

# **Our Call to Action: Recommendations for Changes to the BC Sexual Violence and Misconduct Policy Act**

Submitted by the Anti-Violence Project to the Ministry of Advanced Education and Skills Training, September 15, 2022



## **About AVP**

Territory acknowledgement: situating ourselves and our work

The Anti-Violence Project would like to express our gratitude to the communities and nations on whose territories we do our work, the Lkwungen and WSÁNEĆ Peoples. As an organization committed to ending sexualized and gender-based violence, we recognize the inherent and deeply rooted connections between colonization and all forms of violence. Recognizing the historical and ongoing violence of colonialism and engaging in anti-colonial action is critical to our work as anti-violence advocates.

Who We Are:

The Anti-Violence Project (AVP) is the student-funded, on campus sexual assault centre housed within the University of Victoria Student Union (UVSS). We provide peer-based support and referrals, education and community programming, and engage in advocacy on and off campus. All of our services are free and open to students and the wider community.

We are committed to addressing and ending gender-based violence and all forms of intersecting violence on campus and beyond.

Our lens:

Our approach, or “the lens” through which we work is central to who we are as an organization, and the ways in which we approach preventing gender-based and sexualized violence and supporting survivors. Our lens as an organization and as a team continues to grow and shift in order to respond to our own un/learning and the needs of our community. *The following are some aspects of our lens:*

- Recognising that our work must actively address the ways in which gender-based violence and sexualized violence are inherently connected to, and rooted in, the ongoing legacy of colonialism. We cannot work towards a ‘consent culture’ without engaging in anti-colonial praxis;
- Recognising the interconnected nature of *all* forms of violence. We cannot address gender-based and sexualized violence without understanding how they intersect with, and uphold, other forms of violence, such as, racism, ableism, transantagonism etc;
- Working with people of all genders in all aspects of our work, including students, staff, volunteers, and community members who use our services;
- Being survivor-centered;
- Working with a commitment to harm reduction;
- Holding a transformative justice lens and a critical stance on law enforcement;
- Sex-positivity and supporting sex workers rights to working conditions that are free from violence and criminalization;
- Working from a reproductive justice framework;
- Upholding community care and response. We strive to support community-based and led responses (especially by survivors) when possible;
- Transparency and accountability to undergraduate and graduate students, whose fees fund our work, as well as the larger community.

## Summary of Recommendations

1. Remove “sexual misconduct” from the *SVMPA* and replace all instances of “sexual misconduct” and/or “sexual violence” with “sexualized violence.”
2. Replace “complaint” with “disclosure” in the *SVMPA*.
3. Provide clear definitions for “disclosure” and “report” respectively.
4. Include a statement of purpose in the *SVMPA*, that reflects the following:
  - That the *SVMPA* is to outline the basic minimum standards that post-secondary institutions must meet as it pertains to preventing and responding to sexualized violence in post-secondary contexts;

- That the spirit of the *SVMPA* is to support the creation of post-secondary communities where sexualized violence is taken seriously, and where meaningful action is taken to prevent and respond to its occurrence in a trauma-informed, survivor-centric, and procedurally fair manner; and
  - That sexualized violence should be viewed as a systemic issue, and that actions to address and prevent it should be holistic, considerate of historical and ongoing context, developed in ways that reflect the unique needs of their post-secondary and surrounding communities, and recognize the inter-related nature of sexualized violence to other forms of oppression and discrimination, including on the basis of sex, gender identity and expression, sexuality, race, ethnicity, Indigeneity, ability, immigration status, and religion.
5. Amend the *SVMPA* to require PSIs to include the 11 minimum standards identified by Students for Consent Culture in their sexualized violence policies.
  6. Amend the *SVMPA* to require PSIs to meet a minimum standard of care for survivors and those affected by sexualized violence by providing reasonable access to emotional support services, third-party advocacy services, as well as necessary accommodations within 48 hours from initial intake. Access to support must also be provided on an ongoing basis throughout any investigation and/or informal resolution process. Those responsible for coordinating and providing these services must be independent from the office that is overseeing or conducting an investigation and/or informal resolution process.
  7. Amend the *SVMPA* so that the mandated policy review process must be guided by a Sexualized Violence Prevention and Support Committee with at least 30% student representation.
  8. Amend the *SVMPA* to require post-secondary institutions to publicly and accessibility disclose who they contract as independent investigators, a description of the selection process and criteria, and what training they receive on conducting investigations related to sexualized violence.
  9. Amend the *SVMPA* to require all investigators, both internal and external, to have training on conducting trauma-informed investigations.
  10. Amend the *SVMPA* to require that post-secondary institutions develop their annual reports in consultation with a mandated Sexualized Violence Prevention and Support Committee with at least 30% student representation.
  11. Amend the *SVMPA* to require post-secondary institutions to provide experience surveys to complainants following the conclusion of an official reporting process, for the purpose of evaluating current practices and identifying opportunities for improvement.

