

SCOPE: This policy applies to all agency staff, third party staff, students, volunteers, family members, visitors, and contractors.

2. Workplace Harassment, Discrimination & Violence

POLICY: The agency is committed to providing a safe, healthy, and supportive working environment in which all people are treated with dignity and respect, and without discrimination, consistent with the Ontario Human Rights Code (the “Code”) and the Occupational Health and Safety Act (“OHS”). This policy shall be posted in a visible location in the workplace.

PROCEDURES:

- The agency will take all reasonable steps to protect staff, students, volunteers and people supported from discrimination, violence, and harassment and will investigate and appropriately respond to discrimination, violence, and harassment in the workplace.
- The agency will establish procedures to reduce the risk of discrimination, violence, and harassment in the workplace and to foster workplace safety and security.
- The agency recognizes that it has a duty to provide all of its staff, students, volunteers, and people supported with a safe, healthy, and harassment-free workplace.
- Both the agency, as an organization, and the people in the scope of this policy have an obligation to work together to ensure workplace safety. This means that all parties have a duty to report any unsafe situations to their supervisor. It is then the responsibility of the supervisor and/or management to act to ensure worker safety.
- The agency has a unique mission that brings with it unique challenges. This agency provides services to people who also have an intellectual disability. The agency recognizes that all parties may be faced with situations where they are supporting people who may act out in a manner that puts the safety of other people at risk. With appropriate training and management these incidents can be minimized, but may not be eliminated altogether. All parties are responsible for ensuring familiarity with CPI/Escalation Protocols and/or Behavioural Support Plans and Ministry-approved techniques implemented by the agency for dealing with such situations, and shall refer to the Interventions for Challenging Behaviour policy and the Orientation, Training, Professional Development, and Education Bursary policy.
- Where workplace harassment, discrimination, or violence relates to a person supported, the procedures and reporting requirements applicable to any such person shall be subject to the agency’s policies in relation to Serious Occurrence Reporting, Abuse Prevention and Reporting, any applicable requirements under the terms of the *Quality Assurance Measures Regulation* and the *Social Inclusion Act*, and any policy directives of the Ministry of Children, Community and Social Services.

Program to Address Workplace Harassment, Violence and Discrimination

- The agency is committed to preventing, investigating, and appropriately responding to workplace harassment, violence, and discrimination and will not tolerate prohibited behaviour (as defined) in the workplace. All reports of prohibited behaviour will be investigated by the organization in a fair, objective, respectful, and timely manner. The program has been designed to assist the agency in achieving this goal.

Implementation and Responsibilities

Frontline Staff, Student and Volunteer Responsibilities:

- The agency's front-line staff, students, and volunteers have a responsibility to:
 - Review and follow the procedures set out in this policy.
 - Refrain from acts of prohibited behaviour or acts that pose the risk of an incident of prohibited behaviour.
 - Attend and participate in all training with respect to the prevention of discrimination, violence, and harassment in addition to other training that is provided.
 - Immediately report any incidents, threats, or potential risks of workplace violence or harassment.
 - Immediately advise management and coworkers if they become aware of a change in circumstances that is likely to increase the potential for aggressive behaviour.
 - Report any concerns regarding safety procedures that are in place to protect staff, students, and volunteers.
 - Immediately report any incidents of retaliation for having brought forward a complaint of prohibited behaviour.
 - Cooperate with and participate in any investigations under this Policy as directed by Executive Director and/or designate.

Management Responsibilities:

- Management has a responsibility to:
 - Review and follow the procedures set out in this policy.
 - Ensure staff, students, and volunteers participate in training to prevent, identify, and respond to any incidents of prohibited behaviour.
 - Ensure that any incident of prohibited behaviour is immediately reported.
 - Identify and implement appropriate procedures to minimize the risk of prohibited behaviour and the risk of workplace violence or harassment to staff, students, volunteers and people supported.
 - Identify, minimize, and inform staff, students, and volunteers regarding potential areas of risk of workplace violence or harassment that threaten a safe work environment.
 - Report any incidents of prohibited behaviour to the Executive Director or designate.
 - Report to the Executive Director and/or designate any information or concerns regarding potential domestic abuse that would expose a co-worker to physical injury.
 - Report any concerns regarding safety procedures that are in place to protect staff, students, and volunteers.
 - In consultation with the Executive Director and/or designate, speak to individuals who have allegedly committed prohibited behaviour in order to prevent or stop the conduct and resolve the conflict.
 - Co-operate with any investigations under this policy.

