



# ISLAND COASTAL AVIATION

## Discrimination, Harassment and Violence prevention policy

### **Content:**

- List of abbreviations (Page 1)
- Mission Statement (Page 2)
- Policy Statement (Page 2-3)
- Policy Application (Page 3)
- Definition of Discrimination (Page 3)
- Definition of Harassment and Violence (Page 4-6)
- Role of Island Coastal Aviation (Page 6-7)
- Role of ICA Health & Safety Representative (Page 7-8)
- Role of Employee (Page 8)
- Factors that can contribute to workplace Harassment and Violence (Page 9)
- Harassment and violence prevention training (Page 10)
- Outline of the resolution process (Page 10-13)
- Protection against reprisals (Page 13)
- Workplace assessment ((Page 13)
- Emergency procedures (Page 14-15)
- Privacy Protection (Page 16)
- Recourse avenues (Page 16)
- Support measures (Page 16)
- Notices submitted in bad faith (Page 16)
- Complaints related to employer non-compliance with the code or Regulations (Page 16)
- Definitions (Page 17)

### **List of Abbreviations:**

ICA – Island Coastal Aviation

DHVP – Discrimination, Harassment and Violence Prevention

CHRA – Canadian Human Rights Act

EEA - Employment Equity Act



## **Mission Statement:**

Island Coastal Aviation (referred to hereafter as: ICA) is committed to a healthy, discrimination, harassment-free and violence-free environment for all our employees.

ICA has developed a company-wide policy intended to:

- prevent and respond to workplace discrimination, harassment, and violence of any type, and effectively address any incident that might occur.

## **Policy Statement:**

This policy is intended to make the work environment at ICA inclusive, safe, and non-discriminatory for everyone by setting out expectations and standards of conduct, and by ensuring we have a clear process in place for responding to complaints of discrimination, workplace harassment and violence.

All forms of discrimination, harassment and violence will not be tolerated, condoned, or ignored.

All workers (defined below under Scope or application) are required to treat others with dignity, courtesy, and respect. Those found to be in violation of this policy may be subject to disciplinary action, even termination. To be in violation of this policy includes any worker who: interferes with the resolution of a complaint; retaliates against an individual for filing a complaint; or knowingly files an unfounded complaint intended to cause harm.

The rights of all workers at our organization are protected by the CHRA and the Employment Equity Act (EEA). In all areas of employment and the provision of goods and services, ICA commits to acting in accordance and compliance with the CHRA, the EEA, the Canada Labour Code and the Workplace Harassment and Violence Prevention Regulations to ensure that individuals and groups are not disadvantaged or treated unfairly within our organization.

ICA is dedicated to creating a workplace culture that promotes equality, diversity, transparency, and respect for human rights. These values guide our proactive approach to preventing workplace harassment and violence, which includes:

- providing regular harassment and violence training to all workers.
- conducting confidential surveys among our workers on their perspective of equality, harassment and violence, and our workplace culture.
- assessing the risk of harassment and violence occurring in the workplace.
- implementing preventative measures to eliminate or reduce these risks; and
- developing additional policies and procedures as needed.

This policy also sets out a clear procedure for how workers can report harassment and violence and how managers and supervisors can deal with harassment and violence complaints fairly and promptly. Any worker who experiences or witnesses' discrimination, harassment or violence is encouraged to come forward and report the occurrence.

This policy applies to all employees and contractors at Island Coastal Aviation who are engaged in work, work-related activities, or work-related relationships. It applies to employees and



contractors both on company property and outside of company property. This policy applies to all incidents of workplace harassment and violence, including sexual harassment and sexual violence, family violence and third-party violence.

## **Policy application:**

This policy applies to:

- All individuals at ICA who are engaged in work, work-related activities or work-related relationships between themselves and ICA. This includes full-time employees, part-time employees, students, casual assignments, contractors or consultants, permanent and temporary workers, board members, job applicants, suppliers, volunteers, and those on approved leave, hereafter referred to as “workers.”
- All behaviour that is connected to work in some way and applies to workers both on ICA and outside of ICA property. This includes conduct during off-site meetings, work-related functions, training, and business trips.
- All aspects of employment including recruitment, selection, conditions, benefits, training, promotion, task allocation, shifts, hours, leave arrangements, workload, equipment, and transport.
- All aspects of the provision of goods and services, including how workers provide services to clients and how the workers interact with members of the public.
- All incidents of discrimination, workplace harassment and violence, including sexual harassment and sexual violence, family violence and third-party violence.

