

# Report on Sexual Violence Policy Review Feedback

Listening Phase

Office of the Vice-President (Students and Enrolment)  
January 21, 2025

## Overview

The following report is a summary of the feedback received on Carleton's Sexual Violence Policy throughout the listening phase of the consultation work plan.

### Consultation Meetings

Throughout the listening phase of the consultation process, Health and Counselling Services and the Office of Student Affairs met with key stakeholder groups on campus. While every student government and labour union received an invitation to meet, consultation meetings occurred with:

- CUASA
- CUPE 4600
- CUPE 910
- Rideau River Residence Association (RRRA)
- Other individuals as requested

In total, 9 people participated in consultation meetings.

### Information and Feedback Sessions

A total of 15 information and feedback sessions were scheduled for members of the Carleton community including sessions for groups who traditionally experience oppression and marginalization. In cases where there were no registrations within 24 hours before the scheduled information and feedback session, the session was cancelled with a notice that individuals could schedule a consultation meeting or request a new session. In total, 9 sessions took place and 3 people participated.

Information and feedback sessions were scheduled for:

- Staff (online\* and in person)
- Management Staff
- Faculty and Contract Instructors (online and in person\*)
- Students (online and in person)\*
- Graduate Students\*
- Teaching Assistants
- Racialized Students\*
- International Students\*
- Residence Students\*
- Indigenous Students
- 2SLGBTQIA+ Students\*
- Students with Disabilities

*\*Indicates that a session took place.*

The objective of these sessions was to host a supportive space wherein members of the community could provide their feedback on the Sexual Violence Policy. To provide insight into how the feedback from the consultation sessions were conducted, we have included the agenda as an appendix.

### Online Feedback

During the listening phase, there were 17 anonymous form submissions and 3 emailed responses. To ensure anonymity in the feedback received, this online feedback has been summarized within the main themes below.

## Main Themes

Throughout the listening phase of the consultation process, the following themes emerged from the feedback provided:

- **Training and Awareness**
  - Education and Prevention
  - Community Engagement
- **Policy Administration**
  - Definitions and Inclusivity
  - Accountability and Transparency
  - Clarity and Specificity
  - Sexual Violence Review Committee
- **Response**
  - Process and Timelines
  - Reporting and Confidentiality
  - Alternative Resolution Process
  - Investigators
  - False Claims
- **Support and Resources**
  - Support for Complainants and Respondents
  - Accommodations
  - Resources

This report has been organized by these themes and has the aggregated feedback received during the listening phase of the consultation process. This feedback has been examined and assessed in the review of the Sexual Violence Policy. Responses to the feedback received have also been included.

## Training and Awareness

### *Education and Prevention*

- Mandatory training sessions for all members of the university community, including staff, students and faculty
- Develop a certification program for students to complete during their studies
- Training should be trauma-informed and cover the policy comprehensively
- Ensure training is accessible and engaging to encourage participation
- Provide regular refresher courses to keep the community updated on policy changes and best practices
- Outline specific education and prevention initiatives in the policy
- Provide more resources and training for faculty on how to handle disclosures and support students
- Ensure that faculty and staff are aware of their roles and responsibilities under the policy
- Special constables need more training, especially in handling sexual assault cases

### **University Response**

Equity and Inclusive Communities (EIC), in consultation with the Sexual Violence Prevention and Education Committee (SVPEC), is responsible for the development and implementation of the campus sexual violence prevention strategy. Annual reports on its implementation are presented to the Board

of Governors. As noted in section 5.2 (e), the SVPEC is responsible to consider and recommend proposals for new training programs brought forward by EIC and monitor the coordination, implementation and success of training programs related to sexual violence. Feedback from this consultation process in relation to education and training will be provided to EIC and the SVPEC for consideration to enhance their offerings under the campus sexual violence prevention strategy.

Section 5.3 has been added to the Policy to ensure clarity is provided regarding EIC's responsibility in developing and coordinating the University's educational and training initiatives and programs related to sexual violence.