Executive Director and/or Designate Responsibilities:

- The Executive Director and/or designate will be responsible to ensure implementation of this policy and the program, and will work with all Health and Safety Representatives and/or a Joint Health and Safety Committee ("JHSC") where applicable.

- It is the Executive Director's and/or designates responsibility to:
 - Inform and educate staff, students, volunteers and management about this policy.
 - Initiate, conduct, and administer any investigations under this policy.
 - Determine and implement appropriate corrective and/or disciplinary action in consultation with the appropriate managerial personnel.
 - Ensure that management is held accountable for implementing this policy.
 - Ensure that risk assessments are completed as required.
 - Ensure that all statutory reporting requirements are met, should an incident occur.

Violence Prevention and Safety Measures

General Precautions:

- The agency endeavours to ensure the safety of all staff, students, and volunteers. To that end, all staff, students, and volunteers are required to take the following measures:
 - Follow the agency's Health and Safety policy, procedures, and standards.
 - Follow any applicable sign-in procedure and let co-workers know of each other's whereabouts.
 - Upon recognition of any safety risks in the workplace (i.e. a stranger), advise management immediately.
 - Familiarize yourself with the location of all exits.
 - At all times use work safe practices and be aware of your surroundings.

Emergency Protocols:

- If a co-worker, contractor, third party service provider, or member of the public engages in an act of violence in the workplace, or there is a reasonable belief that such an act of violence is likely to occur, a staff member that has this knowledge must immediately remove themselves and people supported from the unsafe situation and contact emergency services where appropriate.
- Telephones are located in various places in the workplace. Staff, students and volunteers must be familiar with the locations of the telephones and cell phones.
- Each work site has the telephone numbers of all agency sites or people to call for support. Every site has designated other sites or people to call for support. There is an on-call system Friday evening to Monday morning.
- For immediate assistance, contact Emergency Services: 9-1-1

Disclosure of Risk of Violent Behaviour:

- If a staff member is expected to encounter a person supported with a history of violent behaviour of which the agency is aware and/or the agency is otherwise aware that the person supported poses a risk of workplace violence, the agency will provide such information to the worker. The agency will only disclose the information reasonably necessary to protect staff, students, and volunteers from violence.
- The agency will provide paid training including any Ministry-required training to staff at the agency's expense within one month of commencing work and before they will be required to work alone. This training will include, but not be limited to, the causes of aggression, the factors that precipitate aggression, recognition of warning signs, prevention of escalation, controlling and diffusing aggressive situations, as well as details of the employer's policies, measures, and procedures designed to deal with aggression, including reference to the availability of the Employee Assistance Program (EAP).
- Appropriate protocols will be prepared, staff, students, and volunteers will be oriented, and protocols must be followed in such circumstances.
- Adequate staffing will be provided by the employer in situations where the employer has

determined that the behaviour of a person supported places the person or others at risk.

Risk Assessments:

- The agency will assess the risk of workplace violence in consultation with the Health and Safety Representative as required. Risk assessments will be conducted as often as is necessary. If risks of violence are found during the assessment, the agency will work with the Health and Safety Representative to determine and implement appropriate measures to minimize the risk. Results of the risk assessment will be reported to the appropriate Director and Executive Director and/or designate.

Prohibited Behaviour Complaint and Investigation Procedure

Reporting:

