

Sexual Violence Prevention & Response Policy (ICM)

Effective: September 25, 2023

ICM staff, faculty, and students are part of a community that values safe and inclusive learning environments where we treat each other with respect. ICM educates the community on Sexual Violence prevention and responds to disclosures with compassion and care.

The Sexual Violence Prevention & Response Policy articulates ICM's commitment to support all members of the ICM community who are affected by Sexual Violence and provides information regarding the resources and options available to those affected by Sexual Violence. Adhering to [Bill 15 - The Sexual Violence Awareness And Prevention Act](#) and other relevant legislation, this Policy specifies measures and practices that ICM undertakes to create an environment for all students, staff, and faculty to learn, teach, work, and live in a safe manner and to be free of Sexual Violence of all forms.

The Policy outlines minimum requirements in which the College will:

- Raise awareness and understanding of consent and Sexual Violence;
- Provide training and resources for frontline staff to support students who choose to Disclose;
- Respond to Disclosures of Sexual Violence with compassion and care, adhering to privacy and confidentiality standards;
- Support people who have experienced Sexual Violence in understanding their available options for ongoing care and/or Reporting, allowing them to make informed decisions on how they wish to proceed; and
- Conduct fair process investigations, including recommendation and implementation of consequences for the person who has caused harm, in response to formal complaints.

The Sexual Violence Prevention & Response Policy and Procedure documents are available in alternate formats upon request.

SCOPE

This Policy applies to all ICM community members, including staff, faculty, and students. It is the responsibility of all members of the ICM community to treat each other respectfully in accordance with this Policy.

DEFINITIONS

The following are terms used in this Policy:

- a. **Anonymous:** No identifying information
- b. **Breach:** Conduct or behavior that is not allowed under the Respectful Work and Learning Environment Policy, the ICM Student Handbook, the Sexual Violence Prevention & Response Policy and Procedure, and other relevant policies and legislation.
- c. **Complainant:** The person who is Disclosing an incident of Sexual Violence or harassment.
- d. **Consent:** Defined as “giving permission for something to happen...[and] means a person voluntarily agrees, through words or actions, to engage in sexual activity” (Province of Manitoba). It is “an ongoing, voluntary agreement to engage in sexual activities by both parties” (Klinic Community Health). Consent:
 - Is never assumed or implied;
 - Is not silence or the absence of ‘no’;
 - Cannot be given if the victim is impaired by alcohol or drugs, or is unconscious;
 - Can never be obtained through threats or coercion;
 - Can be revoked at any time; and
 - Cannot be obtained if the person who has caused harm abuses a position of trust, power or authority (Province of Manitoba).
- e. **Disclosure:** Telling someone what has happened to receive emotional, medical, or advocacy support.
- f. **ICM Community Member:** Individuals who are:
 - i. students registered or enrolled in any component of a for-credit academic or training program or course at ICM;
 - ii. a registrant, defined as any person registered in non-credit educational activities at ICM;
 - iii. employees employed by ICM, including faculty and staff members;
 - iv. emeriti, volunteers engaged in an ICM activity, or other individuals acting on behalf of ICM;
 - v. any individual who provides or teaches any component of an academic program at ICM;
 - vi. any individual active on any ICM committee or review panel;
 - vii. post-doctoral fellows; and
 - viii. anyone contractually obligated to comply with this Policy.
- g. **Inappropriate Relationship:** A relationship where one person holds more power over the other and abuses their power to benefit themselves and as a result, negatively impacts the other person's life. There can be no consent given in this type of relationship. For example, an instructor to student,

teaching assistant to student, staff member to student, etc.

- h. **Reporting:** Making a Disclosure to someone in a trusted role. The person who has experienced Sexual Violence can choose to whom they report and what they wish next steps to be with that report.
- i. **Sexual Violence:** Defined as “a sexual act or act targeting a person’s sexuality, gender identity, or gender expression. The act can be physical or psychological that is committed, threatened or attempted against a person without their consent, and includes Sexual Violence, sexual harassment, stalking, indecent exposure, voyeurism and sexual exploitation” (Province of Manitoba). Sexual Violence is a crime. Sexual Violence occurs when one:
 - Does not agree (consent) to any form of sexual activity or contact;
 - Is forced through pressure, manipulation or threat to participate in any unwanted sexual activity or contact; and/or
 - Could not understand and agree to the sexual activity at the time (i.e., if one were asleep, unconscious, high or drunk, etc.).

