

Privacy Impact Assessment

Sexual Violence and Misconduct Policy Student Consultation

PIA#17-001 (Office of the University Secretariat to assign)

Form adapted from the BC Government template for Non-Ministry Public Bodies. June 2014

Why do I need to do a PIA (Privacy Impact Assessment)?

Section 69(5.3) of the *Freedom of Information and Protection of Privacy Act* (FIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FIPPA. Public bodies should contact the Information Governance Officer to determine internal policies for review and sign-off of the PIA. If you have any questions about this PIA template or FIPPA generally, please contact Adam Cullum (Information Governance Officer) at adam.cullum@unbc.ca or (250) 960-5139 or visit <http://www.unbc.ca/foippa>.

What if my initiative does not include personal information?

Public bodies still need to complete Part 1 of the PIA and submit it along with the signatures pages to Information Governance Officer even if it is thought that no personal information is involved. This ensures that the initiative has been accurately assessed.

Part 1 – General

Name of Department:	Steering Committee on Sexual Violence		
PIA Drafter:	Sexual Violence Steering Committee		
Email:	--	Phone:	--
Program Manager:	Barb Daigle		
Email:	Barb.Daigle@unbc.ca	Phone:	250 960 5235

In the following questions, delete the descriptive text and replace it with your own.

1. Description of the Initiative

As part of developing a Sexual Violence and Misconduct Policy, the Steering Committee on Sexual Violence is consulting with students about their awareness of sexual violence on campus and their opinions about how to prevent and respond to sexual violence. The consultation process will consist of an online consultation questionnaire, and a series of focus groups.

2. Scope of this PIA

The scope of this PIA will cover how the Steering Committee on Sexual Violence will consult with the students online and offline to inform the upcoming Sexual Violence and Misconduct Policy.

3. Related Privacy Impact Assessments

N/A

4. All Elements of Information or Data

Raw data: First name, last name, email address, status as student, type of student, opinions.

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Aggregate data: institutional trends, demographic statistics.

If personal information is involved in your initiative, please continue to the next page to complete your PIA.

If no personal information is involved, please submit Parts 1, 6, and 7 to the Information Governance Officer for review. You will receive support completing the remaining steps of the PIA.

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Part 2 – Protection of Personal Information

In the following questions, delete the descriptive text and replace it with your own.

5. Storage or Access outside Canada

Fluid Surveys houses records in Canada but these records may need to be handled by employees of SurveyMonkey, which is located in the United States of America and Ireland. Participants will provide Informed consent to do the survey before they begin.

Focus group notes will be taken by a research assistant and stored on an internal shared drive. If paper copies are produced, the information will be scanned or typed into electronic format and aggregate data is managed on an internal shared drive provided for this research.

6. Data-linking Initiative*

In FIPPA, "data linking" and "data-linking initiative" are strictly defined. Answer the following questions to determine whether your initiative qualifies as a "data-linking initiative" under the Act. If you answer "yes" to all 3 questions, your initiative may be a data linking initiative and you must comply with specific requirements under the Act related to data-linking initiatives.

1. Personal information from one database is linked or combined with personal information from another database;	no
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	no
3. The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.	no
If you have answered "yes" to all three questions, please contact the Information Governance Officer to discuss the requirements of a data-linking initiative.	N/A

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7. Common or Integrated Program or Activity*

<p>In FIPPA, “common or integrated program or activity” is strictly defined. Answer the following questions to determine whether your initiative qualifies as “a common or integrated program or activity” under the Act. If you answer “yes” to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.</p>	
1. This initiative involves a program or activity that provides a service (or services);	no
2. Those services are provided through: (a) a public body and at least one other public body or agency working collaboratively to provide that service; or (b) one public body working on behalf of one or more other public bodies or agencies;	no
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	no
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	N/A

** Please note: If your initiative involves a “data-linking initiative” or a “common or integrated program or activity”, advanced notification and consultation on this PIA must take place with the Office of the Information and Privacy Commissioner (OIPC) as well. Contact the Information Governance Officer to determine how to proceed with this notification and consultation in the early stages of developing the initiative, program or activity.*

8. Personal Information Flow Diagram and/or Personal Information Flow Table.

Personal Information Flow Table (Online Consultation)			
	Description/Purpose	Type	FIPPA Authority
1.	Fluid Surveys administration settings are set to avoid tracking IP addresses.	Protection	30
2.	The Survey Administrator invites students to participate in a Sexual Misconduct and Violence Consultation. The Survey Administrator requests a CSV file containing the email addresses of all students to be made. The Survey	Collection & Use	26(e), 32(a)