12. Amend the *SVMPA* to require post-secondary institutions to publicly release their annual report, as required under Section 6, in a transparent and accessible manner on their official website, in addition to providing it to the institution's governing body.
13. Amend the *SVMPA* to require that annual reports include the following information:
  - Information on the institutions' prevention and education programming;
  - Data collected on the utilization of the institutions' sexualized violence policy, including:
    - The number of disclosures, reports, and investigations;
    - The number of official reports that reached a conclusion;
    - The types of accommodations and support services accessed by students and campus community members under the policy; and
    - A summary of feedback and recommendations received through any surveys, focus groups, and interviews conducted by the institution, or on behalf of the institution, on its sexualized violence prevention and response efforts.
  - How disclosures and reports were received;
  - Data collected on the utilization of the institution's sexualized violence policy, following a privacy assessment, if appropriate confidentiality considerations are met:
    - The outcomes of formal reports that reached a conclusion;
    - Demographic of survivors, only upon receiving consent from the survivor for the institution to collect their personal information, including status within the institution (faculty, staff, student, or other), gender, race, sexuality, ability, and Indigeneity; and
    - Typology/theme of official reports.
14. Establish an independent oversight body housed either within the Office of the Ombudsperson, or the Office of the Human Rights Commissioner, tasked with overseeing PSIs' compliance with the *SVMPA*, receiving complaints regarding PSIs' policies and practices in responding to sexualized violence, and conducting investigations into PSIs' policies and practices on responding to sexualized violence. We further recommend that this oversight body have an advisory board that includes at least 30% student representation.
15. All guiding documents for post-secondary institutions and service providers on the development and implementation of their sexualized violence policy be reviewed on a two-year basis, in consultation with students, subject-matter experts, and post-secondary service-providers.
16. Develop a guiding document on how to conduct meaningful consultation with students, survivors, and community in the development of sexualized violence policy and programming.

17. Educational materials are reviewed at a minimum of every two years, through meaningful consultation with students, survivors, and the broader community.
18. Education must be trauma informed.
19. Training received by institutional staff and external investigators must be made transparent, and align with minimum standards of knowledge illustrated in policy.
20. Properly support post-secondary sexualized violence prevention and response efforts across BC, beginning with a minimum annual investment of \$5 million over the next three years towards targeted, on-campus initiatives, that is accessible to student-led organizations.
21. Conduct ongoing needs assessment and consultations with the post-secondary sector and other relevant stakeholders to direct funding allocation moving forward.

## Language Changes: For Clarity and Accuracy

**Recommendation: Remove “sexual misconduct” from the SVMPA and replace all instances of “sexual misconduct” and/or “sexual violence” with “sexualized violence.”**

The term “sexual misconduct” is inadequate in encompassing the truly harmful nature of sexualized violence, and is therefore dismissive. “Misconduct” is typically a term associated with infractions against policy or rules of an organization, such as academic misconduct or inappropriate behaviour. However, our primary concern is not and should not be strictly with a violation of a policy or rule, but violence committed against a person that can have significant negative and long-term physical and psychological effects. Furthermore, the term “sexual misconduct” is generally not used amongst subject matter experts, service providers, and advocates. We believe that adopting the language that is actually being used within the field is best practice, both for providing clarity around terminology and accuracy in terms of what we are actually talking about.

The term “sexualized violence” is most appropriate and accurate in actually describing the issue at hand, and is highly flexible in terms of what it can encompass. While we are not opposed to using “sexual violence” as an alternative, we support the use of “sexualized violence” as it appropriately points to the truly violent nature of harmful behaviours that target and disrespect people’s sexuality and gender identity and expression. In other words, it is violence that is sexualized. Through this framing, we place the focus on the violence itself, as we know that sexualized violence is not simply about sexual desire, but about the imposition of power and control over others.