POLICY CONTENT

ICM is committed to supporting community members in raising awareness of Sexual Violence through education and prevention efforts, by creating an environment of support and compassion when responding to disclosures of Sexual Violence, supporting the person who has experienced Sexual Violence in making informed decisions on how they wish to proceed with reporting, and conducting fair process investigations.

Prevention & Education

On a termly basis, ICM organizes preventative programming to raise awareness and understanding of consent and Sexual Violence. This includes:

- a) Providing information on consent, healthy relationships, safer sex, and sexuality through workshops.
- b) Promoting consent culture through engagement on social media, workshops, mandatory first-term student curriculum, and staff and faculty training.
- c) Working with community partners to provide students and community members with additional information and support.
- d) Providing information on power dynamics and inappropriate relationships as part of orientation sessions for any individual who will be taking on a position of power, including but not limited to new staff (including faculty and TAs) and student leader managers.

ICM strives to ensure this Sexual Violence Prevention & Response Policy document serves as an educational tool for its community, ensuring it remains current and easy to understand. This includes:

- a) Updating and monitoring the Sexual Violence Prevention & Response Policy and Procedure documents every three years to ensure that it remains inclusive, accessible, and representative of the international student experience.
- b) Actively creating opportunities for student voices to be heard in the ongoing application of the Sexual Violence Prevention & Response Policy and Procedure.
- c) Ensuring all members of the ICM community are aware of and understand the Sexual Violence Prevention & Response Policy and Procedure.

Support & Care

ICM responds to disclosures of Sexual Violence with compassion and care. This supportive environment is created by:

- a) Ensuring all community members understand their role in making sure ICM is a safe environment for everyone, actualized through onboarding discussions and regular training/programming.
- b) Complying with and explaining privacy and confidentiality legislation.
- c) Actively requesting and practicing informed consent.
- d) Supporting the person who has experienced Sexual Violence in a non-judgmental way to make sure they feel respected and heard.
- e) Speaking up (advocating) for those impacted by Sexual Violence when such support is requested by the person who has experienced Sexual Violence.
- f) Providing ICM student services staff with biennial training on responding to disclosures and vicarious trauma.
- g) Providing resources for people who have experienced Sexual Violence to explore their options and make informed decisions.
- h) Providing support for people who have experienced Sexual Violence regardless of when, where in the world, whether it was in person or online harassment, or by who the Sexual Violence occurred.

Reporting

ICM reviews reporting options with the person who has experienced Sexual Violence by:

- a) Ensuring that when possible, people who have experienced Sexual Violence can choose when, to whom, and how much they wish to disclose.
- b) Respecting that people who have experienced Sexual Violence are not expected to formally report if they do not wish to do so.

Note: In Manitoba, it is the legal obligation of all to report suspected child abuse of

minors, 17 and younger, to Child and Family Services (CFS). Therefore, ICM is mandated to report to CFS in such circumstances.

Investigations

When Sexual Violence allegations involving an ICM Community Member are formally reported to ICM, the College will initiate an investigation into the allegation in accordance with procedural justice. This includes:

- a) Providing a fair process to ensure all involved parties have been listened to and are aware of the Sexual Violence Prevention & Response Policy and Procedure and options available;
- b) Where permission of the person who experienced Sexual Violence is given or where required, involving third-party investigations;
- c) When investigations determine that an ICM Community Member has committed Sexual Violence in relation to an ICM or UM matter, enforcing disciplinary action.

Non-Compliance

If an ICM Community Member fails to follow the requirements of the Sexual Violence Prevention & Response Policy and or Procedure, ICM Student Handbook, Navitas Staff-Student Relationships Policy, UM Respectful Work and Learning Environment, or other relevant policies, they may be subject to disciplinary action, up to and including termination of employment or academic program.