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	<i>Administrator exports the CSV file to FluidSurveys to create individual invite only codes to prevent duplication of submissions and prevent submission from individuals that are not students.</i>		
3.	<i>Students voluntarily complete the Sexual Violence and Misconduct Consultation. Raw data is created by each student's submission.</i>	Collection	26(e)
4.	<i>The raw data from submissions is aggregated and if demographic data creates a group of individuals low enough in number to become identifiable, that demographic data will not be accounted for. Aggregate data will be placed in a shared drive folder along with resulting reports and methodology.</i>	Use & Protection	30, 32(b)
5.	<i>The research assistant will not remove raw identifiable data contained in Fluid Surveys and the Wellness Centre Manager will ensure that the raw data is deleted from Fluid Surveys after the aggregate reports are complete. The data collected will not be used by UNBC to make a decision about the student submitting their opinions. The records do not need to be kept for a year unless the researcher has a legal or ethical duty to report individual submissions.</i>	Disposition	31
6.	<i>The Wellness Centre manager will evaluate how the research assistant is aggregating the raw data to ensure appropriate information is extracted.</i>	Disclosure	33.1(1)(e)(i)
7.	<i>The Wellness Centre manager will review the aggregate data and generate a report that will extract trends to highlight to the committee. The committee will review the aggregate report and provide feedback and questions. The report will be forwarded to the Associate VP of People/Org Design/Risk to inform the Sexual Violence and Misconduct Policy.</i>	Use	32(b)
8.	<i>Aggregate reports will be retained to provide evidence that consultation has occurred. Aggregate reports will be retained until the next review of the Sexual Violence and Misconduct Policy.</i>	Disposition	-- (Choice of committee)

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Personal Information Flow Table (Focus Group Consultation)			
	Description/Purpose	Type	FIPPA Authority
1.	Students attend one of the focus groups and the research assistant takes notes about common trends found in the answers to the focus group questions. The analysis measures population rather than individual experience to protect privacy. While the location of the focus group can be recorded, the names of participants cannot.	Collection & Protection	26(e), 30
2.	Raw personally identifiable data is not generated as it is aggregated in the process of notetaking. The Wellness Centre manager will review the aggregate data and generate a report that will extract trends to highlight to the committee. The committee will review the aggregate report and provide feedback and questions. The report will be forwarded to the Associate VP of People/Org Design/Risk to inform the Sexual Violence and Misconduct Policy.	Protection & Use	30, 32(b)
3.	Aggregate reports will be retained to provide evidence that consultation has occurred. Aggregate reports will be retained until the next review of the Sexual Violence and Misconduct Policy.	Disposition	-- (Choice of committee)

9. Risk Mitigation Table

Please identify any privacy risks, even very unlikely ones, associated with the initiative and the mitigation strategies that will be implemented. Please provide details of all such strategies. Also, please identify the likelihood (low, medium, or high) of this risk happening and the degree of impact it would have on individuals if it occurred.

Examples can be removed and additional lines added as needed.

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.				

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2.	
3.	

COMMITMENT

10. Collection Notice

Consultation with UNBC Students Regarding Sexual Violence and Misconduct

Introduction

The University of Northern British Columbia recognizes that victims and survivors of sexual violence can be deeply impacted by their experiences. The President's Task Force on Sexual Violence generated a series of recommendations intended to develop a healthier and safer work and study environment. To implement one of these recommendations - the development of a Sexual Violence & Misconduct policy - the Steering Committee on Sexual Violence is consulting with students about their awareness of sexual violence and the resources on campus available to them. The questions asked as part of this consultation could potentially cause some participants to relive traumatic memories of sexually violent experiences.

If you experience any unexpected negative thoughts or feelings after completing the survey, or if you are currently experiencing sexual violence, there is help available. Please contact the following confidential services:

- On Campus: UNBC Counselling – extension 26369 or 250-960-6369
- Off Campus: Crisis Line – 250-563-1214
- Community Care Counselling – 250-960-6457
- SOS (Sexual Assault Centre) – 250-564-8302
- Elizabeth Fry Society (PG & District) – 250-563-1113

This consultation consists of a series of closed questions. The length of time it will take to complete will vary for each participant but the consultation has been designed to require as little time as possible.

To collect your demographic data and opinions, we need your informed consent. The next section explains how your information will be handled by UNBC.

[NEXT]

University of Northern British Columbia
UNBC Steering Committee on Sexual Violence

Consent for the Collection, Use and Disclosure of Personal Information Collected Through Fluid Surveys.