## **Definition of Discrimination**

**Discrimination** is when someone treats another person or group unfairly based on personal traits like race, sex, or disability. These are called prohibited grounds of discrimination, and they are listed in the CHRA.

Discrimination can be any action, behaviour or decision that results in the unfair or negative treatment of a person or group related to one, or any combination, of the prohibited grounds outlined in the CHRA.

Discrimination can be out in the open (direct). This discrimination is often based on negative attitudes and biases. A racist slur yelled at a co-worker is direct discrimination. So is an employer’s policy not to hire individuals with specific personal traits that is not validly related to the job. A bank that refuses to hire women as managers is an example.

Discrimination can also be hidden (indirect). This is the most common kind of discrimination. Indirect discrimination happens when a rule or policy that does not cause a problem for most people has an unfair effect on a person or group that is related to their personal traits. An example of indirect discrimination is a rule that all workers must work Saturdays. A worker whose religion does not allow them to work on Saturday and is fired for not working that day is unfairly affected by this rule. This kind of discrimination is harder to pin down and can sometimes be explained away.

Discrimination may be intentional or unintentional.

Even if there are many factors affecting an action, conduct or decision, if discrimination is one factor, it is a violation of this policy.

## **Definition of harassment and violence:**

The *Canada Labour Code* (the Code) defines harassment and violence at subsection 122(1) as “any action, conduct or comment, including of a sexual nature that can reasonably be expected to cause offence, humiliation or other physical or psychological injury or illness to an employee, including any prescribed action, conduct or comment.”

### **Harassment can include, but is not limited to any of the following acts or attempted acts**

- spreading rumours or gossip about an individual or group
- cyber bullying (threatening, spreading rumours, or talking negatively about an individual online)
- threats made in person or over the phone, by email, or through other medium to an employee, including from an (ex)partner or family member.
- making offensive jokes or remarks
- playing unwanted practical jokes
- socially excluding or isolating someone
- stalking or inappropriately following a person
- tampering with someone’s work equipment or personal belongings.
- vandalizing or hiding personal belongings or work equipment.
- impeding a person’s work in any deliberate way
- persistently criticizing, undermining, belittling, demeaning, or ridiculing a person
- intruding on a person’s privacy
- public ridicule or discipline
- unwelcomed physical contact.
- sexual innuendo or insinuation
- unwanted and inappropriate invitations or requests, including of a sexual nature.
- displaying offensive posters, cartoons, images, or other visuals
- making aggressive, threatening, or rude gestures
- misusing authority, including:
  - constantly changing work guidelines
  - restricting information
  - setting impossible deadlines that lead to failure, and/or
  - blocking applications for leave, training or promoting in an arbitrary manner
- **engaging in any of the actions, conduct and comments outlined above against a person because of that person’s:**
  - race
  - national or ethnic origin
  - colour
  - religion
  - age
  - sex
  - sexual orientation
  - gender identity or expression
  - marital status
  - family status
  - genetic characteristics
  - disability, or
  - any of the other prohibited grounds that the *Canadian Human Rights Act* lists

- **Microaggressions** are brief, indirect, and everyday slights, indignities, put-downs, and insults that communicate discriminatory attitudes towards members of equity-deserving groups. These can be behavioural, verbal, or environmental, and can be intentional or unintentional. Microaggressions can leave those subjected to them feeling uncomfortable, unwelcome, insulted, othered, and painfully reminded of stereotypes associated to their identities. Examples of racist microaggressions include, among many others, insistently asking a racialized person where they are really from, complimenting a racialized person on the quality of their English, or clutching one's bag tighter in the presence of a Black man. Sexist and/or gendered microaggressions can reinforce traditional gender roles in the workplace, including masculine privilege and dominance. These may come in the form of comments on a woman's appearance, demeaning comments about a woman's abilities, and assumptions of inferiority of women in certain fields. These are all examples that communicate hostile, derogatory, or negative attitudes towards women. While there may be no harm consciously intended, microaggressions nevertheless cause harm, and the harmful impact is cumulative as those affected experience these microaggressions frequently in their day-to-day lives.
- **Important:** This policy is grounded in an understanding that if the person being harassed does not explicitly object to the behaviour, or appears to be going along with it, this does **not** mean that the behaviour is okay. The behaviour could still be considered harassment.