- **Reporting Discrimination, Violence, or Harassment in the Workplace:**
 - Any staff, student, or volunteer who is subjected to, is a witness of, or has knowledge of, any incidents or threats of workplace violence, harassment, or discrimination are required to immediately report the incident to management. This includes reporting domestic violence situations that would likely expose staff, student or volunteer to physical injury in the workplace.
 - **The reporting requirements are as follows:**
 - All incidents of prohibited behaviour as defined in this policy shall be immediately reported to management.
 - The member of management receiving the report shall take steps to ensure that the appropriate measures are taken to safeguard co-workers and people supported, including, if necessary, contacting the authorities or emergency services.
 - Upon being informed of an incident by the worker, the appropriate Director will report the incident to the Executive Director and/or designate.
 - Upon the Executive Director and/or designate's direction, management will comply with all reporting obligations under the *Occupational Health and Safety Act* and *Workplace Safety and Insurance Act*.
 - Any staff, student, or volunteer failing to immediately report knowledge of an act of prohibited behaviour to a member of management may be subject to disciplinary action up to and including dismissal.
 - Reporting of any behaviour, which could constitute abuse of people supported, shall comply with the agency's policies in relation to Abuse Prevention and Reporting and obligations for serious occurrence reporting consistent with the *Quality Assurance Measures Regulation* under the *Social Inclusion Act*.
- **Who to Report Workplace Prohibited Behaviour to:**
 - An incident or complaint of prohibited behaviour should be reported as soon as possible after experiencing or witnessing an incident.
 - A prohibited behaviour incident or complaint can be made to a staff, student or volunteer's supervisor.
 - In the case that the staff, students and volunteer's supervisor is the person engaging in the workplace violence and harassment a staff, student, or volunteer can report the incident or complaint to any member of the management team, the Director of Human Resources, or the Executive Director.
 - If the Executive Director is the person engaging in the prohibited behaviour, the

staff, volunteer, or student can contact the Director of Human Resources who will report to the Chair of the Board of Directors, or if the Chair of the Board of Directors is the person allegedly engaging in the prohibited behaviour, then the Ministry of Labour should be contacted.

Investigation Procedure:

An incident or complaint of prohibited behaviour will be investigated promptly and impartially..

- The agency shall complete an investigation that is appropriate to the circumstances and the allegations.
- Upon receipt of a written complaint of harassment, discrimination, or workplace violence made to the Executive Director and/or designate, they will appoint an investigator (either a member of management or an external investigator, as appropriate in the circumstances due to, among other things, the complexity of the investigation, the possibility of a conflict of interest, or operational requirements of the agency) to conduct an investigation into the incident. The investigator will be an individual with the ability to conduct an objective investigation. Under no circumstances shall the investigator be the person alleged to have engaged in the prohibited behaviour, nor will the investigator be anyone with direct involvement with the complaint. The investigation shall also not be completed by any party who is under the direct supervision of the party accused of harassment.
- **Wherever possible and reasonable, the investigation shall be completed within 90 business days** of the date the complaint is made, unless extenuating circumstances warrant a longer investigation (i.e. illness, vacation time off, complex investigation)
- While the investigation is ongoing, all parties involved will be instructed not to discuss the complaint, incident, or investigation with other staff, students, volunteers, or witnesses unless necessary to obtain advice about their rights.
- The investigator will ensure that the investigation is kept confidential and that identifying information is not disclosed unless necessary to conduct the investigation or as required by law. The investigator will remind the worker who has allegedly experienced workplace harassment, the alleged harasser(s), and any witnesses of the requirement that they keep the information shared during the investigation process confidential and the prohibitions against retaliation against any person taking part in the investigation or making a complaint.

Complaints:

- Upon receiving a report of an incident of prohibited behaviour the person receiving the report will as soon as possible report the incident to management. Management will have the person complete a written report regarding the incident.
- The report must be signed by the staff, student or volunteer who submitted to management (or the next higher-ranking where a member of management is implicated). The report shall include:
 - Name(s) of complainants and contact information.
 - Names of respondent(s), position(s) held, and contact information if known.
 - Names of witness(es) if any, and other persons with relevant information and contact information if known.
 - Details of what happened including dates, frequency, and locations of alleged incidents.
 - Supporting documentation must be provided.
 - List of any documents another person may have.
- The agency's practice is that staff, students and volunteers must fill out a written report for each incident. Please use the Complaint/Feedback Form, which is located in the

Forms folder on the network's P drive, website and main filing cabinet.

- If the staff needs further assistance, they may contact a Health and Safety Representative, or they may utilize the services of the agency's Employee Assistance Provider.

Interim Measures:

- Upon receipt of a Complaint/Feedback/Conflict Resolution Form, the Director and/or designate (or if the complaint concerns the Executive Director), the Human Resources Director, along with the Chair of the Board of Directors, will consider the allegations and take appropriate interim measures to ensure the cessation and prevention of any alleged prohibited behaviour while the alleged conduct is investigated. This may include reassigning a staff, student or volunteer to a different location or shift, or placing an alleged perpetrator on paid leave of absence during the investigation of the incident, where appropriate.

