



Sexual Violence Comprehensive Policy (per 110 ILCS 155/10)

This comprehensive policy will include definitions and components to the abovementioned policy, as adopted by ETI School of Skilled Trades.

ETI School of Skilled Trades defines consent as the following:

“Consent” – is a freely given agreement to sexual activity. A definition of consent that, at a minimum, recognizes that (i) consent is a freely given agreement to sexual activity, (ii) a person's lack of verbal or physical resistance or submission resulting from the use or threat of force does not constitute consent, (iii) a person's manner of dress does not constitute consent, (iv) a person's consent to past sexual activity does not constitute consent to future sexual activity, (v) a person's consent to engage in sexual activity with one person does not constitute consent to engage in sexual activity with another, (vi) a person can withdraw consent at any time, and (vii) a person cannot consent to sexual activity if that person is unable to understand the nature of the activity or give knowing consent due to circumstances, including without limitation the following:

- a) A person is incapacitated due to the use or influence of alcohol and/or drugs.*
 - b) The person is asleep or unconscious.*
 - c) The person is underage; or*
 - d) The person is incapacitated due to a mental disability.*
- 1) If a student chooses to report an alleged violation of the above comprehensive policy, they can contact the Title IX Coordinator for ETI School of Skilled Trades or request a written form that is located at the front desk:
Marianna Caniglia, President
500 Joliet Road, Suite 100, Willowbrook, IL 60527
Phone: 630-216-4957
Email: mcaniglia@eticampus.edu
 - 2) Students are encouraged to report alleged violations to the Title IX coordinator and/or any employee at the school that they feel comfortable speaking with. If a student reports to anyone other than the Title IX coordinator, all employees are directed to immediately report to the Title IX coordinator and keep all information they receive confidential.
 - 3) Students can file an alleged violation of the comprehensive policy via email at mcaniglia@eticampus.edu, confidentially by requesting a written form from the front desk staff and direct third parties to email to Title IX coordinator.

- 4) If an alleged violation is reported, the Title IX coordinator will speak with the survivor, identify and locate witnesses (if any), contact and speak with the respondent, cooperate with local law enforcement and provide all physical evidence collected from the survivor. The school will also offer the survivor the opportunity to preserve physical evidence of sexual violence from a medical provider at no charge to the survivor.
- 5) The survivor will receive a detailed report of all information collected by the Title IX coordinator.
- 6) The nearest facility for a survivor to have a medical forensic examination is **University of Chicago-AdventHealth-Hinsdale, located at 120 N. Oak St, Hinsdale, IL 60521, 630-856-9000**
- 7) Local Sexual Assault Crisis facility is **Pillars Community Health-La Grange, 321 N. La Grange Rd, La Grange, IL 60526, 708-745-5277**. The National Crisis Hotline can be reached at 800-656-4673.
- 8) The survivor will be provided with a detailed description of how the institution of higher education will take protective measures to make the survivor feel safe while at school.
- 9) If a resolution is reached, the survivor will be notified prior to any notifications to other parties involved.
- 10) A student who is found to be in violation of the comprehensive policy may be subject to suspension and/or termination from the higher education institution.
- 11) The Title IX coordinator will provide anonymity to any person that reports an alleged violation of comprehensive policy and will not receive any disciplinary actions for doing so.
- 12) ETI School of Skilled Trades strictly prohibits the behavior of retaliation of those involved and will discipline accordingly.

Student's notification of rights and options: (110 ILCS 155/15)

- 1) Survivors have the right to report or not report any alleged violations of the comprehensive policy. If reported, all information will be confidential.
- 2) Survivors can report the alleged violation to the Title IX Coordinator, **Marianna Caniglia, President – 500 Joliet Road, Suite 100, Willowbrook, IL 60527, Phone 630-216-4957, Email mcaniglia@eticampus.edu**
- 3) Survivors have the right to request and receive assistance from the Title IX coordinator and/or local law enforcement.
- 4) Survivors may request special accommodation to ensure their safety during and after the investigation of the alleged violation. ETI School of Skilled Trades does not provide housing, dining or transportation on campus, however ETI School of Skilled Trades will try to accommodate survivors with any requests made in these areas.
- 5) ETI School of Skilled Trades will provide resources regarding local and mental health services, counseling and advocacy services at the request of the survivor.

- 6) ETI School of Skilled Trades' Title IX coordinator will respond to an alleged violation of the comprehensive policy within 1 hour of the filing of the alleged violation. This will be through verbal communication and sparingly noted in the student's account.