REVIEW

Policy review shall be conducted every three (3) years. The next scheduled review date for this Policy is **September 25, 2026**. This review shall be undertaken by a Sexual Violence Working Group which consists of ICM staff, faculty, and students, in consultation with community partners.

Sexual Violence Prevention & Response Procedure (ICM)

Effective: September 25, 2023

ICM staff, faculty, and students are part of a community that values safe and inclusive learning environments where we treat each other with respect. ICM educates the community on Sexual Violence prevention and responds to disclosures with compassion and care. ICM is committed to ensuring that students who wish to disclose any incidences of Sexual Violence are aware of the options they have for support and reporting. It is up to the student's discretion as to what steps they decide to take when making the decision to disclose.

The Sexual Violence Prevention & Response Policy and Procedure documents are available in alternate formats upon request.

SCOPE

This procedure applies to all ICM Community Members. It is the responsibility of all ICM Community Members to treat each other respectfully in accordance with this procedure.

Procedure CONTENT

Prevention & Education

Workshops

ICM's Student Wellness Manager (or designate) will facilitate the development and delivery of workshops focused on consent, healthy relationships, safer sex, and sexuality through workshops delivered on a termly basis. Community partners external to ICM may be engaged in this process as well.

Social Media

ICM's Student Wellness Manager and Student Experience Manager (or designates) will develop content for social media engagement, including advertising upcoming workshops and events, raising awareness on the Sexual Violence Prevention & Response Policy and Procedure, along with various topics covered within it, such as consent and disclosures.

Community Partners

ICM's Community Engagement Program working group seeks to engage various external community members to enhance the student experience. This group will actively seek community partners who have a focus on aspects related to the Sexual Violence Prevention & Response Policy and Procedure, including but not

limited to sexuality, healthy relationships, reproductive rights, and consent.

Onboarding Sessions

All ICM staff responsible for delivering onboarding sessions to new ICM Community Members are expected to include components of power dynamics in orientation sessions highlighting how inappropriate relationships will not be tolerated.

Policy Development

ICM's Associate Director (Students) will oversee the triennial review of the Sexual Violence Prevention & Response Policy and Procedure to ensure it remains inclusive, accessible, and representative of the international student experience. This oversight will include consultation with students and other ICM Community Members.

Updated policy and procedure language will be recommended by a Sexual Violence Working Group and approved by the ICM senior leadership team, which (at time of publication) includes the College Director, Associate Director (Students), Associate Director (Academic), and Marketing Director.

Support & Care

Training

It is ICM's priority to ensure that staff recognize and respond effectively to students who are experiencing mental health hardships, as well as those making disclosures of Sexual Violence. To best support staff with formalized training, ICM endeavours to provide the following training opportunities, ideally on the schedule noted below and subject to availability, and as deemed appropriate by the College's senior leadership:

- a) All Student Success staff will complete training on responding to Sexual Violence disclosures, within six (6) months of commencing employment and subsequently renewed every two (2) years.
- b) All Student Services staff will complete Mental Health First Aid training within the first six (6) months of employment with ICM to ensure they have the tools to support and advocate for students.
- c) All ICM Instructors will be invited to Mental Health First Aid training, offered at least once a year, at no cost to themselves.
- d) All Student Success staff will complete Applied Suicide Intervention Skills Training, ("ASIST"), to respond to students experiencing suicidal ideation, within six (6) months of commencing employment.
- e) All Student Services staff will complete crisis intervention training to ensure they are equipped to respond to a student in crisis, within twelve (12) months of commencing employment.

- f) All Student Success staff will be trained in trauma-informed care, within twelve (12) months of commencing employment, and subsequently renewed every two (2) years.
- g) All staff are aware of the legal obligations, and understand the scope, of informed consent, confidentiality, and privacy.
- h) All staff are invited to other training programs, both in-person and online, in the areas of trauma, mental health, counselling skills, and violence prevention, along with team debriefs to better understand how these learned concepts can be implemented within an ICM context to better enhance the student experience.
- i) All staff are invited to join annual professional development sessions focused on community resources, both within Winnipeg and abroad, to appropriately support students seeking referral services.

