

## **NPF WORKPLACE HARASSMENT AND VIOLENCE PREVENTION POLICY**

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### **STATEMENT**

1. The Staff of the Non-Public Funds, Canadian Forces (SNPF), is committed to providing a safe, healthy and respectful workplace, free from harassment and violence. This Policy aims to prevent workplace harassment and violence from happening, respond to situations in which harassment or violence have occurred, and importantly, support victims of harassment and violence.
2. Occurrences of workplace harassment and violence will be resolved by means of identifying what measures can be put in place to prevent a recurrence of the workplace harassment and violence.
3. Should the Employer determine that disciplinary measures may be warranted, these will be addressed outside of this Policy. For those matters refer to the SNPF Discipline Policy.

### **APPLICATION**

4. This Policy applies to all Staff of the Non-Public Funds, Canadian Forces (SNPF), hereinafter referred to as "Employees".
5. In particular, this Policy applies to persons employed by the SNPF, either in the workplace or at any location or any event related to work, including:
  - a. while working remotely/from home;
  - b. while on travel status;
  - c. at a conference where the attendance is sponsored by the Employer;
  - d. at the Employer sponsored training activities/information sessions;
  - e. at Employer sponsored events, including social event; and
  - f. when using communication technologies when there is a connection to the workplace or employment conditions.
6. For any questions related to the application of this policy, contact the Centre for Conflict Resolution and Ethics (CCRE).

### **APPROVAL AUTHORITY**

7. This Policy is issued under the authority of the Chief Executive Officer (CEO), SNPF.

## ENQUIRIES

8. Enquiries relating to this Policy should be directed to the Associate Director, Conflict Management and Values and Ethics at [HarassmentandViolencePrevention@cfmws.com](mailto:HarassmentandViolencePrevention@cfmws.com).

## DEFINITIONS

9. **Act** means part II of the Canada Labour Code.
10. **Designated Recipient** means the work unit that has been designated by SNPF, to whom the notice of occurrence may be submitted. For the purposes of this Policy, the CCRE will act as the Designated Recipient.
11. **Employer** refers to the Staff of the Non-Public Funds, Canadian Forces (NPF) and includes any person who acts on behalf of the Employer such as Manager/supervisor, director, Division Heads and Chief Executive Officer.
12. **Investigator** is a person who:
- a. is trained in investigative techniques;
  - b. has knowledge, training and experience that are relevant to harassment and violence in the workplace; and
  - c. has knowledge of the Canada Labour Code Part II, the Canadian Human Rights Act and any other relevant legislation to harassment and violence in the workplace.
13. **Occurrence** means an occurrence of harassment and violence in the workplace.
14. **Principal Party** means an Employee or Employer who is the object of an occurrence.
15. **Responding Party** means the person who is alleged to have been responsible for the occurrence in the Notice of Occurrence.
16. **Witness** means a person who witnessed an occurrence or is informed of an occurrence by the Principal Party or Responding Party.
17. **Workplace** means any place where an Employee is engaged in work as an SNPF Employee.
18. **Workplace Policy Committee** includes the National Senior Level Employer Representatives (NSLER), Senior Level Employer Representatives (SLER), Local Occupational Health and Safety Committee or Representative (LOHS C/R), which includes Union participation.

## **POLICY OBJECTIVES**

19. The objective of this Policy is to:
- a. identify the workplace factors that lead to harassment and violence in the workplace;
  - b. identify and take the necessary preventative measures to minimize and eliminate the risk of harassment and violence from occurring;
  - c. provide a harassment and violence free workplace for all Employees and those entering the Employer's workplaces;
  - d. resolve harassment and violence occurrences quickly, with sensitivity, fairness, respect and dignity for all parties and with an emphasis on informal, early resolution, as appropriate; and
  - e. promote conflict management services and providing support services for Employees impacted by harassment and violence in the workplace.

## **HARASSMENT AND VIOLENCE**

20. **Harassment and Violence** means 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, comment or conduct. (the Code, Part II, subsection 122(1)).