### **Harassment is not:**

Harassment is not any of the following:

- consensual workplace banter and interactions (unless it includes hurtful remarks about others, especially if they pertain to any of the prohibited grounds listed above)
- reasonable management action carried out in a fair way, such as day-to-day actions by a supervisor or manager related to:
  - performance
  - absenteeism
  - assignments
  - discipline, and
  - even dismissal (unless it is abusive or discriminatory)
- every workplace disagreement, if a conflict is poorly handled or left unresolved, it can lead to harassment.

### **Sexual harassment**

Sexual harassment is broadly defined as unwelcome conduct of a sexual nature that is likely to cause offence or humiliation to a worker. It is a demeaning practice that violates the dignity and self-respect of the victim, both as a worker and as a human being.

Sexual harassment can take many forms and may target any gender, including men, women, trans, non-binary, and gender diverse individuals.

Examples of sexual harassment can include but are not limited to:

- unnecessary or unwanted physical contact
- persistent questions, insinuations or spreading gossip about a person's private life such as their sexuality, gender identity or expression or sex life.

- insults or demeaning comments about one's gender or gender role.
- staring at a person or parts of their body
- treating an individual differently because they do not conform to the gender role which one expects, such as a role that has been traditionally occupied by another gender.
- repeated invitations to go out after prior refusal.
- sexually explicit comments or gender-based jokes
- displaying or circulating offensive graphics, drawings, e-mails, text messages, letters, or comments
- making promises or threats in return for sexual favours
- the creation or perpetuation of a poisoned environment, where workers must tolerate or endure generalized sexual or gender-related ridicule as part of a workplace culture, and/or
- any other behaviour that could be thought to put sexual conditions on a person's job or employment opportunities.

## **Violence**

Violence can include but is not limited to the following acts or attempted acts:

- verbal threats or intimidation
- verbal abuse, including swearing or shouting offensively at a person.
- contact of a sexual nature
- 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.

## **The Role of ICA**

The role of ICA in relation to discrimination, harassment and violence prevention includes:

- committing to preventing discrimination, harassment, and violence in the workplace
- jointly reviewing and, when necessary, updating this policy with the policy committee at least once every 3 years or following any change to an element of this policy
- jointly conducting an initial workplace assessment with the policy representative/committee
- jointly monitoring and, when necessary, updating the workplace assessment with the policy committee when there is:
  - a change to the risk factors identified, or
  - a change in the effectiveness of the preventive measures that have been developed and implemented.
- jointly reviewing and updating the workplace assessment with the workplace committee:
  - in situations where the principal party chooses to end the resolution process, but the occurrence is not resolved, or
  - in situations where the responding party is not an employee or the employer
- jointly reviewing the workplace assessment with the policy committee and, when necessary, updating it

- jointly developing emergency procedures with the policy committee
- deploying the workplace emergency procedures whenever an incident, including an incident of family violence or domestic violence, poses an immediate danger to the health and safety of an employee or there is a threat of such an incident.
- jointly reviewing and, when necessary, updating the emergency procedures with the policy committee
- making available to all employee's information related to support services.
- jointly developing or identifying harassment and violence prevention training with the policy committee
- delivering harassment and violence training to all employees and the designated recipient
- jointly reviewing and, when necessary, updating the training with the policy committee at least once every 3 years and following any change to an element of the training
- ensuring that the designated recipient correctly follows the resolution process that is outlined in the *Workplace Harassment and Violence Prevention Regulations* (the Regulations)
- for investigations into an occurrence of harassment and violence, providing a copy of the investigator's report to the principal party, responding party, and workplace committee.
- jointly determining with the workplace committee which recommendations from the investigator's report should be implemented.
- implementing the jointly determined recommendations from the investigator's report
- ensuring the resolution process is completed within 1 year after the day on which a notice of an occurrence is received.
- reporting to the Labour Program employee deaths resulting from occurrences of harassment and violence, within 24 hours of becoming aware of the death
- providing the Labour Program by March 1st of every year an annual report summarizing the data on all occurrences of harassment and violence in the previous calendar year
- complying with all other aspects of the Regulations and the Code as it relates to harassment and violence.

