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DATA COLLECTION, REPORTING, AND INSTITUTIONAL ACCOUNTABILITY

A STUDENT SUBMISSION ON STANDARDS
FOR DATA COLLECTION AND REPORTING OF
CAMPUS SEXUALIZED VIOLENCE POLICY
UTILIZATION AND IMPLEMENTATION

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Training of British Columbia

A NOTE ON TERMINOLOGY

The language that we use to discuss various social issues and phenomena is regularly evolving, and can change quickly as new information comes to light and the perspectives of historically marginalized communities are taken into consideration. In this document, we use “sexualized violence”, rather than “sexual violence” or “sexual misconduct”, to discuss issues surrounding any form of violence that targets the gender identity or sexuality of another individual or group of individuals. By using “sexualized violence”, we seek to emphasize the truly violent nature of these issues.

Misconduct suggests that these matters are akin to other forms of misconduct in post-secondary environments, such as academic misconduct and plagiarism. The term “misconduct” does not properly convey the harmful nature of sexualized violence and the long-term and often devastating impacts that it has on the wellbeing of individuals and communities. In the cases where “sexual violence and misconduct” is used in this document, it refers to the wording used in the Sexual Violence and Misconduct Policy Act (Act 23).

SUMMARY OF RECOMMENDATIONS

-GOVERNMENT

1. That publicly funded post-secondary institutions in BC be required to collect and publicly report data on the utilization and implementation of their respective sexual violence and misconduct policies, which includes the following:

MANDATORY

- Number of reports, complaints, recorded disclosures;
- How were these reports and disclosures received? (third party or anonymous reporting, in person, online?);
- Number of reports that reach a conclusion;
- Activities and education undertaken by the campus during that year to raise awareness of the policy, rape culture, or issues of consent;
 - Any information gathered from these, such as surveys completed by participants to gauge the quality and relevance of the activities; and
- Overarching themes and recommendations arising from experience surveys for those who have utilized the policy to submit a formal report, make a disclosure, or access support services or accommodations. For this we recommend that institutions be required to provide these surveys but that filling them out be made optional for those who have utilized the policy.

REQUIRED IF CONFIDENTIALITY CONSIDERATIONS ARE SATISFIED

- The outcomes of completed reports;
- Demographics of survivor (including gender, racialized identity (Black, of colour, white, etc.), Indigeneity, sexuality, dis/ability, and student, faculty or staff status);
- Typology/theme of the report (digital harassment, alcohol or drug-related, etc.); and
- Types of accommodations and supports utilized by survivors.

2. That the recommendations listed under Recommendation 1. be amended into the Sexual Violence and Misconduct Policy Act (Act 23) through regulation.

3. That post-secondary institutions are required to offer a standardized feedback survey to survivors/ complainants who have made an official report of sexualized violence on their experience accessing services and supports from the institution, and the formal reporting and investigation process. These surveys should be optional for the survivor/ complainant, and should be provided at whatever final point it reached, regardless of whether it was by the survivor/ complainant's request, an official ruling, or the finalization of an appeal process.

a) We further recommend that the anonymized information provided in the survey responses be included in the annual report to the institution's governing body on the implementation of the policy.

4. That a rubric be developed, as outlined in *Courage to Act* (Khan, et al., 2019, see recommendation 6, p. 27-28), to support consistency in data collection, reporting, and record retention and accessibility.

a) We further recommend that the rubric specifically address the importance of protecting the confidentiality of survivors/ complainants and clearly defining under what circumstances certain data should not be publicly reported;

b) We further recommend that specific guidelines be developed to guide institutions on how to ensure these reports are easily accessible and publicly available on their websites;

c) We further recommend that the following groups have representation in the rubric's development:

- Institutions, (including researchers from institutions)
- Campus and community violence-prevention organizations
- Student associations
- Indigenous community organizations.

5. That the Ministry of Advanced Education, Skills and Training require publicly-funded post secondary institutions to provide their annual policy implementation reports to the Ministry, in addition to the institution's respective governing body.

