

**IN THE MATTER OF THE *HUMAN RIGHTS CODE*
R.S.B.C. 1996, c. 210 (as amended)**

**AND IN THE MATTER of a complaint before the
British Columbia Human Rights Tribunal**

BETWEEN:

Glynnis Kirchmeier – and – Glynnis Kirchmeier on behalf of others

COMPLAINANTS

AND:

University of British Columbia

RESPONDENT

**COMPLAINANTS' FINAL SUBMISSIONS
PART 5
January 30, 2026**

PART 5: SYSTEMIC REMEDIES SOUGHT

i. Declaratory relief

1. A declaration that the University's conduct in relation to some or all members of the Mordvinov class was discriminatory.
2. A declaration that the University's conduct in relation to some or all members of the general class was discriminatory.
3. Declaratory relief serves to underline the Tribunal's findings and is important in cases where the specific findings may be quite detailed.

ii. Order to Cease Contraventions

4. As required by the Code, an order that the University cease its contraventions of the *Code* and refrain from committing the same or similar contraventions.

iii. Amendments to University's Response to Complaints of Sexual Misconduct

5. It is our hope that through this Complaint, the Tribunal will emphasize the critical importance responding to findings that the University did not meet the requirements of the *Code* in relation to complaints relating to sexual misconduct, and in so doing discriminated against women making complaints relating to sexual misconduct. The Complainants ask the Tribunal to make orders that will ensure that the University's response will comply with the *Code* in future.

a. Rape Kits

6. Rape kits are not available on campus including at the Hospital on campus. The Complainants ask the Tribunal to order the University to ensure that rape kits and qualified personnel to administer those kits are available at all times on both the Vancouver and Okanagan campuses, or that the University provide and pay for timely transportation to the nearest hospital with this capability.

b. Training Including Regarding *Human Rights Code*

7. The evidence in this case primarily reveals that rather than being trained to understand what the *Code* requires of the University in order to provide and ensure a working, studying and living environment free of harassment and discrimination on the basis of sex, including an environment that is safe for women, and in order to address any deficiencies that are found in the University's environment on these grounds, the University established policies which mostly did not relate to the *Code*, and did not ensure that the users of those policies understood how, if at all, those policies related to the requirements arising from the *Human Rights Code*.

8. The evidence in this case further revealed that almost none of the individuals who might be required to respond to allegations of sexual misconduct had a working knowledge of the *Human Rights Code* or how the requirements of the *Human Rights Code* might translate into requirements for action from them when in receipt of allegations about sexual misconduct. As a consequence, despite being faced with allegations of sexual misconduct which engaged the right of women at the University to work, study and live in a sexual harassment and discrimination free environment, almost none of the University's responders brought a human rights lens or analysis or understanding to the choices they made about how to respond. Some even failed to recognize clear evidence of sexual harassment or sexual assault. The evidence particularly showed that while most individuals could provide a working definition of discrimination as differential treatment on personal characteristics or grounds, almost no one could provide a definition of adverse effect discrimination, and almost no one had even heard the term.

9. This is a complaint about the adverse effect discrimination that occurs when women experience the effects of sexual misconduct in their working, living and studying environment, raise those concerns with the University, and the University does not appropriately respond to those concerns. The inability of responsible parties at the University to understand adverse effect discrimination meant that they did not understand how a failure of the University to respond appropriately caused women additional harm, and prevented the University from properly addressing their concerns and restoring a working, studying and living environment free of harassment and discrimination.

10. First and foremost, then, the Complainants ask the Tribunal to order that the University be directed to provide training on the *Human Rights Code* as relevant to employers and service providers to all persons in positions of authority who might receive concerns of sexual misconduct or be required to address those concerns in any way so that they have a basic understanding of the *Human Rights Code*, including both direct and adverse effect discrimination, are able to consider events from a human right perspective, understand the University's institutional liability for discriminatory circumstances, and are able to think about what is necessary to address concerns of discriminatory conduct and to restore a working, studying and living environment free of discrimination and harassment, including an environment that is safe for women.

11. The Complainants ask the Tribunal to order that this training be provided to at least residence advisors, academic advisors, Administrative Heads of Unit, personnel within departments with special responsibilities to graduate students, University health services workers, front line workers at the Equity and Inclusion Office, front line workers carrying out faculty equity functions (for example in the Faculty of Medicine and the Faculty of Law), front line workers at the Ombudspersons Office, front line workers at the University human resources department, lawyers with the Office of University Counsel, the President, all Vice Presidents and all persons who report directly to Vice Presidents, and workers at SVPRO and the UBC Investigations Office.

