institute will maintain as confidential any supportive measures provided to the complainant or respondent, to the extent that maintaining such confidentiality would not impair its ability to provide the supportive measures.

J. Written Notification to Students and Employees About Existing Services for Complainants of Sexual Violence

The Title IX Coordinator will provide written notification to a complainant (student or employees) who reports an incident of sexual violence, which will include any available resources at the campus or in the local community related to counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid, and other services available for victims, both within the institution and in the community

Students are advised of the Biblical Counseling Center during the beginning of the year orientation at the Bible Institute and are advised to visit the Health and Security Department where we have information listing local medical offices, or we suggest the students contact the Health and Security Coordinator or Medical Director for information of finding additional resources for mental health and counseling.

The mission of the Center for Biblical Counseling is to provide a private and safe place for students and staff to help them sort out personal struggles and make godly decisions in the midst of those struggles in order to enhance their spiritual growth. This is available to all students at no cost. Biblical Counseling is the process where the Bible, God's Word, is related individually to a person or persons who are struggling under the weight of personal sin and/or the difficulties with suffering, so that he or she might genuinely change in the inner person to be pleasing to God.

K. Written Notification to Victims About Supportive Measures

As described in Section C. under the heading Supportive Measures, the Title IX Coordinator will discuss the availability of supportive measures with a complainant and provide the complainant with a written notification of the available supportive measures. If a complainant reporting an incident of sexual violence requests a supportive measure, and it is reasonably available, the Bible Institute will provide such measure, regardless of whether the complainant chooses to report the incident to campus police or local law enforcement.

L. Written Notification to Victims of Sexual Violence of Rights and Options

As described in Section C. under the heading, the Title IX Coordinator will provide the complainant reporting an incident of sexual violence with a written notification of his/her rights and options.

Statement of Complainant Rights and Options

Complainants have the following rights:

1. To receive information about the importance of preserving evidence, how to report an offense, and the Title IX grievance procedure for addressing complaints.
2. To make decisions affecting their medical and emotional treatment and whether they choose to file a formal complaint.
3. To have control over making decisions about whether to cooperate with law enforcement.
4. To receive information about the availability of protective orders.
5. To be notified in advance of the date, time, and location of any investigative meetings and/or hearings in order to effectively prepare.
6. To review and comment on all evidence that will be considered in the investigation and decision-making process if a formal complaint is filed.
7. To receive written notification of supportive measures available from the Bible Institute.
8. To receive written notification of resources for victims available at the Bible Institute and in the community.
9. To be assured of confidentiality by the Bible Institute to the extent possible and consistent with procedures outlined in this policy.
10. To have an advisor of their choice, including legal counsel, during any Title IX investigation, hearing, or appeal proceeding.
11. Not to have their prior sexual history discussed during the investigation or hearing unless relevant in determining responsibility or consent.
12. To be informed of the outcome of the informal and formal resolution procedures.
13. To appeal the final determination (on the permitted grounds) or the dismissal of a formal complaint.

M. Procedures for Institutional Disciplinary Action in Cases of Alleged Sexual Violence

Formal complaints of sexual violence, which includes sexual assault, dating violence, domestic violence, and stalking, will be addressed through the Bible Institute's Title IX grievance process through either the informal or formal resolution process. If the respondent is found to be responsible for the alleged sexual violence, the decision-maker will provide remedies to the complainant designed to restore or preserve equal access to the Bible Institute's education programs or activities and impose disciplinary sanctions on the respondent. Potential sanctions for respondents are discussed in Section D. under the subheading Remedies and Sanctions. Student dismissal is discussed further in Section VIII.D of the Annual Security Report.