## **Role of Health and Safety representative:**

Under this policy the role of the designated health and safety representative in relation to Discrimination, harassment and violence prevention at ICA includes:

- responding to all notices of an occurrence within 7 days of receiving the notice
- initiating negotiated resolution with the principal party within 45 days after the day on which the notice of an occurrence is received.
- reviewing every notice of an occurrence with the principal party against the definition of harassment and violence outlined in subsection 122(1) of the Code.
- making every reasonable effort to resolve an occurrence for which a notice has been provided.
- allowing the principal and responding parties the option of participating in conciliation if they both agree to participate and on who will facilitate the conciliation.
- providing notice of an investigation to the principal and responding parties if the principal party requests an investigation.
- in the case of an investigation, selecting a person to act as an investigator in coordination with ICA management

- ensuring selected investigators have the necessary knowledge, training and experience required by the Regulations.
- ensuring investigators provide a written statement indicating they are not in a conflict of interest with respect to the occurrence.
- providing investigators all the information that is relevant to their investigation.
- providing monthly status updates to the principal and responding parties on the status of the resolution process

### **The role of the Health and Safety Representative in relation to harassment and violence prevention at ICA includes:**

- jointly reviewing and, when necessary, updating this policy with ICA Management at least once every 3 years or following any change to an element of this policy
- jointly conducting the workplace assessment with ICA Management and making recommendations to ICA Management regarding changes that should be made.
- jointly monitoring and, when necessary, updating the workplace assessment with ICA Management when there is:
  - a change to the risk factors identified, or
  - a change to the effectiveness of the preventive measures that have been developed and implemented.
- jointly reviewing and, when necessary, updating with ICA Management the workplace assessment every 3 years
- jointly developing the emergency procedures with ICA Management
- jointly reviewing and, when necessary, updating the emergency procedures with ICA Management
- jointly identifying with ICA Management appropriate harassment and violence training
- jointly reviewing and, when necessary, updating the training with ICA Management at least once every 3 years and following any change to an element of the training
- jointly developing a list of investigators with ICA Management, whenever appropriate, ensuring continuous compliance with the Regulations and the Code

## **Role of Employees**

The role of all employees in relation to discrimination, harassment and violence prevention at ICA include:

- refraining from discrimination and committing harassment and violence
- where appropriate and safe, informing a person discriminating or committing harassment and violence that their actions are inappropriate and unwelcomed.
- reporting all occurrences of discrimination, harassment and violence to their supervisor or the Health & Safety representative when they experience or witness it.
- where appropriate, making every reasonable effort to resolve an occurrence of discrimination, harassment and violence through negotiated resolution if they were a party to an occurrence.
- cooperating with an investigator and the investigation process related to an occurrence.
- refraining from retaliatory behaviour against the principal party, responding party, witnesses and any other individuals who are involved in the resolution process for an occurrence.



- respecting the confidentiality of the information shared throughout the resolution process of an occurrence.