12. The Complainants ask the Tribunal to order that this training should include reading and discussion the decision in this matter, in *Hale*, and any future Tribunal decisions regarding sexual misconduct at UBC.

13. The Complainants ask the Tribunal to order this training to be provided to all persons in responsible positions within a year of entering those positions, and at reasonable intervals thereafter. Due to the rapid turn over in some roles, we suggest at least every two years.

14. The Complainants ask the Tribunal to order that this training address the need to act pro-actively to ensure safety and a discrimination-free working, studying and living environments.

15. The Complainants ask the Tribunal to order the University provide training to all responsible persons on how to receive concerns about sexual misconduct, and how to assist the complainant to reach the SVPRO if they want.

16. The Complainants ask the Tribunal to order the University provide training to all responsible persons on assisting complainants and others affected by sexual misconduct allegations, including respondents, and on the impact of trauma and how to act in a trauma-sensitive manner.

17. The Complainants ask the Tribunal to order that the training include training on the basic operations of the University's sexual misconduct policy, its at-risk behaviour policy and other policies regarding safety, discrimination and harassment, including how these policies interact and the means by which these policies are carried out.

18. The Complainants ask the Tribunal to order the training materials should be developed by an expert in sexual misconduct and institutional responses, and should be formally reviewed by a similar expert at least every three years. The Complainants ask the Tribunal to order that the training be delivered by counsel or service providers outside the University. The Board of Governors should be responsible for ensuring these reviews.

19. The Complainants ask the Tribunal to order that in relation to residence staff, the training must explain what falls within their responsibility as service providers, the need to proactively consider the safety of the complainant and others, and common scenarios and the steps to take to mitigate risks of sexual misconduct. The training should explain to residence staff who at the University is the appropriate staff to act, if the residence staff are not.

20. The Complainants further ask the Tribunal to order that the University provide annual training to all new persons in responsible positions about the needs of vulnerable populations in the UBC community, including but not limited to First Nations/Indigenous students, other visible minority students, foreign students, students with disabilities, students who are pregnant or who have children, queer and trans students and other populations defined by the characteristics protected in the *BC Human Rights Code*. This training should be provided to at least residence staff and advisors, academic advisors, academic unit heads, University health services workers, front line workers at the Equity and Inclusion Office, front line workers carrying out faculty equity functions (for example in the Faculty of Medicine and the Faculty of Law), front line workers at the Ombudspersons Office, front line workers at the University human resources department, and workers at the SVPRO and the UBC Investigations Office.

21. The Complainants ask the Tribunal to order that persons retained by the University to assist with any process related to sexual misconduct be screened for knowledge of trauma-sensitive practice and working knowledge of the requirements of the *Human Rights Code* in relation to employers and service providers.

22. The Complainants ask the Tribunal to order that the University work with the Office of the Human Rights Commissioner to ensure that its training meets the requirements of the *Code*.

c. University Policy

23. The evidence in this case shows that the persons attempting to respond to concerns of sexual misconduct did not take an overall view of the information available to them about the problem, and did not turn their minds to what was required to address the concerns arising comprehensively to ensure a working, studying and living environment going forward that was free of discrimination and harassment, and safe for women.

24. The Complainants ask the Tribunal to order that the University must maintain a policy to address concerns of sexual misconduct which begins from the University's obligations under the *Code* to provide a working, studying and living environment that is free of discrimination and harassment, and safe for women, which contains detailed requirements for the steps to be taken once concerns are raised, and which sets out detailed descriptions of the bodies required to respond to sexual misconduct concerns. The Complainants ask the Tribunal to order that that the policy be reviewed and updated periodically. The Complainants ask the Tribunal to order that the policy prohibit sexual misconduct to at least the degree it is prohibited by the *Human Rights Code*.

25. The Complainants ask the Tribunal to order that the policy must cover anyone on the University's campuses, within the University community or with substantial ties to the University. The policy must include students, faculty, staff, fraternity and sorority members, and all University funded, branded or sponsored events and events in which participants identify their University affiliation, including academic conferences.

