

CENTRAL EGLINTON CHILDREN'S CENTRE

WORKPLACE HARASSMENT & VIOLENCE PREVENTION POLICY

Date Policy and Procedures Updated: July 4, 2025

Date Policy and Procedures Established: February 14, 2023

POLICY STATEMENT:

Central Eglinton Children's Centre considers the health and safety of our employees paramount. Priority is given to protecting our employees, placement students, clients, and visitors from harassment, bullying, discrimination, and violence. Such conduct interferes with everyone's ability to perform their responsibilities and is not in keeping with the organization's philosophy of trust and mutual respect. By working together and giving the utmost attention to the safety and well-being of each other, we will meet our shared objective of a healthier and safer working environment for all.

Under the *Occupational Health and Safety Act*, and for purposes of this policy, both unpaid students from a post-secondary institution and unpaid secondary school students who are participating in a placement program at the organization are considered employees and therefore covered under this policy.

This policy applies to all employees, placement students, Board members, clients/parents, guardians, volunteers, and representatives of the organization while in the workplace, during work-related field trips or travel, or during any work-related or social functions.

The organization will not tolerate incidents of workplace harassment, virtual harassment, bullying, violence, and discrimination involving its employees, volunteers, placement students, members of the Board of Directors, clients/parents and community members and will take action to prevent occurrences. Employees who are found to have engaged in workplace harassment, including virtual harassment, bullying, violence, or discrimination, will be subject to a wide range of disciplinary actions, up to and including termination of employment with cause. Legal authorities may also be alerted if appropriate.

The organization's employees and clients are entitled to be treated with dignity and respect and have a work environment free from harassment and discrimination as prescribed by the *Human Rights Code* in Ontario and the *Occupational Health and Safety Act*, as amended.

Employees are expected to assist the organization in its attempts to prevent and eliminate harassment and bullying in the workplace. The organization will take seriously any form of harassment or bullying that occurs in the workplace, virtually, and on social media, irrespective of the alleged perpetrator's position.

Nothing in this policy limits an individual's right to file a complaint with the Human Rights Commission or the Ministry of Labour should they feel the situation warrants such action.

PROHIBITED CONDUCT – WORKPLACE HARASSMENT/BULLYING, PROHIBITED GROUNDS OF DISCRIMINATION, AND VIOLENCE

All forms of harassment, including virtual harassment, bullying, violence, and discrimination, are prohibited. Employees who are found to have engaged in any of these prohibited activities are subject to discipline, up to and including termination with cause.

The *Occupational Health and Safety Act* defines workplace harassment as “engaging in a course of vexatious comment or conduct against a worker in a workplace, including virtually through the use of information and communications technology that is known or ought reasonably to be known to be unwelcome, or workplace sexual harassment.” Employees are required to participate in training, including the workplace harassment policy.

“Workplace sexual harassment” is defined as:

- (a) Engaging in a course of vexatious comment or engagement in conduct against a worker in a workplace including virtually through the use of information and communications technology because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or
- (b) Making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant, or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

Human Rights Code -Discrimination and Harassment

Central Eglinton Children's Centre prohibits discrimination and harassment in accordance with the prohibited grounds established in the current version of the *Human Rights Code*, including but not limited to: **Citizenship, Race, Place of Origin, Ethnic Origin, Colour, Ancestry, Disability, Age, Creed, Sex, Pregnancy, Family Status, Marital Status, Sexual Orientation, Gender Identity, Gender Expression, Receipt of Public Assistance, Record of Offense.**

Workplace harassment includes, but is not limited to:

- a) Any verbal or physical conduct that may reasonably be perceived as denigrating or showing hostility or aversion toward an individual based on a prohibited ground or other status protected by law, or because of the protected status of the individual's relatives, friends, or associates

- b) Epithets, slurs, negative stereotyping, demeaning comments, including comments pertaining to a person's dress, accent, or other cultural differences, or intimidating acts that are based on an individual's protected status
- c) Written or graphic material (whether by printed or electronic media) circulated within or posted within the workplace or on social media that shows hostility toward or is demeaning to an individual or group because of his or her protected status.

Sexual Assault is the use of threat or violence to force one individual to touch, kiss, fondle, or have sexual intercourse with another. Examples of sexual assault include, but are not limited to:

- *Touching, which is committed in circumstances of a sexual nature* ·
- *The threatened use of violence to force a person to engage in sexual conduct*

Poisoned Work Environment is a hostile and abusive work environment resulting from harassment by comment or conduct that ridicules or demeans an individual or specific group of employees, for example, racial slurs or derogatory comments about sexual orientation. It can also include actions or inactions that create or can be interpreted as creating an offensive term or condition of employment or continued employment. The offending action does not need to be directed at the individual who claims to be harassed.