I hereby consent to the University of Northern British Columbia Wellness Centre Manager allowing the Survey Administrator and Research Assistant working with the Wellness Centre Manager to collect my demographic information (including gender identity, status as student, and type of student), along with my opinions found in my answers to the following questions through the use of FluidSurveys. The Wellness Centre Manager is collecting this information on behalf of the UNBC Steering Committee on Sexual Violence for the purpose of compiling aggregate data to use as a tool to evaluate UNBC's current practices around awareness, education, prevention and response to acts of sexual violence. The University of Northern British Columbia will use the aggregate data to inform a Sexual Violence and Misconduct Policy. UNBC collects the personal information above as per section 26(e) of the Freedom of Information and Protection of Privacy Act RSBC 1996 c. 165.

The UNBC Steering Committee on Sexual Violence will not consciously disclose specific details collected from your submission to external parties unless required to by law. The Survey Administrator will be able to access data, but will not access my submission unless I request in writing to have a correction made to my submission. The raw data containing identifiable personal information will be analyzed by the research assistant assigned and the Wellness Centre Manager in order to evaluate the work of the research assistant. In the process of severing information for a Freedom of Information request, the Information Governance Officer may need to access raw data. A Freedom of Information request may result in statistics being released publically.

Some security measures taken to protect personal information put into my submission cannot be controlled by UNBC because FluidSurveys is an external service. I understand that because FluidSurveys is owned by the international company SurveyMonkey there is a chance that my personal information provided in my submission may be intercepted by international third parties or collected as part of US or Ireland's federal or state legal requirements even though the data is stored on Canadian servers. I understand that UNBC cannot control unauthorized disclosure of information occurring outside of UNBC's servers.

I understand that FluidSurveys manages my personal information as indicated in their privacy policy found at <http://fluidsurveys.com/about/privacy> and terms of service found at <http://fluidsurveys.com/about/terms> which I am responsible for reading.

By continuing, I accept how this consultation collects, uses, stores, discloses, and disposes of the information I provide. By continuing I indicate that I am comfortable and willing to proceed with reading and answering the questions. If I have any questions regarding UNBC's management of my

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personal information in this consultation, I can contact Sarah Hanson, Wellness Centre Manager at Sarah.Hanson@unbc.ca or 250-960-6362.

By selecting ACCEPT below, I accept this consent notice in its entirety as written. If I select refuse, I agree that I cannot participate in order to protect myself from terms of this agreement that I cannot accept.

ACCEPT

REFUSE (Return to first page)

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University of Northern British Columbia

UNBC Steering Committee on Sexual Violence

Consent Notice Talking Points Reviewed Before the Beginning of Each Focus Group.

(Note: These points will not be read verbatim but the points need to be addressed in the preamble before starting each focus group.)

- The Steering Committee on Sexual Violence is collecting participants' opinions in the focus group questions to inform a Sexual Violence and Misconduct Policy.
- The research assistant will not be noting any information that associates an individual's opinions and experiences to that individual. The research assistant will be highlighting trends when she writes notes.
- The focus group facilitators need to highlight at least one resource available to disclose and report acts of sexual violence.
- The focus group facilitators need to request any personal information or experiences brought up in the focus group be contained to the focus group.
- The focus group facilitators must explain that confidentiality cannot be assured because the other participants may disclose what an individual says in the focus group.

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Part 3 – Security of Personal Information

Please consult with the Information Governance Officer, the Chief Information Officer or the IT Security Officer when filling out this section if you have any questions.

11. Please describe the physical security measures related to the initiative (if applicable).

[Redacted]

12. Please describe the technical security measures related to the initiative (if applicable).

[Redacted]

13. Does your department rely on any security policies? If so, indicate here:

[Redacted]

14. Please describe any access controls and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information.

[Redacted]

15. Please describe how you track who has access to the personal information.

[Redacted]

Part 4 – Accuracy/Correction/Retention of Personal Information

16. How is an individual's information updated or corrected? If information is not updated or corrected (for physical, procedural or other reasons) please explain how it will be annotated. If personal information will be disclosed to others, how will the public body notify them of the update, correction or annotation?

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Students will be able to contact the Wellness Centre Manager who will communicate with the survey administrator (before the survey closes) or the research assistant (after the survey closes) to ensure changes are made if possible. After aggregation of the online consultation is complete, the Wellness Centre manager will assess the request for correction and determine if the correction will add to the aggregate data and make an anonymous addition to the data as necessary.