6. That the Ministry of Advanced Education, Skills and Training collect reports from each publicly-funded post-secondary institution's undergraduate student association (and graduate student association if one exists) on their respective institution's three-year policy review processes, which includes the ways in which students were consulted and involved in the review process, a list of the recommended changes to the policy that students advocated for, and which of the students' recommendations were adopted into the policy.

7. That the Ministry of Advanced Education, Skills and Training set a standardized date by which each publicly-funded post-secondary institution in the province must have submitted its annual sexual violence and misconduct policy implementation report to their respective governing body and to the Ministry.

SUMMARY OF RECOMMENDATIONS

-INSTITUTIONS

1. That each publicly-funded post-secondary institution conducts a needs assessment of its existing staff and/or intake offices responsible for addressing, preventing, and responding to campus sexualized violence to determine whether they have the resources and capacity available in order to meet demand. In cases where demand is exceeding resources and capacity, we sincerely request that the appropriate annual funding be allocated to these individuals and/or offices.

2. That Institutions ensure they are engaging with student associations, campus violence-prevention organizations, community violence-prevention organizations, and community organizations representing equity-seeking communities (including but not limited to Indigenous, 2SLGBTQQIA+, people with disabilities, and racialized communities) in assessing and developing their sexualized violence prevention, awareness, and response initiatives, including data collection and reporting. We further recommend that all groups providing consultation and advising services be appropriately compensated by institutions for their time and work.

3. That institutions' annual reports include which organizations and community members they have consulted and partnered with in their sexualized violence prevention, awareness, and response initiatives, and sexualized violence policy development and review processes. We further recommend that the reports specify how these organizations support these ongoing efforts.

BACKGROUND

This document has been prepared for the Ministry of Advanced Education, Skills and Training by student advocates to demonstrate the need for consistency and transparency in institutional reporting on the implementation and utilization of sexual violence and misconduct policies. We draw upon Canadian research and expert opinions to highlight the necessity of publicly available data and progress reporting, centering the needs of students, survivors, and community sexualized violence prevention organizations.

While the emergence of provincial legislation regarding on-campus sexualized violence policies began in 2015, student-survivors and advocates had been pushing for institutions to create stand-alone policies in British Columbia for decades. For example, at the University of Victoria in 1996, the Anti Violence Project (AVP; formally the Date Rape and Dating Violence Education Project) conducted a campus-wide survey on the prevalence of sexualized violence. Based on the survey results, AVP provided several recommendations, including the creation of specific services and policies to address sexualized violence on campus. This is just one example of the ways in which student-survivors and advocates have consistently demanded institutional accountability as well as stronger structural supports for all those on campus who experience sexualized violence.

In more recent years, student-survivors and advocates have galvanized through provincial and cross-country solidarity movements demanding binding provincial legislation regarding campus sexualized violence prevention and response. Prior to the creation of Act 23, student-survivors began sharing their stories publicly, revealing several instances in which post-secondary institutions mishandled cases of sexualized violence. At the University of British Columbia, six women came forward accusing the institution of failing to adequately handle their complaints against another student on campus (Global News, 2015). At UVic, several student-survivors and staff publicly shared how they felt silenced by the institution regarding experiences of sexual assault that happened in residence (Kane, 2017). Amid several other stories of campus sexualized violence in BC, student-based advocacy groups such as the Alliance of BC Students and the BC Federation of Students focused lobbying efforts on addressing this issue through binding legislation.

The impact of this advocacy was such that when Act 23 was eventually introduced in the spring of 2016, former Minister of Advanced Education, Andrew Wilkinson stated that the bill was the direct result of demands from student-survivors and activists (Hansard, 2016). Accordingly, we share this brief history of advocacy here to highlight the integral role of student-survivors and advocates' voices in the creation of sexualized violence legislation in British Columbia.