AVP uses the following definition of sexualized violence, which we recommend adopting into the legislation: “Anything that disrespects the sexuality of another person (including disrespect

of asexuality) or is violence in a sexualized context. This includes, but is not limited to, comments, leering, intimidation, coercion, expectations, discrimination, non consensual touching, sexual assault, and sexual harassment.”

Finally, we want to emphasize our opposition to including two categories within the SMPVA and making a distinction between “sexual misconduct” and “sexualized violence”. Doing so would require each category to have very strict and clear definitions, which may lead to unintended loopholes if a certain harmful behaviour does not fit within either category. Secondly, this would create a hierarchy of severity between the two “types” of behaviours. This approach de-centers the actual impact of the behaviour would have had on the person who experienced it in assessing its severity.

**Recommendation: Replace “complaint” with “disclosure” in the SVMPA.**

The term “complaint” is currently used in the legislation in a similar way to how most frontline workers and advocates in the sector use the term “disclosure”. “Complaint” gives the impression that a person who has experienced sexualized violence is *complaining about an inconvenience*. In reality, the practice of sharing one’s experience of sexualized violence is often a very difficult and potentially re-traumatizing experience that should be treated with the appropriate weight.

**Recommendation: Provide clear definitions for “disclosure” and “report” respectively.**

Under 2(1) of the SVMPA, the terms “report” and “complaint” are used, but not defined. In the recent student climate survey on Sexualized Violence on Public Post-Secondary Campuses in BC, only 10% of students reported that their post-secondary institution had done a good job of clearly explaining the difference between making a disclosure of sexualized violence and making a formal report about an instance of sexualized violence (Leger, 2022, p. 13). While post-secondary institutions have a primary responsibility for communicating with their student populations about how their policy operates, amending the legislation to clearly define these two processes would provide clarity for both students and post-secondary institutions.

## Statement of Purpose

**Recommendation: Include a statement of purpose in the SVMPA, that reflects the following:**

**That the SVMPA is to outline the basic minimum standards that post-secondary institutions must meet as it pertains to preventing and responding to sexualized violence in post-secondary contexts;**

**That the spirit of the SVMPA is to support the creation of post-secondary communities where sexualized violence is taken seriously, and where meaningful action is taken to prevent and**

**respond to its occurrence in a trauma-informed, survivor-centric, and procedurally fair manner; and**

**That sexualized violence should be viewed as a systemic issue, and that actions to address and prevent it should be holistic, considerate of historical and ongoing context, developed in ways that reflect the unique needs of their post-secondary and surrounding communities, and recognize the inter-related nature of sexualized violence to other forms of oppression and discrimination, including on the basis of sex, gender identity and expression, sexuality, race, ethnicity, Indigeneity, ability, immigration status, and religion.**

## **Minimum Policy Standards**

**Recommendation: Amend the *SVMPA* to require PSIs to include the 11 minimum standards identified by Students for Consent Culture in their sexualized violence policies.**

It is absolutely imperative that post-secondary institutions be mandated to provide a minimum standard of care for students who have experienced sexualized violence. The current legislation allows for significant variation between policies across institutions. While it is important that flexibility be provided within the legislation so that institutions can develop policies that are responsive to the unique needs of their post-secondary communities, some minimum standards are absolutely necessary so that survivors can expect to receive an appropriate level of care, regardless of where they are attending. We strongly recommend that the *SVMPA* Policy codify Student for Consent Culture's 11 minimum standards, as illustrated in their publication *Moving Beyond Potential: Building Justice for Students in British Columbia*. These minimum standards include:

1. A defined, stand-alone sexualized violence policy;
2. Right to both criminal and institutional processes;
3. Mandatory sexualized violence training for decision-makers;
4. Rape shield protections;
5. Protections from face to face encounters;
6. Timelines;
7. Protection from gag orders;
8. Broader scope;
9. Informing of sanctions;
10. Student representation on committees; and
11. Review period of 2 years.