All requests for correction will be deleted as soon as they are resolved because the corrections to these opinions will not directly impact the individual.

17. Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain.

No.

18. If you answered "yes" to question 17, please explain the efforts that will be made to ensure that the personal information is accurate and complete.

N/A – Students can choose to contact the Wellness Centre Manager if they perceive inaccuracies to their demographic information or opinions. The change will be anonymized as it is applied to the aggregate data and any record of the request for correction will be deleted.

19. If you answered "yes" to question 17, do you have a records retention and/or disposition schedule that will ensure that personal information is kept for at least one year after it is used in making a decision directly affecting an individual?

N/A – Information will only be retained on FluidSurveys until the data is aggregated unless a case-by-case legal or ethical reason prevents a portion of the data from being deleted. Aggregate data will be retained until the next review of the Sexual Violence and Misconduct Policy.

Part 5 – Further Information

20. Does the initiative involve systematic disclosures of personal information? If yes, please explain.

N/A

Please check this box if the related Information Sharing Agreement (ISA) is attached. If you require assistance completing an ISA, please contact the Information Governance Officer.

N/A

21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

N/A

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Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact the Information Governance Officer, the UNBC Research Office or UNBC Archives.

N/A

22. Will a personal information bank (PIB) result from this initiative? If yes, please list the legislatively required descriptors listed in section 69 (6) of FIPPA. Under this same section, this information is required to be published in a public directory.

No.

Please ensure Parts 6 and 7 are attached to your submitted PIA.

Part 6 – Comments, Concerns & Conditions

This PIA is based on a review of the material provided to the Information Governance Officer as of the date below. If, in future any substantive changes are made to the scope of this PIA, the public body will have to complete a PIA update and submit it for approval.

Data collection, storage, use, disclosure and disposal must be conducted using methods that minimize the association of opinions and experiences with individual students. Data collection and analysis will need to focus on isolating population trends rather than individual experiences.

The consultation questions are attached to this PIA as Appendix A.

The focus group questions are attached to this PIA as Appendix B.

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Part 7 – Program Area Signatures

Steering Committee on Sexual
Violence

N/A (Meeting Notes Confirm
Discussion)

N/A

Name of Individual leading the
Program/Project
*(Normally the individual who
completed the PIA)*

Signature

Date

Barb Daigle

Director or Dean Overseeing the
Program/Project

S

Jan 31/17

Date

N/A

Contact Responsible for Systems
Maintenance and/or Security
(if applicable)

Signature

Date

N/A

N/A

Adam Cullum

Information Governance Officer

Signature

Jan 31/17

Date

Once the PIA has been approved with or without conditions, the Information Governance Officer will collect signatures from the individuals indicated above. A copy will be provided to all signatories for convenience or to attach to a requisition or file with a contract.

A final copy of this PIA (with all signatures) will be kept on record with the Information Governance Officer.

Appendix A: Consultation Questions

Demographic Information:

1. Gender ____
2. Undergraduate student ____ Graduate student ____

For the purpose of this survey:

Sexual Violence means any unwanted act, physical, verbal or psychological, carried out through sexual means or by targeting sexuality. It recognizes that there are many different forms of sexual violence, including sexual assault, sexual abuse, sexual harassment, stalking, indecent or sexualized exposure, degrading sexual imagery, voyeurism, cyber harassment and cyber stalking, trafficking and sexual exploitation."

"Disclose" means telling someone about what has happened.

- 3a) Are you aware of resources that are available on campus to allow victims/survivors and witnesses to safely and confidentially **DISCLOSE** experiences of sexual violence occurring on campus or in residence?

Yes

No – [leads to 4a]

- 3b) Please select the first resource on campus that you would use to **DISCLOSE** an act of sexual violence out of the choices below?

- A faculty member (instructor, professor)
- Security
- Student Union Representative (NUGSS/GSS)
- Pride Centre
- Women's Centre
- Human Resources
- First Nations Centre
- International Education Office
- Counsellor at Wellness Centre
- Nurse or Doctor at Wellness Centre
- Registrar's Office
- Academic Success Centre
- Student Life Team
- Residence Life Team (RA's, Residence Life Coordinators)
- Other (please specify) _____ (Limit of 40 characters)
- I would use an off campus resource

“Report” means making an official or formal report to authorities

4a) Are you aware of resources that are available on campus to allow victims/survivors and witnesses to **REPORT** experiences of sexual violence in a safe environment?