21. Harassment can include, but is not limited to any of the following acts or attempted acts:
- a. spreading malicious rumours or gossip about an individual or group;
  - b. cyber bullying (threatening, spreading malicious rumours or talking negatively about an individual online);
  - c. threats made over the phone, by email, or through other mediums to an Employee, including from an (ex)partner or family member;
  - d. making offensive jokes or remarks;
  - e. playing unwanted practical jokes;
  - f. socially excluding or isolating someone;
  - g. stalking or inappropriately following a person;
  - h. tampering with someone's work equipment or personal belongings;
  - i. vandalizing or hiding personal belongings or work equipment;
  - j. impeding a person's work in any deliberate way;
  - k. persistently criticizing, undermining, belittling, demeaning or ridiculing a person; and
  - l. Intruding on a person's privacy;
  - m. public ridicule or discipline;
  - n. unwelcome physical contact;
  - o. sexual innuendo/insinuation;
  - p. unwanted and inappropriate invitations or requests, including of a sexual nature;
  - q. displaying offensive posters, cartoons, images or other visuals;

- r. making aggressive, or threatening gestures;
- s. misusing authority, including constantly changing work guidelines, restricting information, setting impossible deadlines that lead to failure, and/or blocking applications for leave, training or promotion in an arbitrary manner; and
- t. 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 are listed in the *Canadian Human Rights Act*.

## **Harassment is Not**

22. Harassment is not any of the following:
- a. consensual workplace banter and interactions (unless the banter includes hurtful remarks about others, especially if they pertain to any of the prohibited grounds listed above);
  - b. reasonable management action carried out in a fair way, like day-to-day actions by a supervisor or Manager related to performance, absenteeism, assignments, discipline and even dismissal – as long as it is not abusive or discriminatory; and
  - c. a workplace disagreement, although if a conflict is poorly handled or left unresolved it can lead to harassment.

## **Violence**

23. Violence can include but is not limited to the following acts or attempted acts:
- a. verbal threats or intimidation that causes psychological injury or illness;
  - b. verbal abuse, including excessive swearing or shouting offensively at a person that causes psychological injury or illness;
  - c. unwanted contact of a sexual nature;
  - d. kicking, punching, scratching, biting, squeezing, pinching, battering, hitting or wounding a person in any way;
  - e. attack with any type of weapon;
  - f. spitting at a person;
  - g. homicide; and
  - h. rape.

## **ROLES AND RESPONSIBILITIES**

### **Employer**

24. Under this Policy, the Employer's responsibilities include, but are not limited to:
- a. preventing occurrences of harassment and violence and promoting a harassment and violence free workplace;
  - b. ensuring that all Employees are aware of this Policy and their responsibilities outlined herein and that the Policy is readily available;
  - c. providing training, jointly developed or identified with the Workplace Policy Committee, specific to the culture, conditions and activities of the workplace as it relates to workplace harassment and violence;
  - d. carrying out a workplace assessment consisting of the identification of hazards and risks related to harassment and violence in the workplace, jointly with the Workplace Policy Committee;
  - e. implementing preventive measures to eliminate or minimize the risks related to workplace harassment and violence, jointly with the Workplace Policy Committee and continual monitoring of the effectiveness of those preventative measures;
  - f. responding to and resolving all workplace harassment and violence occurrences including addressing issues and behaviours which may not yet meet the threshold of violence and harassment;
  - g. supporting Employees affected by workplace harassment and violence;
  - h. designating a person or unit, as a Designated Recipient to whom notification of a harassment and violence occurrence may be given; and
  - i. maintaining records relating to harassment and violence prevention and resolution of occurrences and ensuring reporting requirements are fulfilled.

### **Employees**

25. Under this Policy, the Employees' responsibilities include, but are not limited to:
- a. treating everyone at the workplace with respect and adhere to the expected behaviours found in the NPF Values and Ethics Policy;
  - b. reporting occurrences of workplace harassment and violence, experienced or observed, to their Manager or the Designated Recipient;
  - c. reporting risk factors that may contribute to workplace harassment and violence to the Employer;
  - d. co-operating in the resolution of workplace harassment and violence occurrences; and
  - e. attending training as defined in this Policy.

## **Designated Recipient**

26. Under this Policy, the CCRE will act as the Designated Recipient. The role of the Designated Recipient in relation to harassment and violence prevention will include:

- a. responding to all notices of an occurrence within seven (7) days of receiving the notice;
- b. initiating negotiated resolution with the Principal Party within 45 days after the day on which the notice of an occurrence is received;
- c. conducting a review of every notice of an occurrence with the Principal Party against the definition of harassment and violence outlined subsection 122(1) of the Code;
- d. making every reasonable effort to resolve an occurrence of harassment and violence for which a notice of an occurrence is provided;
- e. allowing the principal and Responding Party the option of participating in conciliation if they both agree to participate in conciliation and agree on who is to facilitate the conciliation;
- f. providing notice of investigation to the principal and responding parties if an investigation is requested by the Principal Party;
- g. in the case of an investigation, selecting a person to act as an investigator from the list of investigators;
- h. ensuring that the investigator selected for an investigation possesses the necessary knowledge, training and experience required by the Regulations;
- i. ensuring that the investigator has provided a written statement indicating that they are not in a conflict of interest with respect of the occurrence;
- j. providing the investigator with all the information that is relevant to the investigation; and
- k. providing monthly status updates to the principal and Responding Party on the status of the resolution process.