Workplace is defined as any location where business-related activities occur, including social events and activities. In certain circumstances, discrimination or harassment or bullying that occurs outside of the workplace may also be prohibited by this policy.

EXAMPLES OF PROHIBITED BEHAVIOURS

Workplace harassment/bullying may be verbal, physical, deliberate, unsolicited, or unwelcome. It may be one incident or a series of incidents. The following are examples of behaviours that may constitute workplace harassment, but is not an exhaustive list:

- *Differential treatment of employees or co-workers based on a prohibited ground*
- *Verbal or written comments, jokes, teasing, and/or other communication of a sexual nature*
- *Cyberbullying or harassment that takes place online*
- *Offensive or intimidating phone calls or emails*
- *Spreading of malicious rumours or gossip about an individual or group*
- *Verbally abusive behaviour such as yelling, insults, ridicule, and name-calling, including remarks, jokes, or innuendos that demean, ridicule, intimidate, or offend*
- *Demeaning language based on gender or sexual orientation*
- *Graphic comments about an individual's body*
- *The use of sexually degrading words to describe an individual*
- *The display of sexually suggestive objects and/or pictures in the workplace*
- *Foul or obscene language and/or gestures*
- *Unwanted physical conduct such as patting, pinching, and/or brushing up against another person's body*
- *A promise of better treatment in return for sexual favours*
- *Indirect or expressed threats for refusal of a sexual request*

- *Forms of sexual violence including physical advances, pinching, brushing against, touching, patting, or leering that makes a person feel humiliated, intimidated, or uncomfortable*
- *Leering (suggestive staring)*
- *Unwelcome inquiries or comments about a person's sex life*
- *Inappropriate or unwelcome focus/comments on a person's physical attributes or appearance*
- *Persistent unwanted contact or attention after the end of a "consensual" relationship*
- *Verbal threats or intimidation*
- *Verbal abuse, including swearing or shouting offensively at a person*
- *Kicking, punching, scratching, biting, squeezing, pinching, battering, hitting or wounding a person in any way*
- *Attack with any type of weapon*
- *Spitting at a person*
- *Threatening behaviour such as shaking fists or throwing objects*
- *Vandalizing, sabotaging, or tampering with someone else's work, equipment, or personal belongings*
- *Abusing authority*
- *Making false allegations about someone in memos or other work-related documents*

WHAT THIS POLICY DOES NOT COVER

This policy does not prohibit reasonable action or conduct by a management or supervisory employee that falls within that employee's job functions and responsibilities, including performance reviews, work direction, work assignments, scheduling, workplace inspections, counseling, request for medical documentation in support of an absence from work, and disciplinary action.

This policy does not prohibit differences of opinion, disagreements, and isolated acts of rudeness between employees. Normal workplace conflict itself does not constitute harassment.

TEST OF HARASSMENT

It does not matter whether you intended to offend someone. The test of harassment is whether you knew or *should have known* that the comments, behaviours, or conduct were unwelcome to the other person.

Inappropriate workplace behaviour or conduct that does not rise to the level of workplace harassment or creates a poisoned work environment will not be tolerated and will be treated as a performance issue.

RESPONSIBILITIES OF BOARD MEMBERS, DIRECTORS/DESIGNATES

1. Promote a workplace free of discrimination and harassment/and bullying.
2. Provide employees, placement students, and volunteers with training and education regarding the policy with respect to workplace discrimination, harassment, bullying, and violence, including appropriate steps to be taken and investigation procedures.
3. Provide clients/parents with a Parent Code of Conduct and information regarding this policy in the parent handbook. Parents will be informed about expectations regarding respectful behaviour in the workplace and our anti-discrimination, harassment, bullying, and violence

policies as well as the steps that will be taken to investigate claims of harassment, bullying or inappropriate behaviour towards employees.

4. Take every reasonable precaution and appropriate measure for the protection of the workers.
5. Ensure employees understand who to contact regarding concerns about the policy or when to report an incident.
6. Model behaviour, which helps support a positive work environment.
7. Respond to complaints or incidents brought to their attention within 7 days of receipt.
8. Investigate incidents and complaints in a manner that is appropriate in the circumstances (as described more fully below).
9. Ensuring this policy is applied in a timely, consistent manner and maintains confidentiality to the extent possible.
10. Document all information and investigation results relating to workplace discrimination, bullying, and harassment.
11. Request that an investigation into allegations of discrimination, bullying, and harassment be conducted, where appropriate.
12. Act according to this policy if witnessing harassment or elements of a poisoned work environment.
13. Take action if witness to discrimination, bullying, or harassment in the workplace.
14. Initiate negotiated resolution within 45 days of receipt of notice.
15. Provide monthly status updates to the parties on the status of the resolution process.