We want to situate this document and our ongoing work as student representatives within a larger movement across the country that has been built upon the tireless work of advocates and organizations over several decades. We wish to highlight the magnitude of this call to action, and emphasize the critical role that standardized, transparent, and accessible data collection and reporting plays in the work of student organization and community-based sexualized violence-prevention groups. The following is a small selection of the organizations that have called for data collection and public reporting around campus sexualized violence:

- ALLIANCE OF BC STUDENTS (ABCS)
- STUDENTS FOR CONSENT CULTURE (SFCC)
- BC FEDERATION OF STUDENTS (BCFS)
- ONTARIO UNDERGRADUATE STUDENT ALLIANCE (OUSA)
- COURAGE TO ACT (DRAFT NATIONAL FRAMEWORK ON ENDING CAMPUS GENDER-BASED VIOLENCE FROM POSSIBILITY SEEDS)
- SILENCE IS VIOLENCE
- COLLEGE STUDENT ALLIANCE (ONTARIO)
- STUDENTS NOVA SCOTIA

Though many student-led and anti-violence organizations have recently called for a comprehensive approach to data and reporting, we also recognize that many community-based groups have been collecting data regarding usage of services for many years. This data has been crucial to the assessment and improvement of supports as well as advocating for policy and response based on service usage. For example, the Anti Violence Project has collected data on peer-based support sessions since 1996, which has illuminated valuable themes and patterns on-campus such as spikes in service usage during the month of September.

REPORTING REQUIREMENTS

Under 6. (2) of Act 23, the President of each publicly funded post-secondary institution in the province must provide an annual report to the governing body of their respective institution on the implementation of their sexual violence and misconduct policy. The content of these reports should include information that helps to meaningfully assess the effectiveness of these policies, and to identify key areas in need of additional support and intervention. Annual reports should also be required to be submitted by a specific deadline in order to further facilitate accountability and transparency. The following is a list of data and information that we recommend must be made mandatory to include in annual institutional reports, as well as categories that must be included provided that certain conditions of confidentiality are met. We strongly recommend that Act 23 be amended to include these specific reporting requirements through regulation. These recommendations have been developed by Students for Consent Culture (SFCC), which is a student survivor-led grassroots national organization, and are supported and advocated for by the Alliance of BC Students (ABCS) (ABCS, 2019). For more information on these recommendations and the SFCC's work in BC, please read "Moving Beyond Potential" (Spencer and Spicer, 2019).



REPORTING REQUIREMENTS

-MANDATORY

- Number of reports, complaints, recorded disclosures;
- How were these reports and disclosures received? (third party or anonymous reporting, in-person, online?);
- Number of reports that reach a conclusion;
- Activities and education undertaken by the campus during that year to raise awareness of the policy, rape culture, or issues of consent; Any information gathered from these, such as surveys completed by participants to gauge the quality and relevance of the activities;
- The campus and community organizations that have been consulted or that the institution has partnered with in the development, review, and implementation of their sexualized violence prevention, response, and awareness services, programs, and policies. In addition to the organizations involved, the specifics of these partnerships and consultations should also be provided;
- The number of times students and campus community members visited or reached out to the office responsible for receiving disclosures and reports and/or overseeing the implementation of the policy to seek information, access services, make a disclosure, or file a report;
- An outline of the process that the institution has developed for survivors and those impacted by sexualized violence to seek and access support, to make a disclosure, and to file a report; and
- Overarching themes and recommendations arising from experience surveys for those who have utilized the policy to submit a formal report, make a disclosure, or access support services or accommodations. For this we recommend that institutions be required to provide these surveys but that filling them out be made optional for those who have utilized the policy.

The data that will be collected and distributed under these categories will help campus communities, government and anti-violence organizations develop a better understanding of rates of reporting over time and whether or not sexualized violence prevention and awareness efforts on campus are having an impact on this. As the Province works towards developing resources and programs for institutions, having this information will also allow the Ministry to continuously assess where the gaps in services are and tailor ongoing efforts to better address them. Furthermore, the information gathered through experience surveys is critical in assessing whether campus sexualized violence policies are actually meeting the needs of survivors and are rooted in a trauma-informed approach. While policies can be assessed on their own, the practices employed by institutions in responding to sexualized violence must also be assessed so that we can work towards better communities of practice at our institutions over time.