## **Union Representatives**

27. Under this Policy, the Union representatives are here to:

- a. provide advice and support their respective members experiencing workplace harassment and violence; and
- b. assist and participate in the development of the workplace harassment and violence prevention Policy and the related training and education program.

## **Workplace Policy Committee**

28. Under this Policy, the Workplace Policy Committee in relation to harassment and violence prevention includes:

- a. reviewing and updating the workplace assessment 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 (e.g. clients, other government departments, contractors, (ex) partners) and referring the results of the review and update to the Manager where appropriate; and
- b. jointly determining with the Employer which of the investigator's recommendations from the investigator's report are appropriate to implement.

29. The joint responsibilities of the Workplace Policy Committee with the Employer include:

- a. updating this Policy as required;
- b. carrying out a workplace assessment to identify risk factors relating to workplace harassment and violence;
- c. assisting in the development of a qualified list of investigators;
- d. reviewing and updating the workplace assessment every three (3) years, or earlier if required;
- e. developing or identifying training on workplace harassment and violence and reviewing it at least once every three (3) years; and
- f. reviewing all summary reports of an investigation made under this Policy and, with the Employer, determining which recommendations are to be implemented.

## **WORKPLACE HARASSMENT AND VIOLENCE RISK FACTORS**

30. Identifying and assessing the factors that may contribute to workplace harassment and violence and developing and implementing preventive measures are important steps to preventing workplace harassment and violence from occurring. The risk factors may vary based on the nature of the workplace and the type and conditions of work.

31. The Employer and the Workplace Policy Committee have jointly carried out a workplace assessment that consisted of the identifying risk factors, developing and implementing preventive measures.

32. In conducting this joint workplace assessment, the Employer and the Workplace Policy Committee considered the following:

- a. work conditions, including type and hours of work, location, physical environment;
- b. workplace culture;
- c. workplace activities;
- d. organizational structure;
- e. organizational culture; and
- f. personal situations.

33. Refer to Annex A – Factors that Contribute to Workplace Harassment and Violence that may contribute to workplace harassment and violence as well [Domestic Violence](#).

## **TRAINING**

34. As per the Regulations, an Employer and the Workplace Policy Committee must jointly develop or identify the training on workplace harassment and violence that is to be provided to:

- a. Employees;
- b. the Employer; and
- c. the Designated Recipient.

35. The Employer will provide all of its Employees with training on harassment and violence prevention. This course will cover:

- a. elements of the workplace harassment and violence prevention Policy;
- b. a description of the relationship between workplace harassment and violence and the prohibited grounds of discrimination under the *Canadian Human Rights Act*; and,
- c. how to recognize, minimize and prevention workplace harassment and violence.

36. All new Employees will receive training within three (3) months after the day on which employment begins. Further, all Employees will receive this training again once every three (3) years.

37. A list of mandatory and optional training is available as Annex B – Training.

## **PROCEDURES**

### **Employer Notification**

38. Employees subjected to harassment or violence or who witness someone being subjected to harassment or violence are encouraged to notify their Manager or the Designated Recipient, as soon as possible. The Employee may notify their Manager or the Designated Recipient of a harassment or violence occurrence verbally or in writing. The Manager will forward the Notice and all necessary information to the Designated Recipient.

39. A notice of occurrence is to contain:

- a. the name of the Principal Party and the Responding Party, if known;
- b. the date / time of the occurrence; and
- c. a detailed description of the occurrence.

40. Under the Regulations, section 15 (2), a notice of an occurrence must not be provided if (1) the Responding Party is not the Employer or an Employee, (2) exposure to harassment or violence is a normal condition of work for the Principal Party and (3) the Employer has measures in place to address that workplace harassment and violence. All three (3) conditions must be met. If in doubt, the receiving Manager should consult with the Designated Recipient.

### **Anonymous Notification**

41. Employees and witnesses may choose to provide an anonymous notification of workplace harassment and violence occurrence. If an anonymous notification is submitted, and the Principal Party name does not want to participate, the resolution process as outlined in this section will not proceed. Instead, the Designated Recipient and the Workplace Policy Committee will jointly review, and if necessary, update the workplace harassment and violence assessment and determine if any additional preventive measure are required.