AVP fully endorses the recommendations for the implementation of these 11 minimum standards as articulated in *Moving Beyond Potential: Building Justice for Students in British Columbia*. We ask that this document be referred to as a supplemental document to our own

submission. In addition to this document, we would like to build upon recommendations 3, 7, 8, and 10.

### **3. Mandatory Sexual Violence Training for Decision-Makers:**

“A mandate of quality and expert-informed sexualized violence sensitivity training on trauma informed approaches for those involved in hearing the sexualized violence complaint and deciding the outcomes” (p.5).

As illustrated under “Training, Education, and Prevention” as well, it is absolutely imperative that all staff and external investigators in contact with survivors throughout the entire disclosure, reporting, and/or investigation process must be trained in trauma informed approaches to this work.

### **7. Protections from Gag Orders:**

“Protections from institutions imposing a gag order on complainants through a broadly defined confidentiality requirement” (p. 7).

Gag orders are a common and dehumanizing practice many survivors are subject to under current policy. The ability to talk and gain support from others is imperative to the healing of survivors, and doing so outside of the institution should be a freedom afforded to all survivors. Gag orders also potentially reduce the accountability of institutions, if used to block survivors from speaking about their experiences seeking support from their school.

### **8. Broader Scope:**

“Campus sexualized violence policies must explicitly create a procedure for students to report sexualized violence and/or sexual harassment while participating in a work placement, internship or co-op and require that the institution keep record of in which places sexualized violence has occurred to ensure that future students are not placed at risk of sexualized violence while pursuing co-op opportunities. This will require many institutions broadening the scope of their policies and support to ensure students have access to these accommodations and supports regardless of where violence occurs” (p. 7).

The scope of care adopted by PSIs for survivors of sexualized and gender based violence should be expansive as possible, to account for the diversity in experience students have. For universities with residences, the policy should include any act of violence within these spaces. Expanding the policy to include all workplace, internships, and co-ops, as well as during and following university sanctioned events both on and off campus is an ideal response to ensure the safety of students.

### **10. Student Representation on Committees:**

“A mandate for the creation of a Sexual Violence Prevention and Support taskforce, with meaningful student representation of at least 30%, at each institution” (p.7).

As discussed in “Transparency, Accountability, and Oversight”, it is recommended that there is an amendment so that the *SVMPA* requires post-secondary institutions to develop their annual



reports in consultation with a mandated Sexualized Violence Prevention and Support Committee with at least 30% student representation. An overview of the duties of these committees, as well as transparent selection processes, with a focus on engaging students with lived experience, should be included in the policy. Student voice and experience should be at the center of all policy decisions, and this is one way to ensure consistent accountability to this fact.

**Recommendation: Amend the SVMPA to require PSIs to meet a minimum standard of care for survivors and those affected by sexualized violence by providing reasonable access to emotional support services, third-party advocacy services, as well as necessary accommodations within 48 hours from initial intake. Access to support must also be provided on an ongoing basis throughout any investigation and/or informal resolution process. Those responsible for coordinating and providing these services must be independent from the office that is overseeing or conducting an investigation and/or informal resolution process.**

Waitlists for on- and off-campus counselling services are often long. Survivors need the most emotional support immediately following the experience of sexualized violence, or immediately following the disclosure/making a report—waiting at least one month or more for support is not acceptable and crisis-lines do not provide ongoing support. Having to retell one's story each time is highly triggering and can cause more emotional/psychological harm.

Having access to on-campus student-led services (like AVP) is important and helpful, but they are often **highly underfunded** and do not have targeted funding to be able to provide non-clinical emotional/psychological support and advocacy to survivors in a **timely** or **ongoing** way. There needs to be guidelines within the SVMPA on the types of support that should be made available to survivors, so that specific funding can be made available to employ a designated person (or people, depending on the size and needs of the institution) to:

- Support the survivor through the entire process of disclosing or making a report;
- Provide ongoing support and advocacy until the investigation process is complete (if a report is made) (see for example Griffin, et al., 2016, p. 49); and
- Until counselling services, or another preferred type of support service (identified by the survivor), can be accessed.

## The Policy Review Process

**Recommendation: Amend the SVMPA so that the mandated policy review process must be guided by a Sexualized Violence Prevention and Support Committee with at least 30% student representation.**

The current mandatory policy review process must be more clearly defined in the legislation. While the fact that the legislation currently requires that students be consulted on the initial development and three-year review of their institutions' policy is important, it is inadequate.

