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The Atlantic Council for International Cooperation pledges to adopt a zero-tolerance approach to sexual violence, and to adopt a survivor-centred and trauma-informed approach to reports of sexual violence.

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Policy on Preventing and Addressing Sexual Violence

On the most fundamental level, the Atlantic Council for International Cooperation (hereinafter “ACIC”) believes that every human being has the right to live a life free from the threat or action of sexual violence, and that if they are exposed to sexual violence, that they deserve a channel through which to seek justice and healing. ACIC is choosing to use “sexual violence” as an all-encompassing term in order to acknowledge and recognize multiple forms of violence, including sexual harassment, exploitation, assault, rape, and acts of aggression. (See detailed definition in Appendix A.) Sexual violence can occur to any person, regardless of their position within society, age, race/ethnicity, gender identity, sexuality, ability, nationality, or faith. However, ACIC acknowledges that women are disproportionately targeted for sexual violence, therefore making sexual violence a gendered crime. ACIC understands that sexual violence also disproportionately affects people of colour and Indigenous peoples, people living with disabilities, new Canadians, and people who identify as 2SLGBTQ+.

Through this policy, ACIC pledges to adopt a zero-tolerance approach to sexual violence, and to adopt survivor-centred and trauma-informed approaches to reports of sexual violence. Within our organization, we will create a culture that reduces the likelihood of sexual violence occurring. However, we realize that a zero-tolerance approach to sexual violence does not mean that zero incidents of sexual violence will occur. As such, we are accepting of survivors’ experiences, and are open to receive, process, and have reports of sexual violence investigated.

The ACIC Policy on Preventing and Addressing Sexual Violence represents this organization’s commitment to fully implement practices that will protect our staff, interns, volunteers, and the communities we serve from any and all forms of sexual violence. We define sexual violence as a sexual act attempted or committed against someone without that person’s consent. Later in this document, this definition is further expanded.

Towards this end, ACIC commits to provide information to ACIC staff, directors, volunteers, interns, program participants and member/partner organizations (ACIC Stakeholders), and any other persons representing ACIC about sexual violence, how to prevent it, how to address it if it does happen, as well as the protection of minors. We pledge to provide appropriate education and training on an annual basis to staff, directors, volunteers, and interns. This includes general training on PSEA during board and staff orientation processes, and more program specific training for interns, staff and volunteers that are working directly with youth. Other training will be provided, as appropriate, including refresher training on an annual basis.

Purpose

PREVENTING SEXUAL VIOLENCE

There are two purposes of this policy. The first is to prevent sexual violence from happening within ACIC and working towards preventing it from happening in all spaces that ACIC occupies both domestically and internationally. ACIC will work towards this goal in the following ways:

1. Providing appropriate education and training to members of the Board of Directors (hereinafter “Board members”), employees, volunteers, interns, and all other representatives;

2. Providing information to ACIC's partner organizations, member organizations, and engaged stakeholders about sexual violence;
3. Creating and maintaining an organizational culture with regular messaging about healthy and hazardous practices in the workplace and in society.

SUPPORTING SURVIVORS

The second goal of the policy is to provide support for those who have experienced sexual violence through their association with ACIC and are seeking justice. We take seriously all disclosures of sexual violence and will investigate and respond to reports as they arise. Support will be provided in the following manners, by:

1. Providing victims/survivors with a variety of choices in how to submit reports, such as verbally, written, anonymously - according to their needs;
2. Providing information or access to community supports and referrals, and in some cases, accommodations and supports, such as therapeutic, legal, information etc, within the capacity of the organization.

Scope

THIS POLICY APPLIES TO EVERYONE THAT WORKS FOR AND/OR REPRESENTS ACIC

This policy applies both to ACIC as an employer and as a member- and community-serving organization. As such, the policy applies to all members of the Board of Directors and all ACIC employees, consultants, volunteers, interns, program participants and representatives. The policy will be proactively applied to the programming work of the organization where ACIC has control and influence, including program, management, and governance areas.

THIS POLICY AFFECTS ACIC PARTNERS, MEMBERS, AND STAKEHOLDERS

This policy also applies to ACIC's partners, members, and stakeholders in the sense that

1. ACIC will work to engage them around the topic of preventing and addressing sexual violence;
2. ACIC will prioritize working with partners, members, and stakeholders who demonstrate a commitment to strong practices of PSEA.
3. ACIC will recognize and work with members with reports of sexual violence brought against its staff, directors, interns, volunteers, and/or any other persons representing ACIC, working within the organizations capacity and ability to respond with compassion.

