

 CAPILANO UNIVERSITY		POLICY	
Policy No.	Officer Responsible		
B.401	President		
Policy Name			
Sexual Violence Policy			
Approved by	Replaces	Category	Next Review
Board			September 2023
Date Issued	Date Revised	Related Policies, Reference	
April 18, 2017	September 29, 2020	B.401.1 (Sexual Violence Procedures) B.511 (Discrimination, Bullying and Harassment Policy) E.407 (Violence in the Workplace Policy) B.310 (Protected Disclosure (Whistleblower) Policy) B.512 (Human Rights, Diversity, Inclusion and Equity) B.506 (Standards of Conduct) B.701 (Student Code of Conduct Policy) B.311 (Employee-Student Relationships) <i>Sexual Violence and Misconduct Policy Act, SBC 2016 c.23</i> <i>Freedom of Information and Protection of Privacy Act, RSBC 1996, c.165</i> <i>Human Rights Code, RSBC 1996, c.210</i> <i>Workers' Compensation Act, RSBC 1996, c.492</i>	

1. PURPOSE

- 1.1. Capilano University (the “University”) is committed to creating and maintaining a safe working, learning, and living environment that aims to prevent and respond to sexual violence. The University recognises that safety may look different based on lived experiences.
- 1.2. The purpose of this policy is to outline how the University will address sexual violence and to identify institutional, collective, and individual responsibility in creating and maintaining an environment that reduces sexual violence and creates safer access for survivors to disclose

and report.

1.3. Sexual violence is not tolerated or condoned by the University.

2. PREAMBLE

2.1. The University commits to proactive measures for sexual violence response, prevention and education strategies that are guided by de-colonial, intersectional, accessible, culturally grounded, survivor centered and trauma and violence informed methods, and informed by *The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls* and *Truth and Reconciliation Report*.

2.2. The University commits to taking an approach to sexual violence response, prevention and education that recognizes the complexity of harm, histories of institutional harm and the power dynamics within a University community that create barriers to disclosing and reporting.

2.3. The University acknowledges that sexual violence is a systemic issue that impacts all members of society. The University acknowledges that sexual violence impacts people differently, and that social groups who experience intersecting forms of discrimination (on the basis of race, ethnicity, gender identity or expression, sex, sexual orientation, dis/ability or religion) may experience higher rates of sexual violence.

2.4. The University commits to collaboration with on and off campus partners in order to create a coordinated and relational approach to sexual violence response, prevention and education efforts on campus.

2.5. The University commits to providing designated funding for sexual violence support and educational resources.

2.6. The University will develop a Sexual Violence Advisory Committee made up of members of the University community including students. The advisory committee will be chaired by a designate of the Office of Student Affairs and will meet quarterly to provide guidance on the implementation of this policy and will report annually in alignment with the requirements of the *BC Sexual Violence and Misconduct Policy Act*. The advisory committee will not advise on individual cases.

2.7. The University commits to giving agency, choice and options to members of the University community impacted by sexual violence, and that those impacted by sexual violence will be treated with dignity, respect and compassion and provided with accessible, timely and confidential support. This includes support for witnesses, bystanders and people that have caused harm.

3. DEFINITIONS

- 3.1. **“Accommodation”** is the process or action by which reasonable arrangements are made to support the academic, employment, health, well-being and safety needs of a member of the University community impacted by sexual violence.
- 3.2. **“Appeal”** means the request by a student for the University to reconsider a decision that has been made regarding the outcome of an investigation. Students may appeal decisions for a variety of reasons. Please see the Student Appeals Policy (B.109) for more information.
- 3.3. **“Balance of Probabilities”** means the standard of proof used to determine findings of fact, requiring the evidence shows that the sexual violence that has been reported is more likely to have occurred than not.
- 3.4. **“Complainant”** means a survivor of sexual violence who has chosen to file a report under this policy and its associated procedures.
- 3.5. **“Confidential Information”** means all information provided when a survivor discloses or reports and all information related to an investigation or outcome under this policy and its associated procedures.
- 3.6. **“Consent”** means an active, direct, voluntary, and conscious choice and agreement between adults to engage in physical or sexual activity. It is the responsibility of the person initiating or pursuing physical or sexual activity to obtain consent at all stages of physical or sexual engagement. More specifically, consent:
 - 3.6.1. is a freely given “yes”;
 - 3.6.2. cannot be assumed or based on a perception that it was implied;
 - 3.6.3. cannot be given by someone who is incapacitated (by drugs and/or alcohol), asleep, unconscious, or otherwise incapable of providing consent;
 - 3.6.4. can be removed at any time, regardless of whatever other physical or sexual activities have taken place;
 - 3.6.5. can never be obtained through threats, intimidation, coercion or other pressure tactics;
 - 3.6.6. cannot be obtained if someone abuses a position of trust, power or authority, and
 - 3.6.7. cannot be assumed from previous consent to physical or sexual activities.
- 3.7. **“Disclose”** or **“Disclosing”** means the sharing of information by a member of the University community regarding an incident of sexual violence with a member of the University community in order to access support only. A disclosure can be made without a formal report to the University.