Note: In instances where the notification is provided by a third party and the Employee subjected to the occurrence of harassment or violence chooses to remain anonymous or does not wish to proceed with the resolution process, the Employer the Workplace Policy Committee will conduct a review of the workplace assessment.

## **Employer Response to Principal Party**

42. The Designated Recipient should attempt to respond to the Principal Party as soon as possible and within seven (7) (consecutive) days after the day on which the Employer or the Designated Recipient is notified of an occurrence. The Employer will contact the Principal Party and:

- a. confirm that the notification has been received or inform them that a notification was received from a third party [address urgent situations immediately (e.g. imminent danger)];
- b. inform the Principal Party or the third party, as the case may be, of how to access the organizations workplace harassment and violence prevention Policy;
- c. explain each step of the resolution process; and
- d. inform the Principal Party or the third party, as the case may be, that they may be accompanied by a person of their choice or Union representative, at any time during the resolution process.

## **Employer Response to Responding Party**

43. The Designated Recipient will notify the Responding Party regarding the notification of an occurrence, when necessary and in a timely manner and:

- a. inform them that they have been named or identified as the Responding Party in the notice of an occurrence;
- b. inform them on how to access the organizations workplace harassment and violence prevention Policy;
- c. explain each step of the resolution process;
- d. inform them that they may be accompanied by a person of their choice or Union representative, at any time during the resolution process; and
- e. provide information on how to access support services.

## **Negotiated Resolution**

44. The Designated Recipient, the Principal Party and, if contacted, the Responding Party, must make every reasonable effort to resolve an occurrence for which a notice was is provided under subsection 15(1).

45. The reasonable effort includes a review by the Principal Party and the Designated Recipient to determine whether the notice of occurrence provided under subsection 15(1) describes an action, conduct or comment that constitutes harassment and violence as defined in subsection 122(1) of the Act.

46. The efforts to negotiate a resolution must begin no later than 45 days after the day on which that notice is provided. Pressure cannot be applied to participants to resolve an occurrence.

47. If resolution is not achieved, the Principal Party may choose to proceed with conciliation or an investigation.

### **Conciliation**

48. Conciliation of an occurrence of harassment or violence can only proceed if both, the Principal Party and Responding Party agree to it and agree on who will facilitate this process. If conciliation cannot proceed or if it is unsuccessful, and the Principal Party chooses to proceed with the resolution process, the notification of occurrence will be investigated.

### **Notice of Investigation**

49. The Designated Recipient will provide the Principal Party and the Responding Party with notice that an investigation will be carried out.

### **Selection of a Workplace Harassment Violence (WPHV) Investigator**

50. The Designated Recipient, the Principal Party and the Responding Party will select the person who is to act as the investigator. If the parties are unable to agree on an investigator within 60 days after the day on which the notice is provided, the Designated Recipient will select a person from among those whom the Canadian Centre for Occupational Health and Safety identifies as having the knowledge, training and experience required.

51. The Employer and the Workplace Policy Committee may have jointly developed or identified a list of persons who may act as an investigator.

### **Information for the WPHV Investigator**

52. The Designated Recipient will provide the investigator with all information that is relevant to the investigation including such as the nature of the occurrence, the scope of the investigation and the names of parties to be interviewed.

## **Investigation Report**

53. The WPHV investigator's report must not reveal, directly or indirectly, the identity of persons who are involved in an occurrence or the resolution process for an occurrence under these Regulations (e.g. work locations, dates, Division/group names). The Designated Recipient will provide a copy of the WPHV investigator's report to the Principal Party, Responding Party, the Workplace Policy Committee or health and safety representative.

## **Implementation of Recommendations**

54. The Designated Recipient will provide a copy of the summary report to the Workplace Policy Committee and they will jointly determine which of the recommendations set out in the summary report will be implemented.

55. If the Designated Recipient and the Workplace Policy Committee or health and safety representative cannot agree on which recommendations set out in the investigator's report should be implemented, then the Employer's decision as to which recommendations are appropriate to implement prevails. However, the Employer must document its decision and the reason for that decision as per paragraph 35(1)(d) of the Regulations and keep a record of the decision and its reasons for ten (10) years as per subsection 35(2) of the Regulations. The decision is to be filed with the Designated Recipient.