Implementation

ACCOMMODATIONS

CREATING A ZERO-TOLERANCE CULTURE

The ACIC pledges to adopt a zero-tolerance approach to sexual violence by creating a culture that reduces the likelihood of sexual violence occurring, and that responds quickly, decisively, and competently to incidents of sexual violence. "Zero-tolerance" does not simply mean zero tolerance for the perpetration of sexual violence and rape culture, but also a zero tolerance for any inaction when the perpetration of sexual violence is known.

ADDRESSING RAPE CULTURE

ACIC will make every effort possible within reason to address rape culture in the workplace by ensuring that rape myths and other harmful attitudes are not spread in any spaces that the organization occupies.

ACIC will provide education and training on the effects of rape culture on society to ACIC stakeholders, and in the instance that any employee, intern, volunteer, or any other person representing ACIC is found to be spreading the harmful attitudes and behaviours seen in rape culture, ACIC will conduct follow up. ACIC will also work with members that are seen to be spreading the harmful attitudes and behaviours seen in rape culture.

PROTECTION OF MINORS²

The ACIC works closely with minors both domestically and internationally. It is of utmost importance that ACIC employees, interns, members, volunteers, and any other persons representing the organization recognize the problem of violence against minors, its impact on minors, how to prevent violence, and what to do in order to protect minors when violence is suspected or known. The ACIC is committed to working to create environments that are free from sexual abuse and exploitation. This abuse can involve physical, emotional, and/or sexual mistreatment, or a lack of care that could cause physical or emotional damage to a minor. The ACIC considers all forms of minor abuse to be completely unacceptable. ACIC will follow any legal obligations, reporting disclosures of sexual violence against a minor which occur at events or interactions with youth participants.

SEXUAL VIOLENCE WHEN WORKING ABROAD

ACIC has a number of programs and activities where participants, interns, staff and board are travelling or working abroad. Acts of sexual violence are crimes in Canada and are covered under the Criminal Code of Canada. It is important to note that the laws surrounding sexual violence may differ from country to country where ACIC has international programs. ACIC's response to staff, volunteers, interns, or any other persons that represent ACIC who experience sexual violence will remain the same, regardless of where the incident occurs. ACIC will also provide training that covers PSEA as part of any pre-departure training for international activities, and where possible, will inform those travelling of their rights and responsibilities around sexual violence.

Prevention and Education

ACIC wishes to encourage all persons representing the organization to work together in order to promote a safe learning, living, and working environment for everyone.

In the effort to do our part to prevent and address sexual violence, ACIC will provide all staff, Board members, interns, volunteers, and any other persons representing ACIC with appropriate and relevant information on preventing and addressing sexual violence. The ACIC will ensure that all staff, Board members, interns, volunteers and any other persons representing ACIC have a proactive and an ongoing understanding of the prevention of sexual violence, the relevant policies, and the roles and responsibilities in the case of disclosure or allegation made by another staff member, intern, volunteer, or any other persons representing ACIC.

The ACIC considers the recovery of the victim/survivor to be of utmost importance. Therefore, the organization will do its best to provide all staff, Board members, interns, volunteers, or any other persons representing ACIC with available community resources in the instance of experienced and reported sexual violence. Additionally, clear procedures on how to acquire support will be made known to all management staff, Board members, or other persons representing ACIC that are directly dealing with program participants, interns or others.

INDIGENOUS PEOPLES AND SEXUAL VIOLENCE

It is incredibly important for all ACIC staff, Board members, interns, volunteers, and any other persons representing the organization to understand that sexual violence has always and continues to have significant and unique impacts on Indigenous peoples, dating back to colonization. The education and training for all staff, Board members, interns, volunteers, and other persons representing ACIC will remain a significant priority for the organization.

In an effort to address sexual violence, to protect minors, and to reduce the prevalence of sexual violence that targets Indigenous peoples, ACIC will provide all interns travelling abroad with country-specific information regarding sexual violence in the countries they are travelling wherever possible, with the understanding that some countries may not have any information available on sexual violence.