- 3.8. **“Duty of Care Committee”** means a representative team of core decision-makers who will review incidents of at-risk and violent behavior through risk and threat assessment methods and, where appropriate, initiate investigations and make recommendations.
- 3.9. **“Employee”** means any person employed by the University.
- 3.10. **“Incapacitated”** means a person does not have the capacity to give consent. This could be because the person is impaired by drugs or alcohol, is asleep or unconscious, is experiencing a trauma response, or due to another mental or physical health issue that significantly inhibits a person’s capacity.
- 3.11. **“Intersectional”** means the ways in which a person’s lived experiences are shaped by different social positions that can result in privilege and/or oppression (e.g. race, ethnicity, gender identity or expression, sex, sexual orientation, dis/ability, or religion).
- 3.12. **“Investigation”** is an investigation carried out by the University in accordance with the associated procedures. Investigations may be conducted by an external investigator on behalf of the University.
- 3.13. **“Member of the University Community”** means employees, students, contractors, subcontractors, agents, board members and volunteers.
- 3.14. **“No-Contact Requirement”** means a University requirement that an individual refrain from contacting an individual based on specified conditions (e.g. a no-contact requirement may restrict a respondent’s contact with a complainant or witness).
- 3.15. **“Online Activity”** means online forms of communication including email, text, online files, social media, pictures and videos that can be shared via websites, apps, and/or through social networking platforms.
- 3.16. **“Rape Culture”** is a prominent culture that normalizes and trivializes sexual violence, often through victim blaming. This is often perpetuated through institutions, media, education, healthcare, and/or legal systems.
- 3.17. **“Report”** or **“Reporting”** means a formal report of an incident of sexual violence made by a member of the University community for the purpose of initiating some form of investigation by the University. This is not the same as disclosing, which does not initiate a formal process. This is also not the same as making a report to law enforcement or other reporting mechanisms outside of the University.
- 3.18. **“Respondent”** means a member of the University community against whom a report of sexual violence has been made under this policy and its associated procedures.
- 3.19. **“Restorative Justice”** means a facilitated, accountability and healing process by which reconciliation between harmed parties takes place in order to address harm.
- 3.20. **“Retaliation”** means any action or threatened action that threatens, intimidates or harasses a person or their working, learning or living environment, taken or made through any

means, including through online activity, with anyone who engages with this policy and its associated procedures.