The Investigator shall:

- Review the allegations;
- Conduct separate interviews with the alleged victim of the incident, the worker who reported the harassment, any witnesses to the prohibited behaviour, and any person with relevant information to the extent reasonably possible;
- Interview the alleged harasser, where reasonably possible, and provide them the information required to respond to the allegations, and in certain circumstances, give the complainant an opportunity to reply;
- Collect and review any relevant documents;
- Take appropriate notes and statements during interviews; and
- Prior to any interview that takes place with any worker who may be subject to discipline because of the incident or investigation, the investigator shall inform the worker of their right to bring another person/staff present with them for the interview, if applicable.

Investigation Report:

- The investigator shall prepare a report which summarizes:
 - The steps taken during the investigation;
 - The complaint;
 - The allegations of the worker claiming harassment;
 - The response from the alleged harasser;
 - The evidence of any witnesses;
 - The evidence gathered;
 - The investigator's findings of fact; and
 - The investigator's conclusions of whether prohibited behaviour has been found or not.
- The report will be provided to the Executive Director and/or designate (or next higher-ranking officer where the Executive Director is implicated) to take appropriate action.

Communication of Results:

- The Executive Director and/or designate (or next higher-ranking officer where the Executive Director is implicated), shall consider the report and take the following steps:
 - Determine what, if any, action is required, which may at the discretion of the Executive Director and/or designate (or next higher-ranking officer where the Executive Director is implicated) include the following:
 - If there are reasonable grounds to conclude that prohibited behaviour occurred, the appropriate disciplinary action, if any, to be taken, and a

- copy of the report (redacted to remove any portions not pertaining to the staff, student, or volunteer subject to discipline), will be placed in the affected staff, students, or volunteer's personnel file;
- If there are insufficient grounds to reach a conclusion, then further investigation will continue until resolution is possible;
 - If the Executive Director and/or designate (or next higher-ranking officer where the Executive Director is implicated) is satisfied that no prohibited behaviour has occurred, all documentation of the evidence shall be given to the Executive Director and/or designate (or next higher-ranking officer where the Executive Director is implicated), and no such documentation or allegations of prohibited behaviour will be placed in the staff, students, or volunteer's personnel file.
- Provide the complainant and the alleged perpetrator with a written statement of the results of the investigation and the corrective action (if any) within 10 days of the report being issued by the investigator. This written statement of results is not the same as the investigation report. These parties are entitled to know the corrective action imposed, however, it is understood that there is a balance between privacy and the right to know. The information provided needs to be general, and cannot disclose specific details, which would break confidentiality.

Corrective and Disciplinary Action

- Any staff, student, or volunteer who is found to have engaged in prohibited behaviour will (where appropriate) be subject to disciplinary action, up to and including discharge from employment.
- In determining the appropriate disciplinary action, the following will be considered:
 - Nature of the complaint.
 - Workplace situation.
 - Impact of the offence on the complainant.
 - Seriousness and frequency of behavior.
 - Respondent's position within the organization (i.e. was the respondent in a position that required particular responsibility to avoid any behaviour or conduct which is known, or should reasonably be known, to be unwelcome).
 - Previous conduct of respondent.
 - Willingness of respondent to co-operate or change behavior.
 - Trust relationship.
 - Admission of wrongdoing.
 - Failure to warn.
- The Executive Director or designate (or next higher-ranking officer where the Executive Director is implicated) and supervisors/managers (if applicable) will be responsible for the facilitation and monitoring of any disciplinary action.
- Disciplinary action will also be taken if a complaint is found to have been made fraudulently, and with malicious intent.
- Where a volunteer or contractor to the agency is involved, a decision regarding any action to be taken will be made on a case-by-case basis.

Supports for Affected Employees:

- In all cases where reasonable grounds exist to support an allegation of an act of prohibited behaviour, the Executive Director and/or designate (or next higher-ranking

officer where the Executive Director is implicated), must ensure that appropriate emotional and physical support is provided.

No Reprisal:

- No worker will be penalized for reporting an incident of prohibited behaviour or for participating in an investigation (unless any such report is made fraudulently and with malicious intent). Penalizing staff for exercising their rights under the OHSA is prohibited and any staff found to have engaged in any reprisal against a staff member will be subject to discipline.