### **Community Engagement**

- Encourage more conversations on consent and awareness of resources
- Consider community guidelines regarding off-campus behaviour and toxic environments in student organizations
- Develop initiatives to engage the community in preventing sexual violence and supporting survivors
- Increase education and training for all involved in the process
- Raise awareness about what constitutes sexual violence and the appropriate responses

### **University Response**

It is the University's commitment to provide and/or make available to members of the University community education and awareness training on this Policy and on the prevention of sexual violence, with content tailored to the audience and relevant to their role and responsibility in responding to and addressing sexual violence. This work falls under the purview of the campus sexual violence prevention strategy. The Sexual Violence Review Committee will provide clearer direction and expectations on the development of educational, training and support services initiatives.

Section 5.3 has been added to ensure clarity is provided regarding Equity and Inclusive Community's (EIC) responsibility in developing and coordinating the University's educational and training initiatives and programs. The feedback collected regarding training and awareness will be shared with EIC and the Sexual Violence Prevention and Education Committee for consideration to enhance their offerings under the campus sexual violence prevention strategy.

## **Policy Administration**

### **Definitions and Inclusivity**

- Add terms like "gender identity," "gender expression," and "age of consent" to the policy definitions
- Include definitions for terms like "transphobia," "trauma-informed approach," and "non-consensual condom removal"
- Update the title to include "Gender-Based Violence" to reflect the scope of the issue and signal inclusivity
- Consider renaming the policy to "Anti-Sexual Violence Policy" for clarity
- Clarify what is not considered sexual violence to avoid misinterpretation

### **University Response**

The Policy addresses intersectionality to ensure that lived experiences and intersectional impacts are considered. Section 1.1 of the Policy includes the following statement: “Carleton acknowledges that individuals who are members of equity-seeking groups who experience intersecting forms of disadvantage based on the protected grounds in the Ontario Human Rights Code may be disproportionately affected by sexual violence and its consequences.” Reference to protected grounds under the Human Rights Code ensures that all possible and legally recognized grounds and groups are covered by the Policy.

Section 2.1(g) recognizes systemic forms of oppression including but not limited to racism, ableism, sexism, transphobia and homophobia. The Policy references related policies under section 12 and are to be read in conjunction with those policies such as Carleton’s Human Rights Policies and Procedures and Workplace Harassment Prevention Policy.

### **Accountability and Transparency**

- Include clear accountability measures for the university in handling sexual violence disclosures and reports
- Provide clear guidelines on the roles and responsibilities of staff involved in the process
- Collect and publish disaggregated data on sexual violence incidents and outcomes
- The policy should be developed with collegial participation and should protect academic freedom

### **University Response**

The Sexual Violence Review Committee has committed to review and enhance guidelines on the intake process so that the survivor is aware of the options available and on the informal and formal complaint process. Clearer guidelines and protocols will be provided to staff within the university on how to support survivors. Specific guidance on how to handle disclosures, interim measures, accommodations, etc. will also be provided.

It is the University’s commitment to provide and/or make available to members of the University community education and awareness training on this Policy and on the prevention of sexual violence, with content tailored to the audience and relevant to their role and responsibility in responding to and addressing sexual violence. This work falls under the purview of the campus sexual violence prevention strategy. The Sexual Violence Review Committee will provide clearer direction and expectations on the development of educational, training and support services initiatives.

Carleton University continues to collect and report on statistics related to sexual violence through six broad categories as required by the Government of Ontario. These statistics are compiled by Equity and Inclusive Communities in collaboration with the Office of the Vice-President (Students and Enrolment) and key stakeholders across campus and are presented annually to the Board of Governors. A copy of the Annual Report on Sexual Violence is available on the sexual violence policy website.

The Sexual Violence Policy undergoes a broad and inclusive consultation process with the entire Carleton community every three years to fulfill the provincial mandate as per Bill 132 and the mandatory revision date as noted in the Policy. Section 5.1 (c) acknowledges academic freedom (as outlined in the applicable collective agreement and in the Carleton University Statement of Conduct and Human Rights) for students, faculty and staff to explore controversial topics related to this issue while contributing to a campus atmosphere in which sexual violence is not tolerated.