## **Factors that can contribute to workplace harassment and violence.**

### **Client characteristics**

Working with Students and Passengers that exhibit certain characteristics can put employees at greater risk of harassment and violence. This can include working with clients, and their relatives, who may lash out at the closest person due to

- being angry and frustrated
- having a history of violence
- a mental health condition, emotional disorder, or a head injury
- Cultural biases, racist, sexist, homophobic, transphobic, ableist or otherwise discriminatory attitudes and behaviors

### **Physical work environment**

Certain work environments and workplace designs can result in additional risks that may lead to harassment and violence. These can include:

- working alone, in small numbers or in isolated or low-traffic areas
- working in an environment with high noise levels

### **Work activity/culture.**

- working with the public
- working during periods of intense organizational change
- Working with diverse Student body

### **Job factors**

Aspects specific to a job, such as mental and physical demands of the job, can result in additional hazards that may lead to harassment and violence. This can include:

- lack of control over how work is done.
- excessive workload
- unreasonable or tight deadlines leading to high stress.
- confusing, conflicting, or unclear job or roles
- ambiguous or complicated reporting structures
- lack of job security

### **Other external factors**

Other external factors that can result in harassment and violence include:

- Family violence or domestic violence, such as a family member or (ex) partner:
  - threatening an employee or co-workers either verbally or over the phone or email
  - stalking the employee

- verbally abusing the employee or co-workers
- destroying the employee or organization's property
- physically harming the employee or co-workers
- using work time or workplace resources to monitor or attempt to control the actions of an (ex) partner

## **Harassment and violence prevention training**

ICA will provide all its employees with a 1-day harassment and violence training course. This course will cover:

- elements of the workplace harassment and violence prevention policy
- the relationship between workplace harassment and violence and the prohibited grounds of discrimination under the *Canadian Human Rights Act*
- how to recognize, minimize and prevent workplace harassment and violence

All new employees will receive training within 3 months after the day on which their employment begins. Further, all employees will receive this training again at least once every 3 years.

The following groups will receive training on their obligations in relation to harassment and violence at least once every 3 years:

- supervisors
- managers
- directors, and
- Health & Safety representative

## **Outline of the resolution process**

Below is a summary of the resolution process. It includes how someone, or a witness, can submit a notice of an occurrence.

### **Notice of an occurrence**

You are encouraged to notify the Health & Safety representative if:

- you are an employee who is experiencing or have experienced harassment and violence in the workplace, or
- you are an individual (employees or non-employees) who witnessed an occurrence of harassment and violence in the workplace.

**Notify the Health & Safety representative by telephone at (604)465-5560, or by email at: [S\\_H@islandcoastalaviation.com](mailto:S_H@islandcoastalaviation.com)**

The Health & Safety representative will ask the employee or individual to fill out a form, in which they provide the following information:

- 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 Health & Safety representative verbally. The Health & Safety representative will then transcribe the information for them on the form.

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.

ICA cannot reveal the identities of the parties involved in the resolution process for an occurrence to either the policy committee or workplace committee without the consent of the parties. However, the identities of the parties may be revealed to each other as part of the resolution process.

### **Negotiated resolution.**

Negotiated resolution is a form of informal resolution where the principal party meets with the employer or designated recipient to:

- discuss the occurrence.
- clarify what was submitted in the notice of occurrence, and
- attempt to reach resolution.

During negotiated resolution, the Health & Safety representative will ask the principal party to meet, either in person or by phone. This meeting is for an initial discussion regarding the occurrence. During this discussion, the Health & Safety representative and the principal party will review the notice of occurrence that they received against the definition of harassment and violence in the Code. Together, they will try to determine whether the occurrence meets the definition. If both the member of the Health & Safety representative and the principal party agree that the occurrence does not meet the definition, then they will deem the occurrence as resolved.

If the member of the Health & Safety representative and the principal party do not agree as to whether the occurrence meets the definition, and the principal party wishes to continue with the resolution process, then the principal party has the option of either:

- continuing with negotiated resolution, or
- pursuing conciliation and/or an investigation

If the principal party wishes to continue with negotiated resolution, they must inform the Health & Safety representative of this decision. The Health & Safety representative will schedule a series of meetings with the principal party. At the meetings, where applicable, the responding party will discuss the occurrence and attempt to achieve resolution. The responding party does not have to be informed of the principal party's notice of occurrence or be involved at this stage of the resolution process. This is only if the principal party does not wish for them to be notified or involved. The Health & Safety representative can arrange for any of the following meetings:

- meetings with only the principal party and the Health & Safety representative, ICA management will be included upon request by the principal party or the Health & Safety representative.
- meetings with the principal party, responding party and the Health & Safety representative, ICA management will be included upon request from the principal part or corresponding party or the Health & Safety representative.