RESPONSIBILITIES OF JOINT HEALTH & SAFETY COMMITTEE

1. With the Board Members and Executive Directors, review and update this policy as required, at least every three years.
2. Jointly develop and implement a workplace harassment and violence prevention training programme. Review and update it at least every three years.
3. Conduct a workplace risk assessment at least every five years to identify any new risks that should be addressed.
4. Jointly develop and provide training for procedures to be used to mitigate these risks: ex threat of intimate partner violence carrying over to the workplace
5. Adhere to all Regulations.

RESPONSIBILITIES OF EMPLOYEE

1. Comply with this policy and all related procedures for both their personal protection and the protection of others in the workplace.
2. Take part in all training and education programs offered by the organization to respond suitably to any incident of workplace violence and harassment.
3. Ask questions if any part of the policy or process is not understood.
4. Immediately report any incidents or threats of harassment, discrimination, or bullying in the workplace and online.
5. Avoid any behaviour or conduct that could reasonably be interpreted as a violation of this policy.

6. Notify the Director/Supervisor or the Board of Directors if they have concerns about workplace discrimination, bullying, and/or harassment.
7. Co-operate fully in any investigation conducted under this policy.
8. Maintain confidentiality of the information shared throughout the process if they are involved in an investigation under this policy and program.
9. Treating others with respect in the workplace and refraining from perpetrating harassment and bullying in the workplace.

PROCESS FOR MAKING DISCRIMINATION, HARASSMENT, OR VIOLENCE COMPLAINTS

If an employee witnesses or experiences an incident of discrimination, workplace harassment, bullying, toxic behaviour, or violence, they have a responsibility to:

- If safe to do so, make the objection clearly known to the offender and ask the individual to stop the behaviour.
- Promptly report the behavior to one of the Directors or Designate
- Bring their complaint to any member of the Board of Directors if a Director is the person that is the alleged offending party.

REPORTING WORKPLACE HARASSMENT AND PROCESS FOR MAKING HARASSMENT COMPLAINTS

Step 1: ASK THE PERSON TO STOP

- If an employee experiences offensive, discriminatory bullying, or harassing conduct in the workplace or online from a co-worker, member of management, clients/parents, guardians, or any other person, ask the offender to stop engaging in the conduct in question.

Step 2: INFORMAL RESOLUTION OF INCIDENT OR COMPLAINT

- In certain circumstances, an employee may feel uncomfortable asking the individual to stop engaging in the offending behaviour. In this case, the behaviour should be directly reported in writing to the Directors - centraleglinton@gmail.com

The report must include:

- the name of the principal party and the responding party (if known)
- the date of the occurrence
- a detailed description of the occurrence

If an employee or individual is not able to provide this information in written form, they may provide this information to the Directors verbally. The information will then be transcribed.

Please note that, to proceed with the resolution process, it is mandatory to provide the name or identity of the principal party who was involved in the occurrence. If you do not provide the name or identity of the principal party, the occurrence will not be further reviewed.

CECC cannot reveal the identities of the parties involved in the resolution process for an occurrence to the JHSC without the consent of the parties. However, the identities of the parties may be revealed to each other as part of the resolution process.

- In the case of an incident or complaint against a Director, the employee should contact the Board of Directors through the Chairperson and outline their complaint in writing - ceccchair2015@gmail.com
- All complaints and incidents of harassment, bullying, and discrimination will be reviewed by the appropriate person, and in some instances, informal resolution methods may be explored if both parties are amenable to engaging in this process.