Under the current requirements, a post-secondary institution could ask a random student what they think about the current policy, incorporate none of their recommendations, and still *technically* fulfill their obligations to consult students. By requiring that a mandated Sexualized Violence Prevention and Support Committee with a minimum of 30% student representation lead the review process, PSIs will still be allowed to conduct their consultation and policy review processes with a high degree of flexibility, while being required to conduct this process through an existing structure and a with a group of students who have existing familiarity with the subject matter and institutional context.

## Investigations and Decision-Making Processes: Improving Transparency

**Recommendation: That the SVMPA be amended to require post-secondary institutions to publicly and accessibility disclose who they contract as independent investigators, a description of the selection process and criteria, and what training they receive on conducting investigations related to sexualized violence.**

**Recommendation: Amend the SVMPA to require all investigators, both internal and external, to have training on conducting trauma-informed investigations.**

Investigations must exist as tools for survivors to utilize and seek healing as safely and transparently as possible. While institutionalized forms of justice seeking such as reporting to institutions are often not designed to support survivors and meet them with unconditional belief and care, these processes still hold immense value for many survivors seeking accountability. Therefore, PSIs should endeavor to create a transparent reporting and investigation process that strives to be as trauma informed as possible. Investigation procedures should be transparent, and those seeking information shall be offered holistic information on what the investigation process will look like.

Institutions should have clear guidelines for publicly sharing information on who they hire as independent investigators, how they are selected, and what training they have received. There should be a clear standard for the types of experience and training necessary to do this work, illustrated by the policy. This should include minimum training requirements on the impacts of trauma specifically around sexualized violence, and clear expectations surrounding the treatment of survivors, including education on the impacts of victim blaming. Whatever training investigators have should be made publicly available so that survivors can make an informed decision about whether they want to go through with an investigation process or not.

## Transparency, Accountability, and Oversight

**Recommendation: Amend the SVMPA to require that post-secondary institutions develop their annual reports in consultation with a mandated Sexualized Violence Prevention and Support Committee with at least 30% student representation.**

**Recommendation: Amend the SVMPA to require post-secondary institutions to provide experience surveys to complainants following the conclusion of an official reporting process, for the purpose of evaluating current practices and identifying opportunities for improvement.**

The current mandate for PSIs to report annually on the implementation of their sexualized violence policies is an absolutely crucial measure for effectively addressing and preventing sexualized violence. However, these reports cannot be sufficiently effective at actually capturing the current climate around sexualized violence at a given PSI if the people most affected by the institutions' policy, practices, and programming, do not have their perspectives included. As McMahon, et al. (2022) demonstrate, by providing end-users the opportunity to participate in the evaluation process is essential to identifying gaps and opportunities for growth that lead to actual reductions in sexualized violence over time (p. 3). McMahon, et al. (2021) also emphasize the central role that students can play in creating meaningful change on campus by harnessing their capacity as peer-educators, policy experts, researchers, and curriculum-builders (p. 845). While students are required to be consulted on the policy development process every three years, we know that addressing sexualized violence must be ongoing, and student voices are crucial at every step of that work.

**Recommendation: Amend the SVMPA to require post-secondary institutions to publicly release their annual report, as required under Section 6, in a transparent and accessible manner on their official website, in addition to providing it to the institution's governing body.**

The current lack of clarity within the SVMPA allows institutions to not provide their annual reports to the student body and the broader community. The information in these reports is of significant value both to students affected by sexualized violence, on-campus groups supporting those affected by sexualized violence, as well as community-based sexualized violence response organizations who serve local campus communities. Furthermore, even if an institution's annual report is publicly available through the agenda or minutes of their governing body, this is not necessarily transparent or accessible. While we are unaware of the reporting practices at each PSI in BC, Karen Busby's 2018 study of post-secondary institutional reporting practices across BC, Ontario, and Quebec, found that *only one of the twenty-one institutions surveyed had their annual report available on the institution's website* (p. 57). Most students and community members do not have a clear understanding of post-secondary governance structures. These agenda and minute packages are also often several hundred pages long, and difficult to navigate. Simply having the report available *somewhere* on the website, does not necessarily mean it is accessible.