Students may look up to their peer mentors for support and guidance. As such, to best support student leaders with formalized training, ICM endeavours to provide the following training opportunities, ideally on the schedule noted below and subject to availability, and as deemed appropriate by the College’s senior leadership:

- a) All student leaders are invited to an annual training focused on how to safely intervene as a bystander in instances where Sexual Violence, relationship violence, or stalking may be impacting a fellow student, thereby supporting peers going through challenging experiences that may negatively impact their mental and physical health.
- b) All student leader managers will be offered the opportunity to become Mental Health First Aiders at no cost to themselves. Student leader managers will feel equipped to support and refer students who are experiencing difficulties.

Disclosures

The decision to Disclose and the decision to Report are separate decisions. An individual may choose to Disclose Sexual Violence without making a Report. Disclosure does not result in a Report being made, and does not initiate an investigation or other action by ICM. If an individual wishes to make a Disclosure of Sexual Violence they can do so by telling a trusted member of the ICM community what has happened. This can be a Student Success Advisor, Student Wellness Manager, an Instructor, a Peer Advisor, or a close friend.

Immediate Response to Disclosures

When an individual Discloses an incidence of Sexual Violence to an ICM staff member, the ICM staff member will ensure that the individual is in a safe and private space. The ICM staff member will ask the individual who has experienced Sexual Violence if they are comfortable sharing their story with an ICM staff

member who is trained in responding to Disclosures. If the individual agrees, they will be referred to the ICM Student Wellness Manager or a trained staff member who will best able to support the individual with their desired next steps. Please note that in the instance of a Disclosure:

- a) ICM will not share a Disclosure of Sexual Violence to Immigration, Refugees, and Citizenship Canada (IRCC).
- b) ICM will refrain from judgement or blame on any external factor such as substance use, dress, conduct, emotional disposition, past sexual history, or timing of Disclosure.
- c) ICM will provide support to the individual who has experienced Sexual Violence regardless of when or where in the world the Sexual Violence has taken place.
- d) ICM will assist the student in obtaining reasonable academic accommodations, if desired, by the impacted individual.
- e) ICM will work with the person who has experienced Sexual Violence on safety planning, if required.
- f) If the disclosure relates to an ICM employee, UPNA/Navitas Human Resources will be advised immediately in accordance with the confidentiality measures outlined below.
- g) ICM will provide a referral to medical intervention, if needed. Such referral services include (at time of publication) [Klinik Sexual Assault Crisis Program](#), Sexual Assault Nurse Examiner ([SANE](#)), or Health Sciences Centre Emergency.

Confidentiality, Informed Consent, and Privacy

Disclosures of Sexual Violence are a very sensitive and personal topic, which often requires a great deal of courage and vulnerability on the part of the person Disclosing the circumstances. ICM supports students within the confines of confidentiality, informed consent, and privacy limitations, as specified below.

Confidentiality

Information about a person who wishes to Disclose will not be released to any third party (e.g. Instructors, Associate Director (Academic), College Director, family member, other health practitioners, etc.) without the individual's informed, voluntary, and written or verbal consent, with the exception of the certain situations where such information is required to be shared with a third party, as set out below.

There are important exceptions to where confidentiality must be broken in order to protect those involved, which include the following circumstances:

- a) ICM has a legal obligation to report all suspected child abuse of minors (17 years of age and younger), to Child and Family Services (CFS);
- b) If the individual is at risk to hurt themselves or another person;
- c) If required for legal purposes, for example there is a subpoena by a court of law requiring disclosure;
- d) If there is concern for the safety of others on campus, the support person will consult with the Sexual Violence Resource Centre and/or others to assess if a Report must be made;
- e) If there is an inappropriate relationship where one person holds more power over the other and has abused this power to benefit themselves; both within or outside of the ICM community.

Informed Consent

Informed consent includes verbal and written information regarding the obligations, responsibilities, and rights of the person Disclosing and the support staff. This includes the potential risks and benefits of Disclosing the incident and pursuing further reporting/investigation. Disclosing Sexual Violence has the potential to be an empowering experience and may also prevent the individual who has caused harm from doing it again. However, there could be risks associated with Disclosures and Reporting, which must be presented to the person completing a Disclosure. As such, the benefits and risks, along with alternate options, will be presented to the individual Disclosing instances of Sexual Violence, to ensure any consent they provide is informed consent.