### **Clarity and Specificity**

- Simplify the language used in the policy to make it more accessible, especially for neurodivergent individuals
- Include clear definitions for all key terms and concepts
- Provide a plain language roadmap for both students and faculty to understand the process and their roles
- Clarify vague sections of the policy, such as what constitutes a threat to the broader community.
- Use the Oxford comma for clarity
- Ensure the policy covers the production and distribution of intimate images created through generative AI
- Clarify the role of the Sexual Assault Support Centre and EIC

#### **University Response**

Following the consultation process in 2018-2019, the University developed a one-page resource document outlining the reporting process and options for both formal and informal complaints. This continues to be made available on the sexual violence policy website and will continue to be promoted across campus and on appropriate websites.

The provincial government's Bill 26, Strengthening Post-Secondary Institutions and Students Act, added new requirements regarding sexual misconduct towards a student by an employee of a publicly funded university or college. These new requirements came into effect in July 1, 2023.

For clarity, an example on the production and distribution of intimate images created through generative artificial intelligence (AI) has been added to the definition of "Sexual Harassment" in section 4.1.

The Sexual Violence Review Committee has committed to review and enhance guidelines on the intake process so that the survivor is aware of the options available and on the informal and formal complaint process. Clearer guidelines and protocols will be provided to staff within the university on how to support survivors. Specific guidance on how to handle disclosures, interim measures, accommodations, etc. will also be provided.

### **Sexual Violence Review Committee**

- Revise the composition of the Sexual Violence Review Committee (SVRC) to include a diverse group of individuals
- Ensure representation across gender identities, racial backgrounds and equity-seeking groups
- Make the composition and actions of the SVRC more transparent to the university community
- Ensure decision-makers are trained in trauma-informed approaches
- Ensure the SVRC's actions are transparent and scrutinized by the Carleton community
- Replace the SVRC with an expert in sexual violence matters with a trauma-informed approach who would receive, assess and determine whether a matter should proceed through to an investigation

#### **University Response**

Carleton University believes that the best practice for reviewing formal cases of sexual violence is to have a committee review each case following an investigation by a trained, trauma informed investigator. Based on feedback received during the previous consultation process in 2018-2019, a

conflict of interest provision was added as section 8.8. During the 2021-22 consultation process, section 8.8 was further updated to clarify that a party may raise concerns regarding conflict of interest to the General Counsel for review. Further, the Policy states that members of the Sexual Violence Review Committee (SVRC) may have a designate as per section 6.5(c).

Training on sexual violence and procedural fairness that is trauma informed is provided to all members of the SVRC and the appeal board as stated in sections 6.5(c) and 10.2 of the policy. For clarity, the inclusion of training that is trauma-informed has been included in sections 6.5(c) and 10.2. As part of the formal process, Carleton also relies on trained, trauma-informed investigators. Sexual violence training is also provided by Equity and Inclusive Communities. The University is legally responsible for reviewing and making decisions related to sexual violence complaints and senior management individuals have the training, experience, fiduciary responsibility as well as obligations to ensure confidentiality and privacy.

Carleton University continues to collect and report on statistics related to sexual violence through six broad categories as required by the Government of Ontario. These statistics are compiled by Equity and Inclusive Communities in collaboration with the Office of the Vice-President (Students and Enrolment) and key stakeholders across campus and are presented annually to the Board of Governors. A copy of the Annual Report on Sexual Violence is available on the sexual violence policy website.