**Recommendation: Amend the SVMPA to require that annual reports include the following information:**

- **Information on the institutions' prevention and education programming;**
- **Data collected on the utilization of the institutions' sexualized violence policy, including:**
  - **The number of disclosures, reports, and investigations;**
  - **The number of official reports that reached a conclusion;**
  - **The types of accommodations and support services accessed by students and campus community members under the policy; and**
  - **A summary of feedback and recommendations received through any surveys, focus groups, and interviews conducted by the institution, or on behalf of the institution, on its sexualized violence prevention and response efforts.**
- **How disclosures and reports were received;**
- **Data collected on the utilization of the institution's sexualized violence policy, following a privacy assessment, if appropriate confidentiality considerations are met:**
  - **The outcomes of formal reports that reached a conclusion;**
  - **Demographic of survivors, only upon receiving consent from the survivor for the institution to collect their personal information, including status within the institution (faculty, staff, student, or other), gender, race, sexuality, ability, and Indigeneity; and**
  - **Typology/theme of official reports.**

The case for providing greater public disclosure of statistics on sexualized violence in PSIs is well established. As Canadian legal scholar, Karen Busby (2018) states, "in order to evaluate the effectiveness of universities' sexual violence and misconduct policies, data needs to be collected by institutions and made publicly available" (p. 54). The Metropolitan Action Committee on Violence Against Women and Children (METRAC), further supports this argument (Gunraj, 2014, p. 14, 15). We can also draw important lessons from the United States on this issue, as there is federal legislation requiring the annual public disclosure of violent crime statistics, including on different forms of sexualized violence, as well as PSIs' efforts to prevent sexualized violence under the Clery Act and subsequent SaVE Act (Gunraj, 2014, p. 14). However, as Ridolfi-Starr (2016) points out, even this legislation does not go far enough in terms of building transparency and trust between the study body and the institution, including both survivors and those who have caused harm (p. 2159). By failing to provide accurate information at the institutional level, and not simply the provincial or national level, trust can become eroded between the institution and those subject to its policies when students do not have a clear picture of how the institution is going about responding to sexualized violence (p. 2161).

**Recommendation: Establish an independent oversight body housed either within the Office of the Ombudsperson, or the Office of the Human Rights Commissioner, tasked with overseeing**

**PSIs' compliance with the *SVMPA*, receiving complaints regarding PSIs' policies and practices in responding to sexualized violence, and conducting investigations into PSIs' policies and practices on responding to sexualized violence. We further recommend that this oversight body have an advisory board that includes at least 30% student representation.**

PSIs across Canada have been consistently found to have committed gross misconduct in their responses to sexualized violence and routinely failed survivors and those affected by sexualized violence. Survivors have reported being victim-blamed, ignored, belittled, and dragged through confusing investigation processes, only to be met with completely ineffective accommodations and safety planning (if any), and disciplinary actions against their assailants that in no way match the severity of their actions and the long-lasting harm they caused. While the *SVMPA* was introduced specifically in order to address these issues of institutional betrayal, without proper oversight, survivors continue to be left with nowhere to turn when their PSI violates their rights or even goes against their own sexualized violence policy. Drawing from the lessons we have learned from the United States and their post-secondary sexualized violence legislation, we know that only 11% of PSIs were found to be in full compliance with their requirements under the SaVE Act, based on a sample of 435 institutions from across the country (Griffin, et al., 2016, p. 401). While we cannot draw direct comparisons between BC PSIs and those in the US, we can clearly see from this example that PSIs will not necessarily abide by legislated requirements if they are not subject to proper oversight. We also know that there is a significant gap between what PSIs proclaim to do in their policies and public-facing rhetoric, and what they are actually doing in practice (Spicer & Poirier, 2022; Colpitts, 2021, p. 9).

We recognize that the call for an independent oversight body has been led by Students for Consent Culture, and once again point to their excellent work in *Moving Beyond Potential*. We also want to emphasize in particular that this has been a call to action from students that we directly serve. When institutions are tasked with holding themselves accountable, no true accountability can be attained.