- meetings between the principal party and the Health & Safety representative with concurrent but separate meetings between the responding party, ICA management will be included upon request by the principal party or responding party or the Health & Safety representative.

### **Conciliation**

A principal party and responding party may engage in conciliation at any time during the resolution process. However, conciliation can only proceed if both the principal party and the responding party agree to engage in conciliation. They must also agree on the person who will facilitate the conciliation. However, conciliation can only proceed if an investigator has not provided their final investigation report.

The principal party and responding party are required to inform the Health & Safety representative of their desire to participate in conciliation. The Health Safety representative will then facilitate discussion around the selection of a conciliator who is agreeable to both parties. The Health & Safety representative will also schedule time for both parties to meet with the conciliator.

### **Investigation**

The principal party may request an investigation at any time during the resolution process. If the principal party wishes to proceed with an investigation, the Health & Safety representative will then:

- Inform ICA management
- provide notice of an investigation to the principal and responding party, and
- select an investigator jointly with ICA management

The selected investigator will investigate the occurrence and provide ICA a report outlining:

- a general description of the occurrence
- their conclusion, and
- their recommendation to eliminate or minimize the risk of a similar occurrence.

ICA will then provide a copy of this report to the principal party, responding party.

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.

ICA management will then meet to determine which of the recommendations in the investigator's report are to be implemented. ICA will implement those recommendations within 1 year of receiving the notice of occurrence.

ICA may take into consideration the findings in an investigator's report when applying disciplinary measures. However, disciplinary measures will also depend on the findings from a separate administrative investigation that the ICA will conduct in some circumstances.

ICA cannot use the findings in an investigator's report for any of the following purposes:

- replenishment of sick leave
- granting of any additional paid or unpaid leave
- monetary remuneration for damages



## **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

## **Protection against reprisal**

Parties involved in an occurrence are prohibited from seeking retaliation. If you experience any retaliatory action or threat of retaliatory action from the responding party, witnesses, management, or other people within or outside the organization, please inform the Health & Safety representative immediately.

## **Workplace assessment**

The Health & Safety representative will conduct a joint review with ICA management. If necessary, they will update the workplace assessment if an employee submits a notice of an occurrence, and the resolution process cannot proceed for any of the following reasons:

- the principal party chooses to end the resolution process at any point during the resolution process, but the occurrence is not resolved.
- the responding party is not an employee or the employer (for example, the responding party is a member of the public, a client, or an (ex)partner or family member)

The purpose of the review and update of the workplace assessment is to:

- determine what happened, considering the circumstances of the occurrence.
- determine whether all risk factors have been appropriately identified.
- develop new preventive measures, if needed, to mitigate the risk of a similar occurrence

## **Emergency procedures**

If a harassment and violence occurrence pose an immediate danger to the health and safety of an employee, or if there is a threat of such an occurrence, please call 911 for emergency services (police, fire, and ambulance) after calling emergency services contact the contact operation manager at (250) 508-2108.

Below is a summary of the emergency procedures that must be followed in several types of situations.

## **Violence in the workplace**

If you witness or experience violence at work:

- remove yourself from the situation if you can.
- inform your manager or seek help from a co-worker immediately.
- if your manager is the perpetrator, notify another manager in the line of authority.
- if your physical security or well-being is threatened, press your panic button and if possible, call 911.
- contact the Security Office as soon as you can do so.

### **If you are dealing with a violent person:**

- stay calm.
- try to calm the other person or diffuse the situation (if you can)
- avoid saying or doing anything that could aggravate the situation.
- avoid eye contact or sudden movements that can be perceived as threatening.
- respect the person's personal space.
- continue the conversation with the person only if the person calms down.
- tell the person that you understand the reason for their anger.
- if the behavior persists, end the conversation.
- politely notify the person that you will leave the work area or ask them to do so.
- notify your manager or seek help from a co-worker immediately (use the panic button if necessary)
- if the person refuses to leave the premises and the situation escalates call 911 and contact the Security Office

### **Active shooter:**

If you witness an incident involving an active shooter outside the building:

- stay out of sight (away from windows) and warn colleagues, clients, and visitors.
- leave the area at risk.
- when safe to do so, call 911, the ICA Management and other building occupants.
- if you cannot evacuate the building safely, lock outside doors and close the blinds and curtains.
- wait for instructions from first responders.