TRAUMA-INFORMED

Being “Trauma-informed” is to be informed and understanding of the ways that trauma specifically impacts survivors and those affected by sexualized violence, and then responding in a manner that is built around supporting those who have experienced trauma. Trauma-informed practices centre the needs of survivors and support their empowerment and self-determination throughout their recovery process. Trauma-informed practices seek to minimize the impacts of trauma and minimize the risk of re-traumatization for survivors as they seek support and justice (Salvino, et al., 2017). The Ending Violence Association of BC (EVA BC) (2016) outlines the following principles in developing trauma-informed practices to prevent, address, and respond to campus sexualized violence:

- Acknowledging the impact of trauma;
- Empowering survivors;
- Maximizing choice related to disclosing, reporting, and accessing support;
- Restoring control to the survivor;
- Recognizing the survivor’s need for (and right to) safety;
- Building on the survivor’s strengths;
- Treating the survivor with dignity and respect;
- Moving forward at the survivor’s own pace;
- Respecting the survivor’s right to privacy.

(Ending Violence Association of BC, 2016, p. 23)

REPORTING REQUIREMENTS

-REQUIRED IF CONFIDENTIALITY CONSIDERATIONS ARE SATISFIED

- The outcomes of completed reports;
- Demographics of survivor/ complainant and respondent (including gender, racialized identity (Black, of colour, white, etc.), Indigeneity, sexuality, dis/ability, and student, faculty or staff status);
- Typology/theme of the report (digital harassment, alcohol or drug-related, etc.); and
- Types of accommodations and supports offered to and utilized by survivors.

Protecting the confidentiality of survivors/ complainants must be of the utmost importance. Survivors put themselves in an extremely vulnerable position by coming forward with disclosures and official reports, and any failure to protect their right to confidentiality can lead to devastating impacts to their physical, mental, emotional, and psychological safety and wellbeing. This however, does not negate the importance of having publicly available disaggregated data on the experiences of survivors and the prevalence of sexualized violence at our institutions. In order to better meet the needs of survivors and effectively address campus sexualized violence at our institutions, the emphasis must always be on protecting confidentiality for the wellbeing of survivors and those affected by sexualized violence, and not on protecting institutional reputations. There must be proper accountability mechanisms and standards in place to ensure that any information not included in annual reports is to the benefit of survivors and not solely to the benefit of the institution. This information must also be collected and presented in a manner that is beneficial to the government and effectively facilitates more robust accountability frameworks. We recommend that clearly defined standards be set within the institutional data collection and reporting rubric (see Government Recommendation 4) that outline under what circumstances certain types of data may not be reported in the interest of survivor/ complainant confidentiality.

We wish to caution against the interpretation of annual data as being a sufficient representation of the prevalence of sexualized violence and the forms that it takes at institutions. Sexualized violence is significantly under-reported, and is less likely to be reported by Black, Indigenous and women of colour (BIPOC) due to previous experiences of discrimination, (Brennan, 2013), as well as women with disabilities due to fear of discrimination, financial dependence on their abuser, or lack of accessible services (DisAbled Women's Network of Canada, 2014). These factors make it difficult to draw appropriate conclusions based solely on the number of formal reports or disclosures made in a given year. This information should be collected with the understanding that consistent, disaggregated data collection over time will help to reveal patterns as well as indicate areas in need of intervention.

PUBLIC REPORTING AND COMMUNITY ACCOUNTABILITY

While institutions are required to complete an annual report regarding their sexual violence and misconduct policies under Act 23, there is no direction as to what needs to be included in these reports. Furthermore, these reports only need to be provided to the institution's respective governing body. These reports not only offer an opportunity for better public awareness of campus sexualized violence, but could also be utilized to inform more robust policy, service, and funding solutions if proper information is collected through them over the years and made publicly available. Publicly-funded institutions are a public service, making it absolutely essential that their responses to public safety and health issues be transparent and accountable to the wider community, especially to students. Currently, many of the required reports under Act 23 are not accessible to students or to the general public. Many are only available in Board of Governors' meeting agendas, which are notoriously lengthy, and are not found easily by navigating institutions' websites. Clear guidelines must be developed and included in the rubric (see Government Recommendation 4) to ensure that these reports are made easily accessible and publicly available to all community members. The collection and analysis of relevant data is critical to developing comprehensive solutions to social problems in every area, and forms the basis of effective gender-based analysis plus (GBA+), which is employed by and advocated for within the BC Gender Equity Office (Government of British Columbia, n.d.). Busby and Birenbaum (2020) assert that