- 3.21. **“Safety”** means the state of being safe from experiencing harm or injury. This may include physical, emotional, financial or spiritual harm in relation to sexual violence. Safety needs may look different for everyone based on lived experiences and identity.
- 3.22. **“Sexual Assault”** is any form of unwanted sexual contact that occurs without ongoing and freely given consent, including the threat of sexual contact without consent. Sexual assault can include any form of unwanted touching, kissing, groping, fondling, forced sexual activity (including oral and anal), and attempted forced sexual intercourse. Sexual assault can be perpetrated by a stranger, someone known to the survivor, by an intimate partner or others(s). Anyone can perpetrate sexual assault, and anyone can be a survivor of sexual assault. Sexual assault is the legal term used in Canada and is a crime.
- 3.23. **“Sexual Harassment”** is a comment, conduct or representations of a sexual nature, including sexual advances, requests for sexual favours, suggestive comments or gestures, or physical contact by a person who knows, or ought reasonably to know, that the conduct or comment is unwanted or unwelcome. The behavior interferes with another person’s participation in a University-related activity; or leads to or implies employment or academically-related consequences for the person harassed; or creates an intimidating, humiliating or hostile environment.
- 3.24. **“Sexual Violence”** is an umbrella term that encompasses a broad range of sexual behaviour, whether physical or psychological, that is committed, threatened or attempted against a person without the person’s consent. It takes many forms including, but not limited to: sexual assault, sexual exploitation, sexual harassment, stalking, indecent exposure, voyeurism, distribution of sexual images or video of a person(s) without their consent, stealthing, and online activity including online harassment or online stalking of a sexual nature.
- 3.25. **“Sex Work”** is a consensual profession and choice to engage in sexual activity for financial gain. Sex workers have the ability to consent or not consent to any form of sexual activity. Sex work is not sexual exploitation.
- 3.26. **“Student”** means an individual enrolled in any course (credit or non-credit) at the University.
- 3.27. **“Survivor”** means a member of the University community who has experienced sexual violence. Survivors who choose to report may also be referred to as ‘complainants.’
- 3.28. **“Third Party Report”** is a process that allows survivors to anonymously report an incident of sexual assault to police through a third-party community based victim services program.
- 3.29. **“Transformative Justice”** is a non-punitive social justice process that seeks to address the root causes of harm in order to restore relationships and communities. It is a process that supports all impacted community members, not just survivors or respondents, and

addresses culture change.

- 3.30. **“Trauma and Violence Informed Approach”** means an understanding of the impacts of sexual violence on individuals, families, communities and places, including intergenerational trauma. A trauma and violence informed approach uses that understanding to develop practices that minimize further harm, foster healing and honor strength and resiliency. A trauma and violence informed approach recognizes historical trauma and promotes systemic change rooted in resilience, not re-victimization.
- 3.31. **“University premises”** means any University owned or rented/leased lands, facilities, or conveyance.
- 3.32. **“University-related Activity”** includes an activity or event conducted under the authority of the University at any location, on or off campus. This can include field schools, practicums, film and theatre sets, distance and online learning, athletic trips, away games or alumni events.
- 3.33. **“Witness”** refers to a person who is identified by the survivor or respondent as having additional relevant information regarding an incident of sexual violence. This can include a bystander.
- 3.34. **“Visitor”** means non-University community members who are visiting any University premises or engaging in a University-related activity. This includes alumni and donors.

4. CONFIDENTIALITY AND PRIVACY

- 4.1. Confidentiality is an important principle in creating an environment where survivors feel safe to disclose, report and seek support.
- 4.2. The information and records created and received to administer this policy are subject to the access to information and protection of privacy provisions of the BC *Freedom of Information and Protection of Privacy Act* (“FIPPA”).
- 4.3. The University will share identifying information only in situations where it is necessary in order to respond to safety concerns or to a legal reporting requirement, as authorized by the President. In these circumstances, the University will disclose to survivors, respondents or witnesses that this identifying information is being shared, and do so within a timely manner in order to address any concerns and set up reasonable safety and support measures as needed. The University will also try to share the minimum amount of information to satisfy the safety concern or legal requirement.

Circumstances may include:

- 4.3.1. when a person is at risk of harm to self;
 - 4.3.2. when a person is at risk of harming others;
 - 4.3.3. there are reasonable grounds to be concerned of future risk or violence to members of the University community and/or broader community;
 - 4.3.4. disclosure is required by law (e.g. suspected abuse of someone under the age of 19);
 - 4.3.5. compliance with the *Workers' Compensation Act*, *Human Rights Code* or civil action);
 - 4.3.6. reliable information of the disclosed incident of sexual violence is available in the public domain (e.g. images or video on social media);
 - 4.3.7. to comply with the reporting requirements of regulatory bodies.
- 4.4. The University will share confidential information in order to ensure that the reporting processes listed are fairly conducted, in accordance with the following principles:
- 4.4.1. The respondent has the right to know the pertinent details of the complaint, including the identity of the person who made the report (the complainant). However, the identity of the complainant will be withheld until a risk assessment has taken place to protect the health and safety of the complainant. A risk assessment will be done promptly as to not delay the process.
 - 4.4.2. The complainant has the right to know the outcome of the investigation, but not the details of any sanctions that may have been applied to the respondent unless sharing that information is necessary for the protection of the complainant's health or safety; and
 - 4.4.3. Other persons do not have the right to know any confidential information except to the extent required to conduct an investigation or as required by law.
- 4.5. Unauthorized release of confidential information is a violation of this policy, may violate *FIPPA*, may deter survivors from coming forward and may prevent the University from conducting a fair process when a report is made.