Training and Education:

- The agency will provide training and education to all staff, students, and volunteers with respect to the contents of this policy.
- This training will include what conduct is considered to be workplace harassment, including workplace sexual harassment, and how to recognize it, along with how and to whom to report an incident of workplace harassment.
- Staff, students, and volunteers will be advised of agency procedures for the investigation of bullying and harassment complaints, and how the investigation reports will be shared with the parties involved in the complaint.
- All agency staff will be required to review this policy at least annually.
- Additional training on these topics may also be offered, as determined by management.

Confidentiality and Record Keeping

- The agency will do everything it can to protect the privacy of people involved and to ensure that complaints and respondents are treated fairly and respectfully.
- Information obtained about an incident or complaint of workplace harassment, including identifying information about any people supported involved, will not be disclosed unless disclosure is necessary to protect the person, to investigate the complaint or incident, to take corrective action, or otherwise as required by law. The Executive Director and/or designate (or next higher-ranking officer where the Executive Director is implicated), will determine the extent to which the information regarding the complaint must be disseminated.
- People supported (including the complainant, the respondent, and any witnesses or others involved in the investigation process) are to ensure that they refrain from discussing the complaint, information related to the complaint, or information they have gained through the investigation process with anyone other than the investigation team.
- All documents related to a complaint including the written complaint, witness statements, investigation notes/reports, documents related to the complaint, a copy of the results of the investigation that are provided to the complainant(s) and the respondent(s), and a copy of the corrective action taken to address the prohibited behaviour, will be kept confidential and kept in a separate investigation file securely maintained by the Human Resource Department. These documents will not be disclosed unless necessary to investigate an incident or complaint, take corrective action, or as otherwise required by law.
- If there is an external investigation, information collected by the external investigator will be kept in accordance with their practices.
- Records related to an investigation of harassment, discrimination, or workplace violence complaint will be documented and kept in a secure file for a period of seven (7) years.

DEFINITIONS:

- **Discrimination:** The Human Rights Code Definition of discrimination, which includes:
 - **Direct Discrimination:** Imposing a requirement, qualification, exclusion, restriction, preference, or factor based on a prohibited ground of discrimination.
 - **Constructive or Adverse Effect Discrimination:** Imposing a requirement, qualification, exclusion, restriction, preference, or factor that although not expressly related to a prohibited ground of discrimination, results in the exclusion, restriction, or preference of a group of persons who are identified by a prohibited ground of discrimination, except where the restriction is a reasonable and bona fide occupational requirement.
- **Poisoned Work Environment:** A general climate of disrespect, offensive language, and belittling that, even if not directed at anyone in particular, makes the workplace unpleasant and difficult.
- **Prohibited Grounds:** Race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, record of offences, marital status/same sex partnership status, family status, disability, or any other analogous ground.
- **Threat:** The implication or expression of intent to inflict physical harm or actions that a reasonable person would interpret as a threat to physical safety.
- **Workplaces:** Anywhere the business of the agency is being carried out. This includes offices, support locations, homes, other community partners, and agencies. It also includes other locations and situations such as during business travel, work-related social gatherings, or other locations where work is being performed, and prohibited behaviours may have a subsequent impact on the work relationship, environment, or performance.
- **Workplace Violence:** The use or attempted use of physical force against staff, students, volunteers, or a person supported that causes or could cause physical injury. Workplace violence also includes a statement or behaviour that a staff member, volunteer, student, or people supported could reasonably interpret as a threat to use physical force against them that could cause physical injury. Physical force includes, but is not limited to, aggravated assault, assault, sexual assault, gestures, kicking, pushing, biting, and/or spitting.
- **Workplace Harassments:** A course of vexatious comments or conduct against staff, students, volunteers, or people supported in a workplace that is known or ought reasonably to be known to be unwelcome, whether or not based on a prohibited ground, including, but not limited to:
 - Hostile, obnoxious, or intimidating behaviour, or behaviour which ought reasonably to have been known to be hostile, obnoxious, or intimidating.
 - Emotional or psychological abuse.
 - Workplace sexual harassment (as defined below).
 - Targeting a person or group of people because of personal dislike or personality conflict because of, but not limited to, a prohibited ground of discrimination under the Code, including race, ancestry, place of origin, colour, ethnic origin, citizenship, creed (religion), sex, sexual orientation, disability, age, marital (same sex partner) status, family status, gender identity, or record of offence.
 - This policy is concerned with the impact of behaviour, not the intent of the person responsible for the prohibited behaviour. Single acts of sufficient severity may constitute harassment.
 - Examples of Workplace Harassment include but are not limited to:
 - Jokes, gestures, demands, or comments about a person's body, clothes, habits, customs, or mannerisms.