## Response

### *Process and Timelines*

- Identify specific timelines for actions and decisions to ensure fairness and efficiency
- Provide a step-by-step description of what happens after a disclosure or report is made
- A single centralized officer or administrator should handle policies to ensure consistency and proper training
- Decisions should be made by individuals with no direct relationship to the parties involved
- Interim measures should be proportionate to the situation and should not broadly affect individuals without cause
- Ensure unions are informed and involved in cases involving their members
- All procedures should be subject to grievances and discipline clauses in collective agreements
- Outline reparative actions available to students if their case is mishandled
- Outline the repercussions the respondent might face if they violate the interim measures put in place
- Specify how to report sexual violence if the assailant is in a position of authority
- Include a statement that the university will advise a complainant before it shares information with the respondent (section 8.4)
- Allow for the internal investigation to process regardless of an external proceeding taking place

### **University Response**

Following the consultation process in 2018-2019, the University developed a one-pager resource document outlining the reporting process and options for both formal and informal complaints. This continues to be made available on this website and will continue to be promoted across the campus and on appropriate websites. Further consideration will be given regarding communication and how can these resources be efficiently directed to all university stakeholders.

Section 8.6 of the policy covers timelines and timely progress updates. The university will make every effort to complete the complaint process in a timely fashion without compromising procedural fairness. Each party will receive regular updates on the progress of their case, estimated timeframes and any delays related to the matter. The duration of interim measures and accommodations are determined in accordance with the needs of the survivor, the specific circumstances and the safety of the community.

Section 8.8 includes a conflict of interest provision. Further, the Policy states that members of the SVRC may have a designate as per section 6.5 (c).

Section 9.4 outlines that where the Respondent is a unionized employee, the employee shall have all applicable rights to union representation during any investigatory meetings with the Employer. As noted in section 3.1, the Policy does not replace or supersede existing collective agreement provisions.

Section 9.1(c) has been updated for clarity regarding the suspension of a formal complaint process when jurisdictional or other legal considerations may arise (such as an active police investigation). Continuing with an internal investigation can have a significant impact on the external investigation for both the complainant and the respondent. Regardless of the status of any process, the support, accommodations, and interim and safety measures to complainants will continue to be provided as is detailed in the Policy. For clarity, the support, accommodation and interim and safety measures are available to survivors at any point during the informal or formal complaint process.

### **Reporting and Confidentiality**

- Allow for direct reporting to EIC or HR rather than through the Director of Labour Relations
- Ensure confidentiality and safety for all parties involved

### **University Response**

Section 6 of the Policy outlines disclosures in an emergency (Campus Safety Services) and disclosures in a non-emergency (Equity and Inclusive Communities). Further, as noted in Section 6.1, at any time, a person who has experienced sexual violence may consult with or seek advice and support from the relevant student association, union or other employee group.

Section 7 of the Policy outlines confidentiality. Specifically, that all reports and disclosures of sexual violence to the University will be treated in a confidential manner and in accordance with the Freedom of Information and Protection of Privacy Act (FIPPA) and with the provisions of applicable collective agreements.

Section 8.8 includes a conflict of interest provision. Further, the Policy states that members of the SVRC may have a designate as per section 6.5(c).

### **Alternative Resolution Process**

- Limit the initiation of the Alternative Resolution process to survivors only

### **University Response**

Section 8.10 has been updated to remove the ability of the Respondent to initiate an Alternative Resolution process.



### **Investigators**

- Use external investigators who are culturally competent and diverse
- Define what is determined to be competent in conducting investigations into sexual violence
- Indicate that the investigator must use a trauma-informed approach

#### **University Response**

The Policy requires that formal investigations be conducted by trained investigators. For clarity, the addition of trauma-informed has been included. The investigators ensure that all investigations are conducted in an appropriate and sensitive manner

### **False Claims**

- Include language on how to handle fake, unsubstantiated and malicious complaints
- Require minimal evidence for a complaint to be accepted and initiate investigations only after receiving acceptable evidence
- Ensure that the policy cannot be weaponized by disgruntled students or co-workers

#### **University Response**

Carleton engages and relies on trained, trauma-informed investigators who are capable of identifying false claims if the situation arises. Section 9.1 (d) identifies what must be set out in writing as part of a formal complaint.