5. SCOPE AND JURISDICTION

- 5.1. This policy applies to all members of the University community.
- 5.2. Any member of the University community who has experienced sexual violence can access confidential assistance and support, accommodations, referrals and information from the Office of Student Affairs or Human Resources regardless of the time or place at which the sexual violence occurred.

- 5.3. Visitors to University premises or University-related activities who experience sexual violence whilst on University premises can access support, information and referrals to off campus resources from the Office of Student Affairs.
- 5.4. The University has the jurisdiction to address reports made against a member of the University community and can take action to the extent of its relationship to that member where the incident occurred:
 - 5.4.1. on University premises;
 - 5.4.2. at a University-related activity; or
 - 5.4.3. when the respondent was in a position of power or influence over the survivor's academic or employment status.
- 5.5. The University reserves the right to take necessary and appropriate action to protect the safety and welfare of the campus community and the working, learning and living environment. This may include taking necessary and appropriate action in cases where a member of the University community is accused of sexual violence and there is a clear connection to the University community regardless of where the misconduct occurred.
- 5.6. The University has no jurisdiction to investigate reports made against an individual who is not a member of the University community, but will make every effort to ensure survivors and witnesses are provided with support, referrals and information on reporting externally. In certain circumstances, the University may be able to restrict the accused individual's access to University premises and request no contact to impacted members of the University community.
- 5.7. All survivors who are members of the University community have the right to pursue criminal and/or civil legal remedies and exercise any other legal rights they may have, including the right to file a complaint with the BC Human Rights Tribunal, whether or not they choose to make a report under this Policy.
- 5.8. All members of the University community have the right to not report or to withdraw a report at any time.
- 5.9. Survivors may choose to file an anonymous third-party report to a community-based service and can be supported by the Office of Student Affairs or Human Resources in doing so.
- 5.10. This policy and its' associated procedures are separate from any criminal or civil proceedings. The University is responsible for determining whether a member of the University community has violated this policy and is not responsible for determining violations of criminal or civil law. The University may elect to suspend its internal process

until the outcome of the process outside the University is determined. The University will, to the extent possible, ensure that safety measures are implemented for survivors engaged in criminal or civil proceeding and will cooperate in any criminal investigation with the survivor's consent, or when legally required to do so.

- 5.11. The University may accept a disclosure or a report from person seeking to become a member of the University community in circumstances that directly affect their application or safe entry in becoming a member, and from former members of the University community in circumstances directly affecting their departure from the University. In these circumstances there may not be jurisdiction for an investigation.

6. EDUCATION AND TRAINING

- 6.1. The Office of Student Affairs and Human Resources will work in collaboration with the Capilano Student's Union (CSU) and other on and off campus partners to develop and implement an education and prevention plan that is based on evidence informed approaches, research and subject matter advice. This education plan will be guided by de-colonial, intersectional, accessible, culturally grounded, survivor-centered and trauma and violence informed methods.
- 6.2. This education and prevention plan will guide what education and training is implemented on campus for all members of the University community and reported on annually.
- 6.3. All members of the University community will receive information and training about this policy and its associated procedures.
- 6.4. Education and training will be tailored to meet the needs of the audience based on roles and responsibilities at the University.
- 6.5. Any first responders who are likely to receive a disclosure, will receive training on how to respond.
- 6.6. Members of the University community who are responsible for formally receiving disclosures, reports, conducting investigations or making outcome decisions, will receive specialized training.
- 6.7. Members of the University community who are responsible for University communications about sexual violence will receive training.
- 6.8. Members of the Student Appeals Committee who review appeals for sexual violence investigations, will receive training to support them in their role to adjudicate appeals of this nature.