## **OCCURENCES INVOLVING THIRD PARTIES**

56. This Policy only applies where the Principal Party is an SNPF Employee, regardless of their position or level within the organization. If there is a complaint submitted from a third party (i.e. customer, DND, CAF, other government department, etc.) against an SNPF Employee, then each Division should have its own process for handling those complaints and/or seek advice from Human Resources in relation to allegations of misconduct regarding the incident in question.

57. If the Responding Party is a third party (not an Employee or the Employer), the resolution process set out in the regulations of the Act does not have to be followed. However, the Employer will nonetheless conduct a review and update of the workplace assessment, if required. The purpose of the review and update of the workplace assessment is not to determine if the notice of occurrence is founded. Rather, it is to identify if there are any additional risk factors, assess whether the preventive measures in place adequately mitigate and minimize the risk of harassment and violence in the workplace, and develop new preventative measures to eliminate or minimize the risk of a similar occurrence.

## **WORKPLACE ASSESSMENTS**

58. The Employer and the Workplace Policy Committee must jointly carry out a workplace assessment that consists of the identification of risk factors and the development and implementation of preventive measures.
59. The Employer and the Workplace Policy Committee must jointly monitor the accuracy of the workplace assessment and, if necessary, update it in order to reflect a change to the information set out in the assessment, including:
- a. a change to the risk factors identified; and
  - b. a change that compromises the effectiveness of a preventive measure developed and implemented.
60. The Employer and the Workplace Policy Committee must jointly review the workplace assessment every three (3) years and, if necessary, update it.
61. The Employer and the Workplace Policy Committee must jointly review and, if necessary, update the workplace assessment if a notice of an occurrence is provided and
- a. the occurrence is not resolved and the Principal Party ends the resolution process; or
  - b. the Responding Party is not an Employee or the Employer.
62. An assessment must take into account the circumstances of the occurrence.

## **REPRISALS**

63. Management and Employees must be aware that reprisal against an Employee who has exercised rights or duties under this Policy, or under the enabling legislation, is unacceptable and incompatible with the standards of civility and respect in the federal public service and SNPF.
64. More specifically, under section 147, the *Code* prohibits discipline against an Employee who has participated (but not the subject of the allegation) in the process outlined in this Policy.
65. Any form of reprisal may be subject to the same investigative procedures as notifications of harassment and violence. Further, an administrative investigation outside of this Policy could be initiated and may give rise to other measures, up to and including disciplinary action.

## DOMESTIC VIOLENCE

66. Violence, no matter where it takes place, can impact all areas of someone's life – including their workplace.
67. This includes similar terms such as:
- a. family violence,
  - b. gender-based violence, and
  - c. intimate partner violence.
68. No matter how it is labelled, domestic violence can happen to people of all genders. It happens in all racial, economic and religious backgrounds. It exists in relationships regardless of sexual orientation.
69. Domestic violence can include:
- a. stalking;
  - b. verbal abuse;
  - c. use of property, children, or pets to threaten and intimidate;
  - d. physical violence, sexual, emotional, and psychological intimidation;
  - e. use of electronic devices to harass and control (technology-facilitated abuse); and
  - f. economic abuse such as:
    - withholding or stealing money, and
    - stopping a partner from reporting to work.
70. Domestic violence may extend into the workplace where the aggressor uses emails, phone calls, text messages, stalking or showing up to the workplace to question co-workers. This can affect employment productivity and health and safety; organizations can help to recognize, respond to and address the impacts of domestic violence.
71. The Employer has a responsibility under the *Code* to protect and prevent against all forms of harassment and violence, including domestic violence.
72. Upon being made aware that an Employee is or is likely to be exposed to domestic violence or third party harassment or violence in the workplace, the Employer will take appropriate precautions to protect the Employee and any other persons at the workplace likely to be affected.
73. Employees are encouraged to seek support and report domestic violence so that appropriate safeguards can be put in place.

74. For information or support regarding domestic violence contact:
- a. 911 in emergency situations;
  - b. Trans Lifeline: 1-877-565-8860;
  - c. Employee and Family Assistance Program (EFAP);
  - d. [Shelter Safe](#), which helps women and their children seeking safety from violence and abuse by connecting women with their nearest shelter; and
  - e. visit the Government of Canada [Family Violence Resources](#).

## **EMERGENCY PROCEDURES**

75. Employees who are a victim or a witness of an occurrence of harassment and violence in the workplace that poses an immediate threat to individual health and safety should call the 911 emergency service or the local Military Police.