26. The Complainants ask the Tribunal to order that the policy explicitly state that being off-campus does not prevent the application of the policy and that the policy be available to graduates who were members of the University community at the time of the incidents in their complaints.

27. The Complainants ask the Tribunal to order that the policy be based on a trauma-sensitive, do no harm approach.

28. The Complainants ask the Tribunal to order that the policy prohibit reliance on sexual stereotypes about the conduct, motivation and credibility of complainants and respondents in processing and addressing complaints of sexual misconduct.

29. The Complainants ask the Tribunal to order that the policy recognize the special nature of sexual misconduct and the need for specialized procedures and approaches for sexual misconduct complaints that value the interests of both Respondents and Complainants.

30. The Complainants ask the Tribunal to order that the policy recognize the special nature of the University, including the transience of many members of the University community, the youth and inexperience of many members of the

community, the interdependence of members of the community, the loyalty of many members of the community to the University, the hierarchical nature of the University, the significant presence of relationships among those with unequal power, and the wide discretion often present in the evaluation of scholarly work and the dispersal of University opportunities and benefits.

31. The Complainants ask the Tribunal to order that the policy recognize that the harm of sexual misconduct is not limited to specific individuals who are harassed or assaulted, but extends to others within the University community who witness or become aware of the sexual misconduct.

32. The Complainants ask the Tribunal to order that the policy recognize the risk that persons who experience, disclose, report, witness or become aware of sexual misconduct may be subject to negative consequences, including because they are seen as the problem rather than the behaviour which they are reporting. The Complainants ask the Tribunal to order that the policy prohibit any form of negative consequences as a result of experiencing, disclosing, reporting, witnessing or becoming aware of sexual misconduct.

33. The policy must outline a mechanism by which persons who experience retaliation after experiencing, disclosing, reporting, witnessing or becoming aware of sexual misconduct may report and be protected from retaliation, including at the very a least documented plan to ensure their academic progress is not being adversely affected.

34. The Complainants ask the Tribunal to order that compliance with the sexual misconduct policy be mandatory for all members of the University community under the University calendar and under contracts of employment between members of the University community and the University, regardless of whether or not those members of the community are physically present at the UBC campuses.

35. The Complainants ask the Tribunal to order that the policy permit third party reporting of sexual misconduct, regardless of whether there was direct harm to the third party complainant, on the basis the University's obligation to provide a working, studying and living environment free of discrimination and harassment protects both those directly targeted by sexual misconduct, and those who witness it or are otherwise aware of it.

36. The Complainants ask the Tribunal to order that the policy include the capacity to take measures to protect Complainants and to ensure that they have a working, studying and living environment that is free of discrimination and harassment, including while a complaint is being investigated. The Complainants ask the Tribunal to order that proven allegations not be a precondition for actions to protect Complainants or to provide a working, studying and living environment free of discrimination and discrimination, including while a complaint is being investigated.

37. The Complainants ask the Tribunal to order that the policy require that, in relation to complaints of sexual assault, the Respondent be required to live off-campus until the allegation has been investigated and a finding made about the complaint.

38. The Complainants ask the Tribunal to order that the policy require that, in relation to complaints of sexual assault, if the Respondent shares classes, laboratory space, study areas or any other campus locations with the Complainant, the Respondent will be required to take class remotely, change locations or class schedules, or otherwise accommodate the Complainant's existing classes and locations until the allegation has been investigated, and a finding made about the complaint.

39. The Complainants ask the Tribunal to order that the policy require the University to set reasonable time lines in relation to each complaint, which will only be changed if necessary and with formal written notice to the parties.

40. The Complainants ask that all documentation arising from the above orders be located in a centralized office, be reported periodically to the Board of Governors in anonymized form, and be periodically transmitted to the Ministry responsible for post secondary education.

41. The Complainants ask the Tribunal to order that the policy specify that failure to adhere to the policy is grounds for access to a University fund to support a Complaint to the BC Human Rights Tribunal, including the cost of counsel for the duration of that process, and that access to this fund will be evaluated by an independent person not otherwise involved in the fact-finding process in relation to a complaint.

d. Advocacy Centres

42. The Complainants ask the Tribunal to order the University to establish and fund an advocacy centre for Complainants, which is independent of the University, confidential and privileged, and which provides centralized information and advocacy, including representation, to which any person who has a concern about sexual misconduct will be referred.