7. DISCLOSURES

- 7.1. Survivors may choose to disclose without making a report.
- 7.2. The University recognizes that survivors are most likely to disclose to another member of the University community. Survivors can disclose to anyone that they trust. However, survivors are encouraged to disclose to the appropriate University resources in order to access specialized care and support.
- 7.3. Student survivors seeking support may confidentially disclose to the Office of Student Affairs or Counselling Services.
- 7.4. Employee survivors seeking support may confidentially disclose to Human Resources, or to their supervisor. This could include the coordinator, chair, director, dean etc.
- 7.5. Appropriate support services and reasonable accommodations will be made available to all survivors who disclose. These supports are outlined in the associated procedures (B.401.1 – Sexual Violence Procedures).
- 7.6. Survivors do not need to prove that sexual violence occurred in order to access services and accommodations. If accommodations are requested for medical reasons, credible medical information may be required.
- 7.7. Survivors who choose to disclose or report will not be discriminated against if they have been engaged in other University processes such as student misconduct, academic misconduct etc.
- 7.8. Survivors will not be discriminated against if they have engaged in illegal activities or perceived illegal activities that do not pertain to the sexual violence incident disclosed, such as sex work. All Survivors who choose to disclose or report will be provided with support, resources and treated with dignity and respect.
- 7.9. Members of the University community who believe that they may have perpetrated sexual violence, can confidentially disclose to the appropriate resource and receive supports. Students can disclose to the Office of Student Affairs and employees can disclose to Human Resources or to their supervisor.

8. REPORTING

- 8.1. A report of sexual violence can be made under this policy. Complainants (survivors who choose to report) are encouraged to come forward when they feel able to do so. Survivors will not be coerced into reporting and will be provided with all options and information to support them with making the decision to report.
- 8.2. Human Resources is responsible for investigating and responding to reports where the

respondent is an employee or other member of the University community. The Office of Student Affairs is responsible for investigating and responding to reports where the respondent is a student.

- 8.3. External investigators may be appointed by the University in appropriate circumstances.
- 8.4. In cases involving behaviour that may fall within the definition of sexual harassment in the Discrimination, Bully and Harassment policy (B.511), a survivor will be given the choice to continue the processes and procedures set out in this policy and its associated procedures or to file a complaint under the Discrimination, Bullying and Harassment policy. If Human Resources determines the behaviour does not fall within the scope of the Discrimination, Bullying and Harassment policy, then the survivor may choose to proceed under this policy.
- 8.5. The procedures for investigating and responding to a report are set out in the associated procedures (B.401.1 – Sexual Violence Procedures).
- 8.6. Investigations and decision-making are guided by the principles of procedural fairness. Any and all evidence will be evaluated based on a balance of probabilities. Investigations will lead to a decision and consequences in the instances where a respondent is found to have violated this policy.
- 8.7. The taking of reports and the investigation process will be guided by a trauma and violence informed approach.
- 8.8. If a complainant discloses the use of alcohol and/or drugs as part of the incident(s), the investigator should not assume that this played a role in causing the incident(s). Furthermore, the use of alcohol and/or drugs by the respondent does not absolve them of what they are accused of.
- 8.9. Timeliness of investigation and response will vary based on factors including the availability of witnesses or evidence and/or involvement in other investigations and legal proceedings. As such, any timelines stated in this policy or its associated procedures are subject to change in appropriate circumstances.
- 8.10. Where a report is made of an incident of sexual violence by a member of the University community or against a member of the University community, which has occurred on or off University premise, that poses a risk to the safety of members of the University community, the University will take all reasonable steps to ensure the safety of the survivor and the broader University community in consultation with the Duty of Care Committee.
- 8.11. If a survivor chooses to report domestic violence there are different legal requirements and reporting procedures external to the University as outlined in the associated procedures.

8.12. The University encourages the responsible action of bystanders. When members of the University community witness sexual violence they are encouraged to access the appropriate campus resource for advice.

9. INTERIM MEASURES

9.1. The University may impose or facilitate interim measures as may be appropriate for the safety of the individuals involved and the University community. Interim measures are not intended to be punitive, but are intended to provide a safe(r) environment for all parties pending an investigation. Interim measures are outlined in the associated procedures (B.401.1 – Sexual Violence Procedure).

10. INVESTIGATION PROCESS

10.1. Respondents who are found to have committed an act(s) of sexual violence will be held accountable by the University and will be subject to appropriate sanctions.

10.2. If an investigator has a real or perceived conflict of interest, or there is a reasonable belief of bias, then another investigator will be appointed at the discretion of the University.