RECRUITMENT

Through the ACIC's recruitment of staff, board directors, interns, and volunteers, the organization will create conditions that make it clear from the beginning of a staff's contract, a board director's term, or a volunteer or intern's contract, that sexual violence will not be tolerated and will be subject to disciplinary and potentially legal action, and that all survivors of sexual violence will be supported by the organization as directed through this policy.

Any ACIC staff, board directors, and volunteers that work with a vulnerable sector will be required to provide a copy of a vulnerable sector check before working with a vulnerable population or before the end of their probationary period. Interns will be required to provide a vulnerable sector check before beginning their placement.

- Members of the vulnerable sector include individuals who, because of age, disability, or other circumstances, are more vulnerable than others;
- ACIC recognizes that vulnerable sector checks can fail to reflect the ways in which policing affects marginalized communities, and if something appears on an applicant's application, the hiring committee will provide candidates who are accepted for interviews with the option to explain any notes on their criminal background check. However, ACIC reserves the right to consider an applicant's criminal background check in determining whether to confirm their employment status.
- Results of vulnerable sector checks are only made available to organizations located within Canada. This makes ACIC responsible in ensuring that any ACIC staff or interns who travel abroad obtain vulnerable sector checks. While this information cannot be shared with international partners, the background checks should be used to inform internal decisions regarding recruitment and hiring.

ONBOARDING

Through the ACIC's onboarding of staff, board directors, interns, and volunteers, the organization will set in place the framework for who will be responsible for overseeing the training and education of new and returning ACIC staff, board directors, interns, and volunteers, and what these programs will look like.

As part of the orientation process, all new staff, board members, interns and volunteers will be required to review this policy and their direct supervisor (or the ED) will walk them through it. A refresher courses will also take place when returning staff members sign new contracts, or change roles within the organization.

Reporting, Investigating, and Disciplinary Measures

SUBMITTING A REPORT

ACIC cannot and will not force any persons to disclose or report their experiences of sexual violence. However, ACIC strongly encourages any person who has experienced sexual abuse, sexual exploitation, or any other form of sexual violence by any other employee, intern, or volunteer of ACIC, or while working or volunteering for the organization, to submit a report.

There is no time limitation on how long after an experience of sexual violence that someone can disclose or report to ACIC. However, disciplinary actions may change depending on the amount of time passed since the reported incident of sexual violence due to availability of disciplinary options. If the alleged perpetrator is no longer an employee/volunteer of ACIC, but the incident occurred during their tenure in a position with the organization, we will support the victim/survivor by providing referrals to appropriate supports, acknowledging that ACIC would be unlikely to be able to impose disciplinary action in such a case.

REPORTING INCIDENTS TO AUTHORITIES

It is ultimately the choice of the victim/survivor whether to report their experience to the police, both domestically and internationally.

The ACIC has a legal duty to report any incidences of sexual violence to authorities in instances of sexual violence that involve minors, whether the situation involves an employee, intern, or volunteer who is abusing or exploiting minors, or a minor who experiences sexual abuse or exploitation and is affiliated with ACIC. Therefore, a report will be made by ACIC to authorities in cases where situations involve a criminal offense in the workplace or there is a requirement by law to report incidents of suspected or actual abuse.

INVESTIGATION AND DISCIPLINARY MEASURES

It is not in the power of ACIC to investigate reports or allegations to the extent of finding criminal guilt or innocence. When a report or allegation of sexual violence is submitted to ACIC, the only way ACIC will investigate is to determine what accommodations and/or disciplinary measures need to be taken in order to ensure the safety of the victim/survivor.

When reports are credible, disciplinary measures will be taken.

Respondents' relationships with ACIC can be suspended while reports are investigated.

The norm would be that respondents' relationships with ACIC would be suspended while reports of their alleged misconduct were being investigated. However, ACIC realizes that doing so may not always be in the best interest of the victim/survivor; perhaps they instead would feel safer taking time away from their relationship with ACIC.

Therefore, ACIC is open to consulting with the victim/survivor to determine what works best for their safety.

If the defendant works for ACIC in a paid capacity, they will be suspended with pay while the report against them is investigated.

Violation of this policy is a breach of the employment relationship and funding relationship. It is subject to progressive disciplinary action possibly leading to termination of employment or, in some cases, direct and immediate termination of employment.