Privacy

- Students will have their personal information kept confidential in secure software, except where disclosure of such information is required as set out above.
- Students are able to access their own personal records and can make a request for copies from the ICM Student Wellness Manager or Student Success Advisor.

Reporting

Anyone directly subjected to Sexual Violence, including an individual who is not an ICM Community Member, can make a Report against an ICM Community Member regarding Sexual Violence under this procedure.

Any ICM Community Member who has experienced Sexual Violence has the autonomy to decide if they wish to Report their experience in order to seek an informal or formal resolution. ICM staff will provide individuals disclosing experiences with Sexual Violence with information on their various Reporting options and, if the individual chooses to further explore any of these available

options, the staff member will support them with their reporting needs.

Reporting to ICM

Upon Reporting an incidence of Sexual Violence to an ICM staff member, the ICM Community Member will be provided trauma informed and client centered support. They may be connected with the ICM Student Wellness Manager who will provide them with resources and assist them with their decision making and Reporting process if they choose to do so.

ICM Community Members who have experienced Sexual Violence may also be offered to connect with on campus resources such as the [Sexual Violence Resource Centre](#), or the [University of Manitoba Counselling Centre](#) to provide support and guidance.

Formal and Informal Reporting Options for Individuals in Manitoba

Formal Reports

ICM Community Members who choose to Report experiences of Sexual Violence must submit written Reports to the ICM Associate Director (Students) and/or the College Director. The Report should set out the relevant details regarding the alleged Sexual Violence. Reports should include a list of any potential witnesses, along with a description of the information those witnesses are expected to provide. Copies of relevant documents, including any social media communications, should be provided with the Report.

ICM Community Members who make a Report will be offered ongoing support and care from Case Management. Case Management will assist the ICM Community Member in gaining any resources they may require to move towards healing and recovery. Resources can include, but are not limited to the following:

- Ongoing regular meetings with Case Management;
- Connecting to a counsellor or therapist in Winnipeg;
- Connecting to the Sexual Violence Resource Centre on Campus; and/or
- Connecting to a sexual assault survivor program through organizations such as [Survivors Hope Sarah Program \(Sexual Assault Recovery and Healing\)](#), or [Klinic Community Health Sexual Assault Crisis Program](#).

Reporting to Police

ICM Community Members who have experienced Sexual Violence may choose to Report Sexual Violence through the criminal justice system, for example through police services. In most cases, it is the choice of the individual who has experience Sexual Violence to Report. However, there are circumstances where an incident of Sexual Violence must be Reported, which include where:

- The individual who has experienced Sexual Violence is under the age of 18, in which case the Sexual Violence must be reported to child welfare authorities such as Child and Family Services.

- The police become aware of Sexual Violence by a spouse or intimate partner in the past or present, they have a duty to investigate.

The police can help begin an investigation into the Sexual Violence incident. They can help with gathering evidence, answering questions about the police investigation and processes, linking the person who has experienced Sexual Violence to other resources, and taking a formal statement from the person who has experienced Sexual Violence. This may be an option for individuals who wish to pursue criminal charges or restraining orders.

Reporting to Third Parties

An ICM Community Member may choose to make a Report of Sexual Violence to a third party, such as the Klinic Sexual Assault Crisis Program or another community-based agency. Making a Report to a third party may not result in a police investigation, however in some circumstances the anonymized information collected during a Report to a third party may be provided to the police directly from the third-party.

As noted by Klinic, benefits of such Reporting may include:

- Providing information about a crime to the police while maintaining anonymity;
- Maintaining official documentation about the Sexual Violence;
- Providing information indicating patterns or themes from repeated offenders;
- It can help a person who has experienced Sexual Violence to feel that they are taking some sort of action even though they are staying at arm's length from the police system; and/or
- Individuals maintain their right to formally involve the police in the future.

Please note that anonymity cannot be guaranteed in all circumstances, for example where the offender is an intimate partner, or when there is a duty to report on child abuse matters. If ICM Community Members have any questions about these limitations to confidentiality and anonymity, please contact the ICM Student Wellness Manager or a Student Success Advisor for clarification.