## **Plain Language Policy Guidelines and Other Guiding Documents**

**Recommendation: All guiding documents for post-secondary institutions and service providers on the development and implementation of their sexualized violence policy be reviewed on a two-year basis, in consultation with students, subject-matter experts, and post-secondary service-providers.**

**Recommendation: Develop a guiding document on how to conduct meaningful consultation with students, survivors, and community in the development of sexualized violence policy and programming.**

In addition to a legislated mandate to consult, we recommend creating a document on how to conduct meaningful consultations with affected communities on the review of sexualized violence policy and the development of related prevention and response programming. This document would cover topics such as: what *meaningful* consultation is, how to create safer spaces for survivors and those who have experienced trauma related to sexualized violence and various forms of systemic oppression, what kinds of safety and support procedures should be in place, and best practices for working with community partners. We recommend that this document be developed in collaboration with undergraduate and graduate student associations, student-led sexualized violence organizations, community-based sexualized violence response organizations, post-secondary sexualized violence prevention and response staff, and community organizations dedicated to serving groups that are targeted at higher rates for sexualized violence and who face higher barriers to justice and support.

## Training, Education, and Prevention

**Recommendation: Educational materials be reviewed at a minimum of every two years, through meaningful consultation with student, survivor, and broader community.**

**Recommendation: Education must be trauma informed.**

**Recommendation: Training received by institutional staff and external investigators must be made transparent, and align with minimum standards of knowledge illustrated in policy.**

Prevention and education are integral to responding to sexualized violence on BC campuses. Educational spaces hold the potential to exist as safer spaces for the students and community to understand consent, boundaries, reflect on their own behaviours, gain support skills, and build solidarity. Education also has the potential for immense harm, if not developed in collaboration and in solidarity with survivor communities, and without the recognition that student experiences are vast, and informed by identity, culture, and lived experience. Without an intersectional approach, educational materials can feel tailored to the most privileged in the room, erasing and denying the experiences of diverse populations of students. Just as support services should be trauma informed, applying the same lenses to education is imperative, as we know due to the pervasive nature of sexualized and gender based violence, there will be survivors in every workshop run by any given institution. Placing these students at risk of harm, and potential re-traumatization, is unacceptable. Transparency on what will be included in each session, content warnings, the ability to leave without penalty, and support services being shared and available are all bare minimums of trauma informed approaches to education.

We recommend the regular review of educational materials, through *meaningful* consultation with the campus community *at minimum*, every two years. This should include direct collaboration between institutions and students, specifically those with experiences of marginalization and oppression, student unions, and student-led sexualized and gender based

violence centres through committees, focus groups, surveys, etc. Regular feedback should be collected and implemented to ensure educational materials remain responsive and relevant. If institutions contract outside workshop materials, the same methods of feedback and review should be in place, with initial consultation from the above parties prior to signing any agreements.

The training institutional staff and external investigators receive should be transparent and publicly reported in accessible ways. There should be a clear standard for the types of experience and training necessary to do this work, illustrated by the policy. This should include minimum training requirements on the impacts of trauma specifically around sexualized violence, understanding sexualized and gender based violence through the lenses of systemic and intersecting oppression, and clear expectations surrounding the treatment of survivors, including education on the impacts of victim blaming.

## **Supporting Proper Implementation: The Need for Consistent, Targeted, and Adequate Funding**

**Recommendation: Properly support post-secondary sexualized violence prevention and response efforts across BC, beginning with a minimum annual investment of \$5 million over the next three years towards targeted, on-campus initiatives, that is accessible to student-led organizations.**

**Recommendation: Conduct ongoing needs assessment and consultations with the post-secondary sector and other relevant stakeholders to direct funding allocation moving forward.**

Consistent, targeted, and adequate funding must be properly implemented in order for our awareness and prevention efforts to be most effective. As a starting point, AVP strongly recommends that a minimum of \$5 million be allocated towards funding sexualized and gender-based violence initiatives at PSI's over the next three years.

This funding must be made accessible to student-led organizations (like AVP) engaged in anti-violence work. These groups hold crucial on-the ground experience, reach and expertise that most post-secondary institutions do not, yet lack the resources needed to sustain themselves and their work. Additionally, their position as entities separate from PSI's allows them to be accountable to students and survivors first and foremost, as well as to address any gaps in the support services available at PSI's. As mentioned, this number is simply a starting point. To meet the ever growing needs of survivors, ongoing needs assessments and consultations must be conducted within the sector.

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