10.3. The procedures for investigating are set out in the associated procedures (B.401.1 – Sexual Violence Procedures).

11. SANCTIONS

11.1. Where the respondent is determined to be responsible for violating the policy, sanctions may include, but are not limited to, the following:

11.1.1. Letter of reprimand – A formal letter indicating the respondent’s breach of the policy and expected conduct moving forward. Normally, this is only used in the case of first-time incidents, or in addition to other sanctions.

11.1.2. Educational activity – The respondent will engage in reflection and growth through participation in tasks such as education, assignments, projects, and/or workshops.

11.1.3. Loss of privileges or use – A temporary or permanent ban on the respondent’s ability to access/use certain areas on campus including classrooms and buildings. This also extends to the use of University sponsored technology such as email accounts.

11.1.4. Removal from a course or program – Involuntary withdrawal from a course or program at the University. This differs from suspension in that the respondent may still be permitted to register for classes outside of the specified course or program.

11.1.5. Suspension – A temporary leave from the University for a specified period of time, normally including a ban from entering campus premises unless otherwise stated. Behaviour that occurs during a suspension and falls under the scope of the policy is still actionable by the University. Suspensions for members of the University community may only be imposed by the President.

11.1.6. Expulsion and termination – Permanent de-registration and removal from the University, normally including a ban from entering campus for a specified period of time. Expulsion for students may only be imposed by the President. Termination of employees may only be imposed by the President.

11.1.7. Other sanctions as required – The University reserves the right to impose sanctions other than those listed in this policy as appropriate.

11.2. Failure to complete or abide by imposed or agreed-upon sanctions is considered to be a further violation of the policy. Breach of sanctions may lead to the imposition of new or escalated sanctions up to and including suspension, expulsion or termination according to University policy and/or the applicable Collective Agreement.

12. ALTERNATIVE RESOLUTIONS

12.1. Survivors may request alternative methods of resolution, such as restorative justice or other transformative justice measures. The University will review requests and seek expert advice in determining if this alternative resolution is appropriate and in the interest of all impacted parties.

12.2. Restorative or transformative justice processes will only be conducted by University staff trained in these methods, or by an external expert.

13. APPEALS

13.1. Respondents and complainants have the right to appeal decisions made through the outcome of a sexual violence investigation.

13.2. Where the respondent is a student, appeals pursuant to the policy are made to the Student Appeals Committee as per the Student Appeals Policy (B.109). For the purposes of determining the submission deadline, the starting date will be the date that the decision is communicated in writing to the respondent.

13.3. Where the respondent is an employee, any disciplinary action taken as a result of sexual violence may be subject to grievance under the relevant Collective Agreement or, where

the employee is not covered by a collective agreement, appealed to the President. Appeals to the President must be filed within twenty-one (21) calendar days of the decision being communicated to the respondent in writing. Any decision by the President respecting an appeal under the policy and its associated procedures will be final, subject only to section 60 of the *University Act*.

14. RETALIATION

14.1. The University will not tolerate any retaliation, directly or indirectly, or threats of retaliation against anyone who discloses or reports or who participates in a process that responds to a report. Members of the University community who are found to have engaged in such conduct will be subject to sanctions up to and including expulsion or termination of employment.

15. GENERAL PROVISIONS

15.1. This Policy will be reviewed within three years of the date that the policy is issued in consultation with members of the University community including students. The associated procedures may be amended sooner if updates are required.

15.2. Once per academic year, an annual report will be conducted by the Office of Student Affairs in collaboration with Human Resources and the Capilano Students' Union (CSU). This annual report will be shared publicly and will include data on disclosures, reports, educational activities and other data as determined by the Sexual Violence Advisory Committee. Data shared will not include confidential information.

15.3. The University may be required to share data from the annual report with the Ministry of Advanced Education as per the *BC Sexual Violence and Misconduct Act*.

15.4. Once per academic year, the President will report to the Board of Governors on the implementation of this policy.

16. DESIGNATED OFFICER

16.1. The President is responsible for the administration of this policy and the development and subsequent revisions of any associated procedures.

17. REFERENCES

17.1. References can be found in Appendix A.

APPENDIX A

National Inquiry into Missing and Murdered Indigenous Women and Girls. (2019). *Reclaiming Power and Place: The final report of the National inquiry into missing and murdered Indigenous women and girls*. Retrieved from <https://www.mmiwg-ffada.ca/final-report/>

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