collection and analysis of relevant data is critical to developing comprehensive solutions to social problems in every area, and forms the basis of effective gender-based analysis plus (GBA+), which is employed by and advocated for within the BC Gender Equity Office (Government of British Columbia, n.d.). Busby and Birenbaum (2020) assert that...

"The effectiveness of campus policies cannot be measured if data are not collected and made publicly available...The potential for public accountability of post-secondary institutions is very limited unless meaningful data about their handling of sexual violence complaints are collected and published."

In 2018, the federal government dedicated \$5.5 million towards the development of a national framework to address campus gender-based violence based on extensive community consultation, robust academic research, and expert opinion. In 2019, the draft report, *Courage to Act* was released (Khan, et al., 2019). This project consisted of consultations with over 60 institutional representatives, over 30 listening and learning consultation groups with more than 300 participants in total, and a 29 person advisory committee, resulting in 45 recommendations for institutions and governments across the country to better address campus gender-based violence, including sexualized violence. Recommendation 6 calls for institutions to "Establish centralized data collection, reporting and public disclosures of statistics" (p. 27) and for the development of a rubric for institutions to follow in order to ensure consistent data collection and record retention over time. The report consistently addresses the urgent need for greater availability of Canadian data and research studies on campus gender-based violence, highlighting one listening and learning participant's interpretation of the consultations as "a unanimous plea for more information" (p. 28). The weight of this recommendation should not be taken lightly, given the thoroughness and degree of consultations conducted and expertise employed in the development of the draft framework.

Courage to Act further calls for individual institutions to employ a GBA+ model to strategically address gender-based violence. Effective GBA+ analysis requires the availability of robust qualitative and quantitative data that is inclusive of different categories of social identities (ie. disaggregated data). Without this vital information, initiatives to address and prevent campus sexualized violence are not likely to properly target and address key issues, and may ultimately end up being ineffective (Khan, et al., 2019 and Status of Women Canada, 2018). Having publicly available data on campus sexualized violence at the institutional and provincial levels is also necessary for campus and community organizations. This information is essential in order for us to improve our own outreach, services, and funding priorities surrounding sexualized violence as student organizations, while properly incorporating GBA+.

As an example of effective data collection and reporting practices, the University of Victoria's Equity and Human Rights office has voluntarily released publicly available data on the implementation and utilization of their Sexual Violence Prevention and Response Policy (SVPRP) in the annual report to the Board of Governors (Fagan, 2019). The data contained in these reports include the numbers of formal reports, disclosures, and the number of investigated cases that reached an outcome. Furthermore, the data also contains some demographic details, including the gender of survivors/complainants and respondents and whether survivors/ complainants and respondents were students, faculty or staff. Notably, the number of disclosures and formal reports of sexualized violence at UVic went up by almost fifty percent between May 2018 and September 2019 (Ibid.). The information provided in these reports will allow the institution and campus community to respond more effectively to sexualized violence when data is continuously released over time through strategic investments in prevention and response. The changes we are recommending to data collection and reporting are possible, and many are already being implemented in BC.