- Jokes intended to intimidate others or that are offensive in nature, even if meant in an “ironic” or facetious sense.
 - Inappropriate staring at others.
 - Isolating another person because of their gender and/or sexual identity.
 - Displaying pictures, graphics or symbols, including things on or printed from a computer, can also be harassing.
 - Making fun of someone because they wear a traditional dress (such as a turban, sari or veil).
 - Using language that offends when it refers to a person’s race, colour, sex, sexual orientation, disability, etc.
 - Displaying or distributing pictures, jokes, or cartoons that are demeaning (i.e. pin-ups, racist cartoons, etc.).
 - Sending inappropriate or embarrassing emails or making inappropriate posts on social media.
 - Inappropriate or unwanted touching.
 - Lies or gossiping about an individual’s personal life.
 - Passive aggressive behaviours such as giving the silent treatment or other subtle, non-verbal forms of bullying.
 - Setting someone up to be unsuccessful (i.e. providing wrong instructions on purpose, excluding someone from a meeting).
 - Scapegoating.
 - Practical jokes that cause awkwardness or embarrassment.
 - Excessive profanity (swearing), vulgarity, ridicule, belittling, or derogatory name-calling towards a person.
- **Conduct that Does Not Constitute Workplace Harassment:** It is important to note that legitimate and constructive criticism provided by a staff’s supervisor or any agency management staff to staff, students, or volunteers on their performance or behaviour at work, performance management, and progressive discipline is not harassment, nor is an occasional raised voice or argument. However, workplace harassment will not be condoned under the guise of strong management when staff, students, or volunteers are not treated with dignity and respect.
- **Workplace Sexual Harassment:** Engaging in a course of vexatious comments or conduct against any staff in a workplace 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 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 staff, volunteer, or student, and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.
- Examples of Workplace Sexual Harassment include, but are not limited to:
 - Sexual remarks.
 - Unnecessary physical touching.
 - Jokes or insulting gestures.
 - Sexual requests or suggestions.
 - Leering, suggestive staring, or comments.
 - Displaying or distributing sexually offensive material (including by electronic means).
- **Prohibited Behaviour:** The following behaviour and/or conduct is prohibited under this policy and will lead to discipline up to and including discharge from employment:
- Workplace violence.
 - Workplace harassment.

- Workplace discrimination.
- Threats or intimidation.
- Possession of weapons of any kind while engaged in activities for the agency.
- Physical violence.
- Dangerous or threatening horseplay.
- Blatant or intentional disregard for the safety or well-being of others.
- Retaliation against anyone who has made a complaint or who has participated in an investigation under this policy.
- Failing to report an incident of workplace discrimination, violence, or harassment of which staff, students, and volunteers are aware.
- Any other act that is considered a violation of this policy, whether or not specifically set out above.

Policy Review, Program Evaluation and Questions

- This policy and the procedures thereunder will be reviewed as often as necessary, but at a minimum of once a year.
- The workplace violence awareness and prevention program will be reviewed annually by the management team.
- If you have any feedback or questions about this policy and the procedures thereunder, please speak to Human Resources.

REFERENCES:

- Ontario Human Rights Code, R.S.O. 1990, c.H.19
- Occupational Health and Safety Act, R.S.O. 1990, C.O.1
- Supports and Services to Promote the Social Inclusion of Persons with Developmental Disability Act, 2008, SO 2008, c. 14 (the “Social Inclusion Act”)
- Quality Assurance Measures, O Reg 299/10

CROSS REFERENCES:

- Rules of Conduct Policy
- Working Alone Policy
- Conflict Resolution Process Policy
- Abuse Prevention, Identification and Reporting

Annual review

Date Implemented	August 30, 2011			
Date	Jul. 25, 2019	Jul. 27, 2020	Jul. 15, 2021	
Reviewed or Revised	Revised	Revised	Reviewed	