Action taken may include:

- Employees - disciplinary action (including verbal, written warnings, suspension with/without pay) or dismissal;
- Volunteers, board members, interns – disciplinary action (including verbal, written warnings, suspension with/without pay) or termination to their relationship with ACIC;
- Partner and member organizations - termination to their relationship with ACIC;
- Consultants, contractors - termination of contract.

RETALIATION

ACIC will not tolerate any form of retaliation that occurs in response to any reports or allegations of sexual violence. Any individual who is found retaliating against a victim/survivor will face serious disciplinary actions that can include dismissal or termination of their relationship with ACIC.

BAD FAITH ALLEGATIONS

While the occurrence of bad faith allegations is uncommon, ACIC recognizes that allegations made in bad faith still occur. In reality, bad faith allegations of sexual violence are reported at about the same rate as bad faith allegations of other serious crimes are reported.

If any persons representing ACIC brings forward a concern or allegation made maliciously or in bad faith, they may be subject to disciplinary actions or other appropriate actions. Should any disclosures or allegations be found to have been made in bad faith, serious disciplinary measures may be taken against the person reporting.

Allegations that are made in good faith but are found to be untrue or unsupported will be dismissed.

Confidentiality

ACIC will treat all reports as confidential to the fullest extent permitted by law, and shall share or disclose information only as required to fully investigate the report and address the issues identified. Upon being reported to ACIC, all acts of sexual violence that occur during Global Affairs Canada (GAC) funded events or projects must & will be reported to GAC within 48 hours. ACIC will never disclose any personal details of the victim/ survivor. For reports to be properly and fully investigated, ACIC encourages persons reporting acts of sexual violence to put their names to reports, but reports may also be made anonymously. Please note that

anonymous reports may limit ACIC's ability to fully investigate acts of sexual violence due to lack of information; GAC is not able to investigate anonymous reports.

Policy Review

This policy will be reviewed once per year for three (3) consecutive years after its original implementation. After the first three years, this policy will be reviewed once every three years or as needed throughout.

Procedures

This policy will be accompanied by a description of procedures and sample reporting forms.

APPENDIX A: DEFINITIONS

Age of consent: In Canada, the general age of consent is 16 years. However, the age of consent is complex and dependant on the context of the relationship and varies under differing circumstances. Therefore, the age of consent may be higher or lower than 16 years. The age of consent may differ in other countries that ACIC works in.

In Canada, any sexual activity without consent is a crime, regardless of age.

Allegation: In this document, "allegation" is used to define a disclosure or report made that someone has committed an act of sexual violence, usually without accompanying evidence. Allegations are different than disclosures and reports.

Bad faith: In this document, "bad faith" refers to an intentionally dishonest disclosure or allegation that is brought forward with a malicious and/or hostile motive meant to bring ill will on other individuals.

Consent: Consent is an active, voluntary and informed agreement to engage in a specific act of sexual activity. Consent must be given clearly, freely and willingly, and it can be withdrawn at any time. Consent cannot be coerced through violence, threats of violence, or by any other means. The absence of a clear "no" does not imply consent. Consent cannot be given if a person is intoxicated, passed out, unconscious, or incapacitated in any other way; a person must have the ability to consent. Consent may be compromised in situations where an individual is in a position of power, trust, or authority over another.

Disclosure: the sharing of new or previously unknown information about an incident of sexual violence. A disclosure may simply be an informal conversation about an experience, or it can be as serious as reporting an experience in order to seek justice.

Minor: A person younger than the age of majority. In Canada, the age of majority differs from province to province but generally varies between the ages 18 and 19. The age of majority, and the status of being a "minor" are different than the age of consent.

Rape culture: Rape culture is a culture in which widely accepted ideas and practices create environments where sexual violence is normalized, expected, and excused. Rape culture blames women for sexual violence perpetrated against them and dictates that men need to be sexually aggressive among other things. Rape culture is perpetuated using jokes about rape, misogynist language and attitudes, disrespect for women and their bodies, and the glamorization of sexual violence. In rape culture, sexual violence is sustained by people in

society who cover up and excuse sexual violence, as well as placing all fault on the victim instead on those who commit the acts of sexual violence.