As highlighted by Busby (2018), no current provincial campus sexualized violence policy legislation includes sufficient requirements for the provision of institutional data and reporting on policy implementation or cases and their outcomes. Ontario, Prince Edward Island, the Yukon, Manitoba and Quebec have all passed similar legislation to Act 23, with various approaches to data collection and public reporting (Busby and Birenbaum, 2020). While Ontario and Quebec's legislation both require institutional data collection on reports, outcomes, types of services accessed by survivors, and policy implementation and effectiveness, Ontario institutions are not required to make this data publicly available, and Quebec's legislation is unclear. Manitoba's legislation, on the other hand, requires that post-secondary institutions publicly report information on the activities and results of those activities under the sexualized violence policy, but no further clarifications are provided. This lack of consistency and transparency leads to ineffective approaches to addressing campus sexualized violence and diminishes the opportunities for institutional accountability (Busby, 2018 & Busby and Birenbaum, 2020).

While the availability of Canadian data in this area is exceptionally limited, there are international examples of government interventions that require public reporting of data on campus sexualized violence at the institutional level. In the United States under the Obama administration, amendments were made to Jeanne Clery Action of 1991 through the Campus Sexual Violence Elimination Act (the SaVE Act) to require public institutional campus crime reporting, including information on prevention and education, dating violence, domestic violence, and stalking (Marshall, 2014). As the 2014 discussion paper from Metrac, Sexual Assault Policies on Campus,

the lack of public data across Canadian institutions, as opposed to those in the US, makes it difficult if not impossible to assess whether institutions are employing promising practices emerging across North America and how effective existing intervention are.

(also see Khan, et al., 2019, Busby 2018, & Rix and Sedighi, 2018).

Making this data consistent and publicly available will allow BC institutions to learn from one another and engage in more robust information sharing that simultaneously allows student organizations, government, and anti-violence organizations to monitor institutional effectiveness and compliance with Act 23.

Accountability to the wider community also requires the government to be a partner in ensuring that institutions are meeting their obligations. This includes actively monitoring the three-year policy review processes, as well as the annual reports to an institution's governing body. We recommend that the Ministry of Advanced Education, Skills and Training require institutions to submit their annual reports in addition to their three-year review reports, in order to ensure each institution's compliance with their obligations under Act 23 and to support the government's ongoing understanding of the province-wide response to campus sexualized violence. In addition to collecting reports from publicly-funded post-secondary institutions on their three-year policy review process, we also strongly recommend that the Ministry of Advanced Education, Skills and Training collect reports from the student associations at each institution, which includes the association's assessment of the existing policy, which recommendations were submitted, and which recommendations were or were not adopted. This information will further support the government in understanding the general climate around campus sexualized violence, which recommendations are being made, as well as clarifying the perspective of those who are most commonly impacted by campus sexualized violence.



PROTECTING CONFIDENTIALITY

As addressed earlier, protecting the confidentiality of survivors/ complainants and respondents is absolutely essential. We recommend that the collective expertise and experiences of key stakeholders in this area be employed to develop a clear set of recommendations on how to best protect confidentiality while making the highest degree of useful information publicly available. As per Government Recommendation 4. a), we recommend that this be included in the development of the rubric.

There are two main categories of information that require confidentiality requirements to be considered: the quantitative data types outlined under the lists under “Mandatory” and “Required if Confidentiality Considerations are Satisfied”, and the qualitative data collected through optional surveys provided to survivors/ complainants on their experience utilizing the policy and services. The confidentiality considerations for the qualitative survey results will require a considerable amount of time and expertise to develop. We maintain that this information is essential to the ongoing work of our institutions, government, communities and campus organizations, as well as to us as student advocates.

WORKING WITH INSTITUTIONS

We want to ensure that institutions are partners in meaningfully addressing, preventing and responding to campus sexualized violence. When Act 23 was first passed, many institutions had to quickly develop policy and procedural responses with little guidance or support, and no direction on how to develop appropriate and consistent practices for the required annual reports to their respective governing bodies. The level of knowledge in these areas amongst institutions, student organizations, and government has increased significantly since Act 23 came into force in 2017, which should be shared and utilized in order to support widespread use of emerging promising practices. We also highly encourage active partnership with all relevant stakeholders in developing the rubric on data collection and public reporting that can be easily interpreted and utilized by institutions.