Campus	Title IX Coordinator	Phone	Email	Address
Willowbrook	Marianna Caniglia	630-216-4957	Mcaniglia@eticampus.edu	500 Joliet Rd #100 Willowbrook, IL 60527

Confidential Advisor to Survivors: (110 ILCS 155/20)

- 1) ETI School of Skilled Trades will refer alleged survivors to the above-mentioned local and national crisis centers.
- 2) All Communications with the Confidential Advisors are subject to a privilege outlined in Illinois Civil Code of Procedure (110 ILCS 155/20(d)(4);735 ILCS 5/8-804)

Procedure to resolve complaints: (110 ILCS 155/25)

- 1) The complaint resolution policy will begin promptly and proceed within a timely manner; all allegations will be responded to within 1 hour of submission.
- 2) The Title IX coordinator will attempt to resolve complaints of alleged violations of the comprehensive policy.
- 3) The Title IX coordinator will attend online trainings and webinars on issues of sexual violence, domestic violence, dating violence and stalking and how to conduct the complaint resolution procedure.
- 4) ETI School of Skilled Trades will appoint additional individuals to resolve complaints in the event of a conflict of interest and/or individuals with no prior involvement in the initial determination of findings.
- 5) Title IX coordinators will use a preponderance of evidence to determine if an alleged violation has occurred.
- 6) Both the complainant and the respondent will receive notification of a finding before contact is made between the parties.
- 7) Interim protective measures will be put in place pending the resolution of the complaint.
- 8) The privacy of both parties will be protected.
- 9) Both the complaint and respondent will have an opportunity to provide and/or present evidence and witnesses on their behalf during the complaint resolution process.
- 10) Neither party shall interview each other, however they may provide questions to be asked by those that are involved in the complaint resolution process.
- 11) Both parties will be allowed to select an advisor of their choice throughout the process.
- 12) Both parties have the right to not testify.
- 13) Both parties are entitled to written notification of the results within seven days of the resolution.

14) Both parties have the right to appeal the complaint resolution findings if (1) a procedural error occurred (ii) new information is presented (iii) the sanction is disproportionate to the violation. The appeal will be responded to within 7 days of the submission.

15) The anonymity of both parties will be protected throughout the entire process.

Training students & campus employees: (110 ILCS 155/30(b)-(c))

- 1) ETI School of Skilled Trades will have available on their website www.eticampus.edu; information on consent, retaliation, resources, bystander intervention and risk reduction strategies.
- 2) ETI School of Skilled Trades will work with the local crisis center to schedule training for those who could receive alleged violations of the comprehensive policy.

Regional Task Force: (110 ILCS 12/10(b))

- 1) ETI School of Skilled Trades' task force will consist of local community partners, law enforcement, and campus administrators.

Office of Civil Rights Contact Information

Persons may contact the U.S. Department of Education's Office for Civil Rights, the agency responsible for monitoring and addressing Title IX violations:

Illinois

Denver Office

Office for Civil Rights

Education

U.S. Department of Education

Cesar E. Chavez Memorial Building

1244 Speer Boulevard, Suite 310

Denver, CO 80204-3582

Phone: 303-844-5695

Email: OCR.Denver@ed.gov

National Headquarters

U.S. Department of

Office for Civil Rights

Lyndon Baines Johnson DOE Bldg

400 Maryland Avenue, SW

Washington, DC 20202-1100

Phone: 800-421-3481

Email: OCR@ed.gov

Definitions included in Policy

Advisor – a person chosen by a party or appointed by the institution to accompany the party to meetings related to the resolution process. Available for advisement, and cross examination.

Discrimination – being treated differently and worse based on sex, gender, sexual orientation, or gender identity.

Harassment – Unwelcome conduct based on sex, such as bullying, slurs, or sexually explicit remarks, which are severe, persistent, or pervasive and creates a hostile environment.

Retaliation – Punishing or taking negative action against anyone who opposes discrimination or participates in Title IX investigations.

Sexual Harassment – This can be a one-time or repeated action that meets the definition of harassment, including sexual assault, dating violence, domestic violence, or stalking.

Sexual Misconduct – A broad term that includes sexual harassment, sexual violence and other forms of unwelcome sexual behavior.

Complainant – One who makes a formal complaint.

Consent – permission for something to happen or agreement to do something.

Dating Violence – a form of sex discrimination.

Sexual Assault – any sexual contact or intercourse without consent, including acts of attempted or completed sexual contact or intercourse perpetrated against a person's will or when they are unable to give consent due to factors like incapacitation from drugs or alcohol.

Parties – the complainant and respondent.

Respondent – individual accused of engaging in prohibited conduct.

Formal Complaint – written document filed by a complainant or signed by the Title IX Coordinator that formally alleges sexual harassment or other sexual misconduct within an educational institution's program or activity and requests an investigation. It initiates the formal grievance process, must be signed by the complainant or have the Title IX Coordinator's signature, and states that a Title IX sexual harassment violation is being alleged.

Stalking – course of conduct directed at a specific person that would cause a reasonable person to either fear for their safety or the safety of others or suffer substantial emotional distress.

Supportive Measures – non-disciplinary, non-punitive services intended to restore or preserve a party's equal access to an educational program or activity and protect the safety of all those involved.

Final Determination – a written decision by a school that addresses a formal complaint of sex discrimination, typically resulting from an investigation.