Step 3: FORMAL INVESTIGATION PROCESS

1. All complaints or incidents that come to the attention of the Directors or Board of Directors will be investigated promptly, in a manner appropriate to the circumstances. If the complaint is against one of the Executive Directors, the Board of Directors will determine whether the investigation will be conducted by a Board member or an impartial external third party. Any complaints or incidents that are brought forward through an exit interview or through an employee resigning will still be investigated in a manner appropriate to the circumstances.
2. All employees who are directly involved in or who witnessed the alleged incident will be interviewed.
3. Notes/statements will be prepared during each interview, reviewed by the person(s) being interviewed and signed for accuracy.
4. Records or other documents relevant to the incident being investigated (this may include work schedules, complaints, and observation notes, and may involve taking pictures of the scene) will be reviewed.
5. Relevant organizational policies/procedures will be reviewed.
6. A summary report will be created including a general description of the occurrence, their conclusions and their recommendations to eliminate or minimize the risk of a similar occurrence.
7. Both the complainant and the alleged harasser will be informed in writing of the results of the investigation and any corrective action to be taken
8. CECC will then provide a copy of this report to the principal party, responding party and the JHSC. The report will not reveal, directly or indirectly, the identity of the persons who were involved in the occurrence or the resolution process for the occurrence.
9. The Directors and the JHSC will then meet to determine which of the recommendations in the report are to be implemented. CECC will implement those recommendations within 1 year of receiving the notice of occurrence.
10. Depending on the scope of the investigation, employees may need to seek the assistance of the Directors, an appropriate Board member, or a Health and Safety representative, if appropriate.

CORRECTIVE ACTION

Any employee found to have engaged in conduct that violates this policy and program will be subject to discipline, up to and including termination of employment. Because allegations of discrimination

and harassment are very serious, frivolous complaints found to have been made for improper purposes will result in disciplinary action being taken against the complainant.

Any parents/guardians found to have engaged in conduct that violates this policy will be subject to consequences, including possible removal from the program.

CONFIDENTIALITY

Employees should feel secure knowing that their concerns will be handled discreetly and sensitively. To the extent possible, employee complaints will be kept confidential. Details of complaints and identifying information may need to be disclosed to investigate a complaint or incident, take corrective action, or as may be required by law.

For example, to ensure that the respondent is given a fair opportunity to respond, the identity of the complainant and details of the complaint will be disclosed to the respondent. In addition, on occasion, an investigation may require consulting with another employee, the Executive Directors (or designate), or the Board of Directors, to ensure an appropriate resolution. In such cases, the employee will be advised of the disclosure before involving others.

REPRISALS

This policy strictly prohibits reprisals against an employee who has brought forward a legitimate concern or has provided information regarding a concern under this policy and program. Any employee who commits or threatens reprisal against another employee in response to a complaint being made will be subject to discipline, up to and including dismissal with cause.

RESPONSES TO MISCONDUCT UNDER THIS POLICY

Central Eglinton Children's Centre considers the following to be misconduct, which will result in counseling or disciplinary action, up to and including termination of employment:

- Any incident of discrimination or harassment/bullying that is prohibited under this policy.
- Any failure to take appropriate action by a Supervisor/Executive who is, or reasonably should be, aware of discrimination, bullying, or harassment that is prohibited by this policy.
- Any failure by an employee to co-operate with the investigation or resolution of a complaint under this policy.
- Any interference by an employee with the investigation or resolution of a complaint or incident.
- Any inappropriate behaviour or misconduct that may lead to a poisoned work environment
- Any act of reprisal taken by an employee against another employee.

For clarity, however, any claim or complaint of a violation of this policy that is made in bad faith will be subject to disciplinary action, up to and including termination of employment.

SUPPORT MEASURES

Employees can access a list of medical, psychological, or other support services through CECC's extended health benefits. Supports and resources related to family violence are available at [Ending Violence Canada - Support Services](#).

REPRESENTATION

At any time during the resolution process, an employee may be accompanied or represented by a friend, partner, colleague or person of their choosing

COMPLAINTS RELATED TO EMPLOYER NON-COMPLIANCE with the Code or Regulations

In accordance with section 127.1 of the Code or Regulations, if you, as an employee believe that there has been a contravention of the Code as it relates to an occurrence of harassment and violence, you may make either a verbal or a written complaint to CECC's director/assistant directors, JHSC certified management representative, or board of directors. You can reach CECC at 416 440-0383 or centraleglinton@rogers.com.

EDUCATION

Central Eglinton Children's Centre commits to making sure all its employees, placement students, clients, parents/guardians, and volunteers are familiar with this policy and receive training on how to keep the work environment free from harassment, bullying, and discrimination including ways to promote a positive work environment. The training will take place within three months of the start of employment and at least every three years thereafter.

MONITORING & REVIEW

Central Eglinton Children's Centre will monitor this policy and update it whenever necessary. The policy, along with other relevant policies, will be reviewed with all employees, placement students, clients, and volunteers on an annual basis. If an employee has any concerns with this policy, they should bring it to the attention of the Directors or the Board of Directors.