Rape myths: Rape myths are the predominant way that rape culture persists in society. These myths downplay the seriousness of violence, blame women, and spread untrue and ultimately detrimental information about rape and sexual violence. Because of the prevalence of rape myths, many victims feel they are unable to report their experiences and that they will not be believed if they do report. Examples of rape myths include, but are not limited to:

- Women get assaulted because of what they were wearing at the time of their assault;
- People get assaulted because of how much alcohol and/or drugs they consumed prior to their assault;
- Men cannot be sexually assaulted or fall victim to sexual violence;
- Men can be violent because “boys will be boys”

Report: in this document, “report” refers to a formal disclosure, whether it be written or oral, of an experience of sexual violence to ACIC.

Respondent: the person who is the subject of a disclosure, report, or an allegation.

Sexual abuse¹: Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. All sexual activity with a child is considered as sexual abuse. A child/minor is defined as a person under the age of 18, regardless of the age of majority or age of consent locally. “Physical intrusion” is understood to mean “sexual activity”. “Sexual abuse” is a broad term, which includes a number of acts described in the UN Glossary, including “rape”, “sexual assault”, “sex with a minor”, and “sexual activity with a minor”.

Sexual exploitation¹: Any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another. “Sexual exploitation” is a broad term, which includes a number of acts described in the UN Glossary, including “transactional sex”, “solicitation of transactional sex” and “exploitative relationship”.

Sexual violence: an act attempted or committed against someone without that person’s consent that is usually sexual in nature. It is viewed as any sexual act, attempt to obtain a sexual act, unwanted sexual comments or advances, or acts to traffic a person’s sexuality, using coercion, threats of harm or physical force, by any person regardless or relationship to the victim, in any setting, including but not limited to home and work.

Sexual violence takes many forms. It is important to understand that sexual violence is not synonymous with rape, although it includes rape. Some examples of sexual violence include, but are not limited to:

Indecent exposure: the act of exposing one’s body or coercing another to remove their clothing in a sexually explicit way without the consent of the other person involved.

Non-consensual distribution of personal images or videos: the sending, uploading, or posting of sexually explicit images, videos, or other recordings without the consent of the subject(s) of those images, videos, or recordings.

Sexual assault: the act of touching another person sexually by force and without the consent of the person being touched. Sexual assault can include unwanted kissing, fondling, oral or anal sex, intercourse, other forms of penetration, or any other unwanted

contact of a sexual nature, and can involve the use of weapons or objects. Attempted sexual assault is also considered an act of sexual violence.

Sexual harassment: any kind of unwanted sexual solicitation or sexual attention that can be manifested in many ways including but not limited to unwanted sexual comments including repeated unwanted requests, unwanted sexual touching, or aggressive sexual behaviour. Sexual harassment can consist of a promised reward for engagement in a sexually oriented request or the implied and/or expressed threats of violence towards a person, their friends or their family for refusing to engage in sexual activity. Any single comment or behaviour that is perceived to create a negative psychological or emotional environment for living, working, or studying can be viewed as harassment.

Stalking: the act of repeatedly following or communicating with someone through any means, on one or more occasions, without that person's consent. Any act that instills fear in an individual or that threatens the safety of that individual, their friends, or their families is considered any act of stalking. Stalking can also happen online through social media.

Rape: the act of forcing someone into sexual activity. Rape is a form of sexual assault.

Voyeurism: the act of secretly observing someone who has a reasonable expectation of privacy. Recording someone with hidden devices is also considered voyeurism.

Acts of sexual violence are crimes in Canada and are covered under the Criminal Code of Canada. It is important to note that the laws surrounding sexual violence may differ from county to county where ACIC has international programs, but that our response to staff, volunteers, interns, or any other persons that represent ACIC who experience sexual violence will remain the same, regardless of where the incident occurs.

Survivor-centred: Survivor-centred approaches prioritize the needs and experiences of the victim/survivor. By using survivor-centred approaches, the victim/survivor has the capacity to make their own decisions about the process following their violent experience and if/how they want to be involved in the process.

Trauma-informed: Trauma-informed practices consider the impacts that trauma has on individuals and/or communities. These practices attempt to minimize re-traumatization and to support victims/survivors by limiting the amount of times they need to relive their traumatic experience. Trauma-informed practices avoid and denounce victim-blaming and understand that victims/survivors recover from trauma in different ways and at different paces. Using trauma-informed practices can help facilitate recovery and empowerment for victims/survivors.

Victim/survivor: the person who has experienced sexual violence. We use the term "victim/survivor" to validate the lived experience as a victim with the hopes to empower the victim through their recovery as a survivor.