### **If you witness an incident involving an active shooter inside the building:**

- stay calm.
- if you can do so safely, leave the area immediately.
- warn others, as many as possible, without attracting the attention of the assailant
- if you can do so safely, call 911 and notify the Security Office and other building occupants.
- lock the doors or barricade yourself in a room using furniture.
- block the windows, close the office blinds and curtains.

- if the workspace has no door, hide under your desk or where you cannot be seen.
- if you are in a washroom, remain there, if safe to do so.
- silence your cellphone, turn off radios and computers.
- if you cannot escape, remain silent and hide until first responders arrive.
- wait for instructions from first responders.

### **Bomb threat:**

#### **If you are made aware of a bomb threat by telephone:**

- listen to the caller calmly and do not interrupt them
- try to get as much information as possible, such as:
  - when the bomb is supposed to explode
  - where the bomb is located
  - description of the device
  - reason for the call or motivation for the threat
  - telephone number on the display screen (if possible)
  - **remember any details you can about the caller, such as:**
  - approximate age
  - gender
  - accent
  - level of nervousness
  - any background noises.
- call 911 and inform your management.
- remain available to provide information to first responders.

#### **If you are made aware of a bomb threat by e-mail:**

- save the email (or letter)
- send it immediately to the Security Office

#### **If a bomb alert is activated (for example, over intercom):**

- visually inspect your immediate work area including:
  - wastepaper baskets
  - storage areas
  - dislodged suspended ceiling panels.
  - furniture that has been moved
  - closets
- inform your manager of the results of your search.
- if you find a suspicious package, do not touch it, and inform the Security Office immediately.
- do not evacuate the building until the security services authorize you to do so

## **Privacy protection**

ICA is committed to the protection of the privacy of the persons involved in an occurrence. As such, the policy committee and the workplace committee are not permitted any involvement in the resolution process of an occurrence. Only trained staff in the Health & Safety representative will engage in the resolution process with the principal party and responding party. Further, we will not permit an investigator to disclose in any report it produces and distributes the identity of any of the persons involved in an occurrence or the resolution process for an occurrence. This includes the principal party, responding party, witnesses and any other individuals interviewed by the investigator.

## **Recourse avenues:**

Employees can pursue multiple recourse avenues for their occurrence. This includes:

- pursuing recourse under the *Canadian Human Rights Act* with the Canadian Human Rights Commission, or
- pursuing recourse under the *Criminal Code*

## **Support measures:**

Employees can google searching a list of medical, psychological, or other support services available within a 30km radius. Supports and resources related to family violence are available at [Ending Violence Canada - Support Services](#).

## **Notices submitted in bad faith:**

Notices of harassment and violence that are identified throughout the resolution process as having been made in bad faith may be subject to disciplinary action.

## **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 your supervisor or to management.

## **Definitions:**

The following definitions apply to this policy:



- **Designated representative** means the person or department that has been designated by ICA, to whom a notice of an occurrence may be submitted. For the purposes of this Policy, the Health & Safety representative will act as the designated representative.
- **Occurrence** An alleged incident of harassment, sexual harassment, or violence in the workplace.
- **Principal party:** The worker or employer who believes they are the object of workplace violence, harassment, or sexual harassment (an occurrence).
- **Responding party:** The person (or people) who is alleged to have engaged in workplace violence, harassment or sexual harassment and is named in a complaint.
- **Witness** means a person who witnessed an occurrence of harassment and violence or is informed of an occurrence by the principal party or responding party.
- **Workplace** means any place where an employee is engaged in work for the employee's employer as per 122(1) of the Code.

#### **Notice of discrimination, harassment, or Violence occurrence**

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