We recognize that post-secondary institutions across the province have varying levels of capacity to conduct this necessary work, and many are struggling to meet demand with limited financial resources. However, there are many institutions who do have the financial capacity to ensure that the individuals and offices responsible for doing this work are fairly compensated and have the resources available to meet demand. We strongly recommend that all institutions conduct a needs-assessment on addressing, preventing, and responding to campus sexualized violence in consultation with existing staff, on-campus sexualized violence prevention organizations, and student associations, and ensure that proper funding is allocated to prevention, awareness, and response offices according to these results. As a rubric is developed and requirements are established, we encourage the Ministry to continue its efforts to support rural institutions to develop accessible online resources to alleviate these challenges. Furthermore, we want to encourage larger institutions that have greater capacity to conduct this work to be active in supporting their smaller and rural counterparts through ongoing knowledge-sharing.

As institutions have been working to develop their responses to Act 23, student organizations, including student unions, campus constituency organizations, sexualized-violence prevention and response groups, and community-based anti-violence organizations have been actively working to address campus sexualized violence, even before the Act was passed. The level of expertise amongst students is significant, and can provide valuable insight to institutions in developing and implementing survivor-centric and student-focused initiatives in addressing campus sexualized violence. As we all continue to learn and develop promising practices, we want to ensure that opportunities for knowledge-sharing and partnerships are sought out by all parties. The expertise of groups such as the Ending Violence Association of BC, local women's shelters, disability advocacy organizations, local Indigenous community organizations, and 2SLGBTQQIA+ rights organizations, should be actively sought out by institutions to develop ongoing partnerships in their data collection and reporting practices. Consultations of this kind should be done in good faith, recognizing the expertise and lived experiences of those sharing their knowledge, and should be compensated appropriately by institutions for their time and emotional labour.

While community-based and campus anti-violence organizations bring significant first-hand experience in responding to these issues, institutions also have a wealth of knowledge and expertise to offer through their faculty and staff to continue to develop useful reporting practices. The data collected by institutions must be presented in a way that ensures it is useful in assessing the effectiveness of intervention and response strategies over time. The rubric development process should include researchers from institutions who have experience in data collection and reporting, as well as program impact assessment.

Campus sexualized violence cannot be addressed by one sector alone; government, institutions, campus and community organizations, and student associations must all be included in these processes in order to move forward effectively.

CONSIDERING THE LARGER PICTURE

As we move forward in developing more robust and effective mechanisms and standards for data collection and reporting, we must also consider the wider array of areas surrounding campus sexualized violence that need to be addressed. Our response strategies must be developed in consideration of one another, and the interactions of these different issues must also be constantly taken into account. The issues surrounding provincial privacy legislation, the content of institutional sexualized violence policies, the parameters of policy review processes, and additional accountability mechanisms should also be considered alongside our work on data collection and reporting. Just as sexualized violence is a deeply complex issue that is upheld by various interrelated systems of power and oppression, our responses must, likewise, be developed in a holistic manner.

In particular, we want to highlight the ways that provincial privacy legislation must be reviewed and clarified with a trauma-informed and survivor-centric lens. As highlighted in “Moving Beyond Potential” (Spencer and Spicer, 2019), the Personal Information Protection Act (PIPA) is not written with consideration of the needs and rights of survivors of sexualized violence. PIPA is written in a way that is often interpreted by institutions to mean that survivors/ complainants are not

entitled to be informed of the outcomes of an official investigation into an allegation of sexualized violence. The Freedom of Information and Protection of Privacy Act (FIPPA) has also been interpreted by institutions in the same way. The Ending Violence Association of BC has highlighted this as a key concern. The importance of informing complainants of outcomes and sanctions is rooted in principles of human rights law within Canada, specifically within Canadian Victims Bill of Rights, which includes “the right to information, protection, participation, and restitution” (Ending Violence Association of BC, 2016, p. 23). As we have recommended that the outcomes of formal report processes be made publicly available, we also assert that survivors/ complainants have the right to know about the outcomes of investigations and any sanctions that have or have not been implemented against the respondents. These pieces of legislation must be reviewed and clarified to ensure that survivors/ complainants are informed of the outcomes of investigations.



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