In Manitoba there are multiple agencies that can accept third party reports on behalf of the Winnipeg Police or the RCMP. If the incident took place in Winnipeg, you can reach out to any of the following agencies:

- Klinic Community Health: 204-784-4049
- Mount Carmel Clinic - Sage House: 204-943-6379
- Pluri-elles (in French): 204-233-1735

If the incident took place outside of Winnipeg but within Manitoba, you can reach out to any of the agencies listed below:

- Klinic Community Health: 1-888-292-7565

- Survivor's Hope Crisis Centre (North-Eastern Manitoba): 1-204-753-5353

Reporting Options for Individuals Outside Manitoba

Individuals who have experienced Sexual Violence who are not located in Canada can call contact the following resources for support:

- Child Helplines- International counselling support and agencies:
<https://www.childhelplineinternational.org/child-helplines/child-helpline-network/>
- Kids Help Phone- 1-800-668-6868 or <https://kidshelpphone.ca/>

Investigations

ICM will treat claims of Sexual Violence seriously, and all claims will be investigated to protect complainants and witnesses from further victimization, subject to ICM's jurisdiction set out below.

ICM's jurisdiction to investigate is determined by the College Director and is limited to the following:

- the allegations of Sexual Violence must be against an individual who was an ICM Community Member at the time of the alleged Sexual Violence and at the time the Report is being submitted;
- the alleged conduct must fall within the definition of Sexual Violence; and
- the alleged conduct must have occurred in a context that has a real and substantial connection to ICM. Whether a real and substantial connection to ICM exists will be determined on the particular circumstances of each report.

ICM may exercise discretion to decline to investigate a Report of Sexual Violence under this Policy on the grounds that:

- proceeding with the complaint would be unfair and result in substantial prejudice to any person such as when the passage of time affects access to witnesses or other evidence; or
- proceeding with the complaint is otherwise not practical.

An investigation involves a formal review of the incident(s) that has been Reported. An investigation may be initiated for a variety of reasons, including at the request of the ICM Community Member who experienced the Sexual Violence or if there is risk to the safety and security of the community. The investigation will be conducted by an individual who is not connected in any way to the individuals involved in the incident to minimize any potential conflicts of interest.

The investigation includes the following:

- Discussing the incident with all involved parties;
- Reviewing any documentation that may be presented;

- Reviewing any tests, photos, or videos that are brought forward; and/or
- Assisting the individual who has experienced Sexual Violence to arrange for any testing or other medical support if they wish to do so. If an individual wishes to have testing administered, they will be connected with Survivors Hope (SARAH) or Klinik Community Health Sexual Assault Crisis Program.

In the event of an investigation, the person who has experienced Sexual Violence and all other ICM Community Members involved in the incident must fully cooperate with the investigator. In order for an investigation to run smoothly, it is important that requests are responded to within the timeframe set forth by the investor. ICM may implement interim measures to limit or prevent interaction between the person disclosing and the person alleged to have engaged in Sexual Violence during the investigation.

In the event that the individuals involved in the investigation stop cooperating with the investigator due to no longer being connected to the ICM/UM community, or for any other the reason, the investigator will make their determination based on the information they were able to obtain to determine whether or not a breach to the Sexual Violence Prevention & Response Policy has taken place.

It is the responsibility of the investigator to:

- Provide the person who has experienced Sexual Violence with the opportunity to share their story and provide any evidence they wish to provide;
- Provide a written letter specifying the complaint, if the person who is alleged to have engaged in Sexual Violence is an ICM Community Member;
- Work with the person who has experienced Sexual Violence to determine how best to reach the others involved in the Report, if the person who is alleged to have engaged in Sexual Violence is not a member of the ICM community, and if necessary conduct a joint investigation with another organization, making those arrangements while keeping within the confines of confidentiality where possible;
- Obtain evidence and information regarding the alleged Sexual Violence from the person alleged to have engaged in the Sexual Violence, recording this information in writing; and
- In the event that there are witnesses, the investigator will obtain their accounts of events, recorded in writing.

If at any point in time during the investigation the party who experienced the Sexual Violence wishes to stop the investigation due to an informal resolution taking place, the investigation will be stopped, except in the case that there is a risk of harm to a minor, a vulnerable person, or another person.