43. The Complainants ask the Tribunal to order the University to establish and fund an advocacy centre for Respondents, which is independent of the University, confidential and privileged, and which provides centralized information and advocacy, including representation, to which any person subject to a complaint of sexual misconduct will be referred.

44. The Complainants ask the Tribunal to order that the advocacy centres be equipped and expected to provide comprehensive information about the formal and informal processes available to address complaints of sexual misconduct, including processes external to the University such as criminal processes, human rights processes, civil proceedings in court and public commentary. This information will include how to access these processes and the risks of doing so,

including the risks of public commentary. The advocacy centres must provide information about the significant differences between internal and external processes, including any differences in the protection for complainants and respondents, differences in risk, and any differences in the ability of such processes to consider the University's liability as well as the liability of the person whose conduct is in question.

45. The Complainants ask the Tribunal to order that the advocacy centres be equipped and expected to provide comprehensive information about the supports available both inside and outside the University to Complainants and Respondents, including how to access those supports.

46. The Complainants ask the Tribunal to order that the University provide that all disclosures of conduct that may be sexual misconduct to any responsible party within the University, including third party disclosures, be referred to the Complainant's advocacy centre.

47. The Complainants ask the Tribunal to order that the Complainant's advocacy centre be able to accept third party complaints about instances of conduct that may be sexual misconduct and be able to receive complaints for the purposes of information only.

48. The Complainants ask the Tribunal to order that the University require that all disclosures of conduct that may be sexual misconduct, including third party disclosures, be documented by the Complainant's advocacy centre, whether or not a formal complaint is subsequently prepared or pursued.

49. The Complainants ask the Tribunal to order that when a complaint is received, the University's policy require that an early determination be made about accommodations and services the Complainant and others affected by the complaint may require, and that ongoing assistance is provided to Complainants and others affected as a complaint is being addressed and afterwards if required.

50. The Complainants ask the Tribunal to order that once a person disclosing sexual misconduct has been provided with full information about the options open to them, the Complainant's advocacy centre will assist Complainants who choose to file a formal complaint to create a complete written account of their complaint in such a manner that retelling of the details of the complaint by the Complainant is as limited as possible.

51. The Complainants ask the Tribunal to order that the Complainant's advocacy centre will accept disclosures, reports and complaints broadly and will leave questions about whether conduct amounts to sexual misconduct and jurisdiction to be determined in a formal fact-finding process.

52. The Complainants ask the Tribunal to order that the University's policy ensure that when a written complaint is prepared, an early determination be made by someone other than the fact-finder assigned to the complaint about whether a public warning should be issued about the Respondent and/or the complaint, and

about whether the Respondent should be restricted from the University or from a University residence for the safety of the Complainant or others in the University community while the complaint is in process.

e. Fact Finding Process

53. The Complainants ask the Tribunal to order that the policy establish an independent fact-finding process for complaints of sexual misconduct to proceed by way of interviews, written submissions, and documents rather than by way of an adjudicative process.

54. The Complainants ask the Tribunal to order that the policy ensure that all formal complaints, including third party complaints, be investigated for the purposes of determining the facts and if the formal complaint is substantiated, what remedies and measures would be appropriate.

55. The Complainants ask the Tribunal to order that the policy establish that even though the outcome of the complaint may be disciplinary, the Complainant and the Respondent are both equal, interested parties in the investigative process and must have the same process rights throughout.

56. The Complainants ask the Tribunal to order that the policy establish that the main purpose of the University's investigation of a formal complaint is to determine for both the Complainant and the Respondent what happened and to permit the University to ensure a working, studying and living environment for the complainant and the University community, as necessary, that is free of discrimination and harassment, and is safe.

57. The Complainants ask the Tribunal to order that the policy require the University to consider information about a Respondent in its entirety in order to consider patterns of conduct and risk, and to not consider complaints as isolated incidents.

58. The Complainants ask the Tribunal to order that the policy require that where there are multiple formal complainants about the same respondent, all Complainants will be informed of all complaints, all Complainants will be given access to the complaints process, and all Complainants will be provided with all documents and materials relating to all complaints, except that any Complainant wishing to remain anonymous from the other Complainants may remain so. The Complainants ask the Tribunal to order that the policy require Complainants to keep all information that is not their own confidential, including the identity of other Complainants.

59. The Complainants ask the Tribunal to order that the policy require that where a new formal complaint is made about the same Respondent by a different Complainant, the University will notify the new Complainant about the previous formal complaints, and will notify Complainants in prior formal complaints about the new complaint notwithstanding the status of their prior complaints.