Yes

No – [leads to 5]

4b) Please list the first resource on campus that you would use to **REPORT** an act of sexual violence out of the choices below?

- A faculty member (instructor, professor)
- Security
- Student Union Representative (NUGSS/GSS)
- Pride Centre
- Women’s Centre
- First Nations Centre
- International Education Office
- Human Resources
- Counsellor at Wellness Centre
- Nurse or Doctor at Wellness Centre
- Registrar’s Office
- Academic Success Centre
- Student Life Team
- Residence Life Team (RA’s, Residence Life Coordinators)
- Other (please specify) _____ (Limit of 40 characters)
- I would use an off campus resource

5) Out of the selections below, what would be the most effective way for UNBC to raise awareness around how students can disclose or report acts of sexual violence they experience or witness?

- Frequently Asked Questions posted on UNBC’s website
- Frequently Asked Questions available in print
- Emails sent to UNBC email addresses advertising resources and events
- Social Media Posts Advertising Resources (facebook, twitter, Instagram)
- Scheduled in person training and education sessions with targeted groups
- Live Events on Campus to Raise Awareness
- Tables in the Agora containing information materials
- Weekly Information Sessions for students to learn more about sexual violence
- Information brochures available in all student service locations
- None of these choices would be effective to me

6) Out of the selections below, what would be the most effective way for UNBC to develop strategies to reduce or prevent sexual violence on campus?

- Frequently Asked Questions posted on UNBC's website
- Frequently Asked Questions available in print
- Emails sent to UNBC email addresses advertising resources and events
- Social Media Posts Advertising Resources (facebook, twitter, Instagram)
- Scheduled in person training and education sessions with targeted groups
- Live Events on Campus to Raise Awareness
- Tables in the Agora containing information materials
- Weekly Information Sessions for students to learn more about sexual violence
- Information brochures available in all student service locations
- None of these choices would be effective to me

7) From your perspective, which of the choices below is the most effective way for UNBC to reduce the incidents of sexual violence on campus and in residence?

- Frequently Asked Questions posted on UNBC's website
- Frequently Asked Questions available in print
- Emails sent to UNBC email addresses advertising resources and events
- Social Media Posts Advertising Resources (facebook, twitter, Instagram)
- Scheduled in person training and education sessions with targeted groups
- Live Events on Campus to Raise Awareness
- Tables in the Agora containing information materials
- Weekly Information Sessions for students to learn more about sexual violence
- Information brochures available in all student service locations
- None of these choices would be effective to me

8) From your perspective, which of the choices below is the most effective way to ensure UNBC continues to address prevention of sexual violence?

- Frequently Asked Questions posted on UNBC's website
- Frequently Asked Questions available in print
- Emails sent to UNBC email addresses advertising resources and events
- Social Media Posts Advertising Resources (facebook, twitter, Instagram)
- Scheduled in person training and education sessions with targeted groups
- Live Events on Campus to Raise Awareness
- Tables in the Agora containing information materials
- Weekly Information Sessions for students to learn more about sexual violence
- Information brochures available in all student service locations
- None of these choices would be effective to me

Thank you for taking part in this survey.

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Appendix B: Focus Group Questions

Definitions of terms will be posted at each session to help students answer the focus group questions.

“Disclose” means telling someone about what has happened.

“Report” means making an official or formal report to authorities.

- 1a) UNBC is currently establishing and implementing a Sexual Violence and Misconduct Policy. What does the term “sexual violence” mean to you?
- 1b) From your perspective, what types of situations or experiences can be defined as sexually violent?
- 2a) What are all of the resources on campus that you are aware of where you can **DISCLOSE** experiencing or witnessing sexual violence?
- 2b) What barriers do you see that prevent an individual from accessing resources to **DISCLOSE** an experience of sexual violence on campus?
- 2c) From your perspective, what are some solutions to overcoming barriers to **DISCLOSE** an experience of sexual violence on campus?
- 3a) What are all of the resources on campus that you are aware of where you can **REPORT** experiencing or witnessing sexual violence?
- 3b) What barriers do you see that prevent an individual from accessing resources to **REPORT** an experience of sexual violence on campus?
- 3c) From your perspective, what are some solutions to overcoming barriers to **REPORT** an experience of sexual violence on campus?
- 4) From your perspective, what can UNBC do to reduce the incidents of sexual violence on campus and in residence?
- 5) What strategies need to be implemented to ensure UNBC is addressing prevention of sexual violence?
- 6) From your perspective, what else does UNBC need to include in a Sexual Violence and Misconduct policy as it pertains to students?

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