## **Support and Resources**

### **Support for Complainants and Respondents**

- Ensure equal access to support and representation for both complainants and respondents
- Clearly outline the consequences for respondents if interim measures are disrespected
- The process should allow for a more natural storytelling approach for complainants rather than starting with an interrogative method, acknowledging that survivors may not have a linear recollection of events
- Include a section on support and services available for respondents including the role of the care and support team
- Create a flow chart as a visual outline of the supports and services available to survivors

#### **University Response**

Section 8.4 has been updated to clarify that either party can contact Ombuds Services for assistance in navigating the provisions of this policy. An update was also made to replace the Manager of Student Conduct and Harm Reduction with a Care and Support Case Manager.

The Sexual Violence Review Committee (SVRC) will ensure that there is a coordinated approach and centralized listing on the sexual violence policy website for all supports available to all parties. Further, the SVRC will provide clearer direction and expectations on the development of educational, training and support services initiatives.

## Accommodations

- Clarify the process for academic and employment accommodations with clear guidance for both complainants and faculty or staff
- Specify if accommodations are managed by EIC or directly by faculty members and outline the steps in requesting them

### University Response

Section 6.5(a) of the Policy outlines interim academic or employment accommodations or other measures that can be put in place when a person reports sexual violence. Further, this section clarifies that when a person reports sexual violence to Campus Safety Services and/or Equity and Inclusive Communities (EIC), they will be provided with the option to be contacted by an EIC Advisor who will offer support and present the options available to them in a timely and supportive way.

Supports from EIC can include a referral to Health and Counselling Services, academic accommodations, employment accommodations, etc. Members of the University community can access accommodations by contacting EIC via email or phone to arrange accommodation support. If a complainant has submitted a formal complaint, they can receive support and accommodation from EIC at any stage of the process.

The Sexual Violence Review Committee will provide clarity on the protocols and guidelines on how to handle academic and employment accommodations. For additional clarity, any employment accommodation must be established through Human Resources or Academic Labour Relations.

## Resources

- Frontline services should be prioritized over the colouring book on the website
- Develop a one-page disclosure document that is easily accessible and widely distributed
- Ensure that support resources are proactively provided to graduate students and other underrepresented groups
- Provide a clear explanation on the various supports that resources provide instead of only contact information

### University Response

Following the consultation process in 2018-2019, the University developed a one-pager document outlining the reporting process and options for both formal and informal complaints. This has been made available on the sexual violence policy website.

Under section 6.2 the web link to additional campus and community-based resources is included. The weblink will allow resources to be updated in between policy review periods. As part of this review, the weblink has been updated to ensure that there is a coordinated approach and centralized listing for all supports available to all parties. This website will be updated over the winter 2025 term.

## Additional Feedback

We received general feedback to update titles, buildings, etc. as follows:

- Update Robertson Hall to Pigiavik (ᐱᐱᐱᐱᐱ)
- Update Director of CSS to Executive Director of CSS
- Update information regarding Emergency Call boxes on campus

- Add calling 4444 from any on-campus phone
- Add that survivors can present in person at CSS

### **University Response**

As part of the regular review of the Policy, updates to names, titles, etc. have been made.

Carleton University is committed to having a survivor-centric policy while ensuring procedural fairness. The University thanks the Carleton community for this feedback as we continue to make draft revisions to the Sexual Violence Policy.

## Appendix A: Information and Feedback Session Agenda

Duration: 1 hour

1. Welcome, land acknowledgement, introductions
2. Word cloud
3. Start, stop, continue
4. Open questions
5. General feedback
6. Closing remarks

### Contextual Note on These Sessions

These information feedback sessions are open to all members of the specified audience. Facilitators for each session are indicated in advance and will facilitate the workshop as folks who are external to the consultation process. Participants are encouraged to actively and respectfully participate in the session and all viewpoints will be considered. Notes will be taken and consolidated into themes presented in aggregate as part of a feedback report.

If support is needed after the workshop, please reach out to one of the [various support and resources](#).

For feedback on the workshop, or anything related to this process, participants can email [svpolicy@carleton.ca](mailto:svpolicy@carleton.ca) or [submit anonymous feedback](#)