60. The Complainants ask the Tribunal to order that the policy establish that the fact-finding process is confidential except that any party is permitted to comment outside the complaint process about their own information.

61. The Complainants ask the Tribunal to order that the policy require the fact-finding process to be independent from the University, including from University counsel, and to be fully funded by the University.

62. The Complainants ask the Tribunal to order that the policy require the fact-finding process to make findings of fact that are binding on the parties and the University, and to set out remedies that are intended to be followed subject only to the discretion of the President, collective agreement grievance processes, or judicial review by the courts.

63. The Complainants ask the Tribunal to order that the policy require the fact-finding process to be staffed by investigators with competence in human rights law as it applies to sexual misconduct and to service and employment contexts, and trained in trauma-sensitive approaches and best practices for investigations of complaints of sexual misconduct. The Complainants ask the Tribunal to order that the policy provide that investigators will be assisted by an expert in sexual violence.

64. The Complainants ask the Tribunal to order that the policy require University investigators to receive continuing education on annual basis. Applicable training will not be provided by University counsel, but may be provided by University professors in law, criminology, sociology, psychology or other relevant fields.

65. The Complainants ask the Tribunal to order that the policy require that fact-finding not be based on gendered stereotypes about the conduct or response of Complainants or Respondents.

66. The Complainants ask the Tribunal to order that the policy ensure that the fact-finding process focuses on the conduct of the Respondent in relation to the Complainant and the complaint, as well as in relation to the University community. The policy must ensure that the fact-finding process is not based on a disciplinary or criminal model which is focussed primarily on the relationship between the Respondent and the University.

67. The Complainants ask the Tribunal to order that the policy ensure that the fact-finding process limits the Complainant's retelling of the complaint to the greatest extent possible, including by primarily working from the Complainant's written complaint.

68. The Complainants ask the Tribunal to order that the policy ensure that Complainants have the assistance they require through the fact-finding processes, including the assistance of advocates or other support persons at any interviews conducted in the fact-finding process.

69. The Complainants ask the Tribunal to order that the policy require the fact-finding process to be fully transparent to the parties, including ensuring that the fact-finding process proceeds with full cross disclosure to complainants and respondents of complaints, responses, witness information and relevant materials and documents from complainants, respondents, witnesses and the University, even if the University is not a party.

70. The Complainants ask the Tribunal to order that the policy require members of the University community to disclose relevant information to the fact-finding process and the parties, and to participate in the fact-finding process as needed by the investigator.

71. The Complainants ask the Tribunal to order that the policy require the fact-finder to permit the parties to propose questions for the other parties, and to ask those questions unless they would be harmful to a party or the process.

72. The Complainants ask the Tribunal to order that the policy ensure that information obtained by interview is summarized and shared with other parties who may respond to or correct that information.

73. The Complainants ask the Tribunal to order that the policy ensure that the investigator provides a draft report of their findings to all parties for comment before the report is finalized.

74. The Complainants ask the Tribunal to order that the policy ensure that once the report is finalized, all parties and the University, even if not a party, may make submissions about remedial orders to be made.

75. The Complainants ask the Tribunal to order that the policy require that the ultimate outcome of each complaint, including all steps taken by the University in respect of the complaint, be provided to the parties.

76. The Complainants ask the Tribunal to order that the policy require that the findings of fact and decision on remedy in relation to an investigation be made public unless there are compelling reasons not to do this.

77. The Complainants ask the Tribunal to order that the policy provide that either party may address the findings through a grievance or judicial review if they are dissatisfied with the process or outcome.

78. The Complainants ask the Tribunal to order that the policy require that the advocacy centres provide information about how to access judicial review and grievance processes, as applicable, once a final decision on an investigation has been made.

79. The Complainants ask the Tribunal to order that the policy establish that materials generated for the investigation process, including complaints, responses, interviews and non-documentary evidence provided in the fact-finding process are privileged, and cannot be the basis of civil liability or any other complaint process.

80. The Complainants ask the Tribunal to order that the policy prohibit any negative consequence or response related to making a complaint, responding to a complaint, or providing evidence in a complaint fact-finding process.

f. Implementation

81. The Complainants ask the Tribunal to order that the University ensure its current policies conform to the Tribunal's orders about its policies and procedures within a specified time, after which the Complainant will be at liberty to raise the issue with the Tribunal as a failure to implement the Tribunal's decision.