If during the investigation it becomes apparent that another breach to any other policy at ICM has taken place, the breach will be acted on in accordance with that

policy that has been breached.

Investigation Report

Similar to the UM's investigation report, the investigator will review all evidence and information submitted in the Report and will draft an Investigation Report, which will include:

- A summary of the initial allegation;
- A summary of the process undertaken as part of the investigation;
- A summary of all accounts reported, including those from the person who has experienced Sexual Violence, the person alleged to have caused harm, any witness accounts, and any other relevant evidence submitted as part of the investigation;
- A summary of which evidence was considered credible and reliable; and
- A conclusion if, on a balance of probabilities, a breach to the Sexual Violence Prevention & Response Policy has been committed.

The investigation will be completed within ninety (90) business days from the date the Report was submitted. In some circumstances, an investigation may require an extension of this timeline, in which case all parties will be notified.

Result of Investigation

The written results of any investigation into alleged Sexual Violence will be provided to the ICM Community Member who experienced the Sexual Violence and the ICM Community Member alleged to have conducted the Sexual Violence.

If it is determined at the conclusion of an investigation that an ICM Community Member has breached the Sexual Violence Prevention & Response Policy or Procedure, or breached the Student Code of Conduct of the ICM Student Handbook, that individual will be subject to disciplinary action, which may include the following:

- In the case where an individual is an ICM employee, consequences will be in accordance with applicable employment legislation, as well as the Navitas Human Resources Policies.
- In the case where an individual is an ICM student, they may be subject non-academic probation that can result in termination from the ICM program, or immediate suspension or termination depending on the nature of the offence and the safety of other community members. Additional measures may also be taken, such as removal from a certain course or residence in order to restrain the individual from being in contact with the person who has experienced the Sexual Violence.
- In the case where the ICM Community Member is neither a student nor an employee, appropriate action may be taken, depending on the wishes of the person who has experienced Sexual Violence.

If it is determined that no breach of the Sexual Violence Prevention Policy or Procedure has taken place, student records and case notes will be updated accordingly and the person who made the original disclosure will be provided with ongoing support and connection to resources if they wish.

If the individual alleged to have engaged in Sexual Violence is an ICM employee, a copy of the report will also be provided to UPNA/Navitas Human Resources.

Threats of Plans for Retaliation

ICM has zero tolerance for reprisal or threats of retaliation against any ICM Community Member or member of the UM community in respect of the Sexual Violence Prevention Policy and Procedure. In cases where there is evidence of reprisal or threats of retaliation, ICM will move forward with appropriate actions depending on the individual alleged to have conducted such retaliation. If the person making threats or plans for retaliation is an ICM Community Member, appropriate disciplinary actions up to and including termination from the ICM program, or immediate suspension may be applied. In cases where the person making threats or plans for retaliation is not an ICM Community Member, appropriate next steps such as a report to police or organization may result, at the discretion of the person who has experienced Sexual Violence.

In accordance with ICM's policies on Student Conduct (Section 1.3 of the ICM Student Handbook) and Discrimination and Harassment (Section 1.4 of the ICM Student Handbook), ICM strives to provide a safe and conducive learning environment. It is expected that ICM Community Members will conduct themselves in ways that align with the standards of conduct and acceptable behavioral guidelines. By ensuring everyone is following the guidelines set forth we can all enjoy a working and learning environment where community members feel safe and respected. ICM will continue to prioritize the safety and mental and physical health of all ICM Community Members by ensuring that everyone is aware of the policies and procedures created to support this environment.

REVIEW

ICM's Sexual Violence Working Group will, on an annual basis, review its activities from the previous year, including initiatives to raise awareness and understanding of consent and Sexual Violence, to provide training and resources to frontline staff to support students who choose to Disclose, and to respond with care and compassion to those who Disclose and or Report Sexual Violence. This annual summary will be publicly accessible.

This Policy will be reviewed every three (3) years. The next scheduled review date for this Policy is **September 25, 2026**. This review shall be undertaken by a Sexual Violence Working Group which consists of ICM staff, faculty, and students,



in consultation with community partners.

References

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