76. All Employees are required to be familiar with the following emergency procedures.

77. Employees must follow the Security Orders provided from the Headquarters or local Base/Wing.

78. The Workplace Policy Committee have developed this guide to further assist Employees to be prepared to handle an emergency that may arise. Those are available as Annex C – Emergency Procedures.

## **CONFIDENTIALITY AND PRIVACY**

79. The Employer is committed to the protection of the privacy of the persons involved in an occurrence. As such, the Workplace Policy Committee are not permitted any involvement in the resolution process of an occurrence. Only trained staff in the CCRE will engage in the resolution process with the Principal Party and Responding Party. Further, an investigator will not be permitted 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).

80. To encourage those who are victims or witness workplace harassment and violence to come forward, complaints relating to harassment and violence will be handled with utmost sensitivity and discretion. Trust and safety in the process is paramount. As required by the Regulations, the Employer must emphasize to investigators that their report must not reveal, directly or indirectly, the identity of parties and witnesses involved in the resolution process.

**Note:** protecting the full privacy of victims or witnesses in harassment and violence complaints may not always be possible or practicable in the context of the public service due to legal obligations including those respecting access to information and privacy. The Employer and/or Designated Recipient will work closely with the parties to address

the occurrence while ensuring that information about the complaint is not disclosed, unless required by law.

## **CORRECTIVE MEASURES**

81. Corrective measures under this Policy are meant to address systemic issues in order to prevent and address workplace harassment and violence in the workplace as a whole.

82. Although the investigation recommendations will be provided to the Employer for consideration and implementation to address the systemic risk factors that contribute to workplace harassment and violence in the workplace, there is no personal remedy or redress options under this Policy. Should the Employer determine that any sort of disciplinary measures are warranted based on behaviours of individuals, it will be conducted outside the purview of this Policy.

83. In order that the organization completes its due diligence to provide a safe and respectful workplace, while not addressed under this Policy, the appropriate delegated authority will be notified of the event/issue/allegations giving rise to the workplace harassment and violence occurrence to be addressed through the appropriate process. This may include follow up and action under the SNPF Discipline Policy where an individual may be subject to disciplinary action, up to and including termination.

## **RECOURSE OPTIONS**

84. Refer to Annex D – Recourse Options for a summary of available recourse options for Employees involved in an occurrence of workplace harassment and violence.

## **EMPLOYEE SUPPORT MEASURES**

85. The Employer offers support and assistance to all Employees who are affected by workplace harassment and violence. Those include:

- a. confidential services are offered by our Employee and Family Assistance Program. 24 hours a day, 7 days a week for immediate, confidential help: 1-800-387-4765 TTY: 1-877-338-0275 or online: [workhealthlife.com](http://workhealthlife.com);
- b. bargaining agent representatives;
- c. the Centre for Conflict Resolution and Ethics offers conflict resolution services and can be reached at [CCRE-CRCE@CFMWS.com](mailto:CCRE-CRCE@CFMWS.com); and
- d. the local NPF Human Resources Offices.

## **COMPLIANCE**

86. Compliance with this Policy including its reporting requirements are mandatory. Failure on the part of any Employee, to comply with this Policy may be considered as misconduct and therefore be subject to consequences as per the applicable Employer policies.

## **MONITORING AND REPORTING**

87. The CCRE will maintain and report on records of workplace harassment and violence as prescribed by the Regulation, and provide an annual report to the Workplace Policy Committee.

88. The CCRE will provide, on behalf of the Employer, by March 1<sup>st</sup> each year, an annual report to the Minister of Labour containing content as required by section 36 of the Regulations.

89. The Employer will carry out its obligations under the Regulations in consultation with and through the participation the Workplace Policy Committee. CCRE, in consultation with and with the participation of the Workplace Policy Committee, will review this Policy, including procedures, control measures and training for the prevention of workplace harassment and violence at least once every three (3) years.

## **REFERENCES**

### **Internal References**

Occupational Health and Safety Policy  
Discipline Policy

### **External References**

*Canada Labour Code* (Part II – Occupational Health and Safety)  
*Work Place Harassment and Violence Prevention Regulations*  
*Canada Occupational Health and Safety Regulations* (COHSR)  
*Canadian Human Rights Act* (CHRA)  
*Privacy Act*  
*The Access to Information Act*  
*Criminal Code*

### **Annexes**

[Annex A – Factors that Contribute to Workplace Harassment and Violence](#)

[Annex B – Workplace Harassment and Violence Training](#)

[Annex C – Emergency Procedures](#)

[Annex D – Recourse Options to Address Allegations of Workplace Harassment and Violence](#)