82. The Complainants ask the Tribunal to order that once every three years the University hire an external expert to review its sexual misconduct, harassment and safety policies and provide a report about the policies and any changes that are required. Such expert should be ordered to report directly to the Board of Governors and the expert will incorporate feedback on the policies by the AMS.

83. The Complainants ask the Tribunal to order that the University publish, in a readily accessible online form, organization charts for SVPRO, the investigations office, residence staff and advisors, security staff, the Equity and Inclusion office, the Ombudsperson's office and the Office of University Counsel, including the names of those to whom staff and departments report.

84. The Complainants ask the Tribunal to order that the University conduct annual reviews of staff designated to handle sexual misconduct complaints to ensure that their knowledge of trauma informed practice, University policies relating to sexual misconduct and safety, and basic human rights principles applying to service providers and employers is current. This should include at least, front line workers at the Equity and Inclusion Office, front line workers carrying out faculty equity functions (for example in the Faculty of Medicine and the Faculty of Law), front line workers at the Ombudspersons Office, front line workers at the University human resources department, lawyers with the Office of University Counsel, the President, all Vice Presidents and all persons who report directly to Vice Presidents, staff of the Office of the University Counsel, and workers at SVPRO and the UBC Investigations Office.

85. The Complainants ask the Tribunal to order that the University establish a fund for complainants to access to file complaints to the BC Human Rights Tribunal if the University does not follow its policies in relation to handling any sexual misconduct complaint, including in relation to protecting the safety of Complainants and other members of the University community.

iv. Data Gathering, Oversight and Accountability

86. The Complainants ask the Tribunal to order the University to conduct annual surveys within the University community to investigate the incidence of sexual misconduct at the University, whether sexual misconduct is being reported,

the reasons sexual misconduct is or is not being reported, and whether the University's response mechanisms are working.

87. The Complainants ask the Tribunal to order that this survey be developed by an expert in climate surveys for sexual misconduct, and address the role of front line workers at the Equity and Inclusion Office, front line workers carrying out faculty equity functions (for example in the Faculty of Medicine and the Faculty of Law), front line workers at the Ombudspersons Office, front line workers at the University human resources department, lawyers with the Office of University Counsel, the President, all Vice Presidents and all persons who report directly to Vice Presidents, and workers at SVPRO and the UBC Investigations Office.

88. The Complainants ask the Tribunal to order that this survey, like others routinely implemented by the University, be sent to all students, staff and faculty electronically with an option to decline participation.

89. The Complainants ask the Tribunal to order that the results of this survey be reported by an expert in reporting climate surveys and be published in a readily available and ongoing electronic online format and in paper format posted at UBC library branches, the SVPRO, and the investigation office, and further that the annual results be transmitted to the Ministry for post secondary education.

90. The Complainants ask the Tribunal to order that the report include commentary on year over year comparisons and comparisons to the best available academic research on sexual misconduct at the time.

91. The Complainants ask the Tribunal to order that the University provide an annual response to the annual survey setting out what it was done in the prior year in relation to the previous survey, and what will be done in the present year in relation to the current survey.

92. The Complainants ask the Tribunal to order that the University compile and publish in a defined location general information about sexual misconduct concerns that do not rise to the level of formal complaints but come to the attention of the University from time to time, including through social media and other online sources. This information should be provided publicly so that members of the University can take informed precautions.

93. The Complainants ask the Tribunal to order that the University hire an external person to provide an annual independent evaluation of the University's reporting, advocacy and fact-finding processes in relation to disclosures and complaints of sexual misconduct, including publishing annual statistics about disclosures of sexual misconduct received, formal complaints about sexual misconduct received, formal complaint investigations completed, the outcome of those investigations, and how the disclosed and reported instances of sexual misconduct compare to the anticipated rate of sexual misconduct based on best available current research.

94. The Complainants ask the Tribunal to order that this work be carried out by an expert in institutional responses to sexual misconduct who does not do other work for the University, and include surveying participants in the sexual misconduct complaint process.

95. The Complainants ask the Tribunal to order that these evaluations be published in a readily accessible online form and be presented to the Board of Governors. The Complainants ask the Tribunal to order that the Board of Governors be responsible for improving the University's sexual misconduct response mechanisms.