

CAMP NORTHLAND B'NAI BRITH 'Camp Northland'

HARASSMENT AND ABUSE AND WORKPLACE VIOLENCE POLICIES 2016

['the H.A.V. policy']

To Whom Does The H.A.V. Policy Apply:

The Camp Northland H.A.V. Policy applies to all Camp employees, campers, and other users such as clients of Camp Northland (including students, teachers, rental groups, and Family and Friend/re Weekend and event participants), parents, volunteers, contractors, and employees of other organizations not related to Camp Northland but who nevertheless work on or are invited onto Camp property.

This Policy applies to incidents or events which occur outside of camp and has repercussions that adversely affect the camp.

Although this is a broad policy collective, there are three independent modules relating to harassment, abuse and violence respectively. The Policy is not intended to limit or constrain the reasonable exercise of management functions at Camp or critical and required supervisory functions at camp that may arise from time to time. In the event of a conflict between this policy and the staff contract, this policy shall prevail to the full extent allowable by law. Anything in this policy that is deemed invalid in a court of law will be severed and not in any way impact the balance of this policy.

A. POLICY STATEMENT CONCERNING STAFF

The Camp Northland Director and Leadership Team are committed to providing a work environment in which all individuals are treated with respect and dignity within the provisions of the Ontario Occupational Health and Safety Act, Ontario Human Rights Code and all pertaining provincial and national laws related thereto. Every individual has the right to work in an environment free of harassment and the responsibility to maintain one.

Every member of the Camp Northland community has a right to equal treatment with respect to employment and /or with respect to the participation in programming and receipt of services and facilities without discrimination or harassment on the basis of the following grounds: Race, Ancestry, Place of origin, Colour, Ethnic origin, Citizenship, Creed, Sex, Sexual orientation, Gender identity and Gender expression, Age, Record of offences, Marital status, Family status, and Disability except as may be allowable by law.

Responsibility:

The Camp Director, and the Board of Directors are responsible for the application and interpretation of the Policy.

Intent:

- All employees, full-time, part-time, contract staff and consultants, are entitled to harassment free employment.
- Camp Northland is committed to providing a work environment where every employee is respected and is entitled to fair and equitable treatment.
- Workplace harassment is prohibited under the Ontario Human Rights Code and is illegal.
- Camp Northland will not tolerate any form of harassment and will make every effort to ensure no employee is subjected to such conduct by fellow staff, campers or their parents/guardians.
- Camp Northland encourages reporting of all incidents of workplace harassment, regardless of who the offender may be.
- All employees are responsible for ensuring that the workplace is free of harassment. Any employee who commits harassment or who knowingly condones the harassment of another individual will be subject to disciplinary action or dismissal.
- Notwithstanding the existence of this policy, every person continues to have the right to seek assistance from the Ontario Human Rights Commission even when recourse is being pursued under this policy.

Definitions:

- Harassment is unacceptable conduct, excessive and/or persistent behaviour which is unwelcomed or a comment that undermines the employment relationship or that might reasonably be expected to cause offence, intimidation, maliciousness or humiliation to any employee or might be viewed by the employee as placing an improper condition on employment. Harassment may take various forms but can be grouped into two broad categories:
- Harassment of an individual or individuals on any of the prohibited grounds of discrimination under the Canadian Human Rights Act. These include but are not limited to: age, race, sex, national or ethnic origin, colour, religion, disability, marital status, family status or conviction of an offense for which a pardon was granted. It includes: deliberate or unintentional gestures, comments, racial slurs, questions, representations or other behaviours that ought reasonably to be known by the harasser to be unwelcome by the recipient.
- Sexual harassment is deliberate and/or unsolicited verbal comment or physical contact of a sexual nature that is unwelcome to the recipient. Various behaviours that can be interpreted as sexual harassment include but are not limited to: sexually suggestive gestures, sexist jokes that embarrass, flirtations, advances or propositions, leering, the display of sexually offensive material, derogatory or degrading remarks directed towards members of one sex or one sexual preference group or sexual favours.
- Workplace harassment can be defined as engaging in a course of vexatious comment or conduct against a worker in a workplace – behaviour that is known, or ought reasonably to be known as unwelcome. The comments or conduct typically (though not necessarily always) happen more than once. They could occur over a relatively short period of time (for example, during the course of one day) or over a longer period of time (weeks, months, years).
- Workplace harassment can involve unwelcome words or actions that are known or should be known to be offensive, embarrassing, humiliating or demeaning to a worker or group of workers. It can also include behaviour that intimidates, isolates, or even discriminates against the targeted individual(s).

Such behaviour may include:

- Making remarks, jokes or innuendos that demean, ridicule, intimidate, or offend.
- Displaying or circulating offensive pictures or materials in print or electronic form.
- Bullying.
- Repeated offensive or intimidating phone calls, emails, texts, or social media posts.
- Inappropriate sexual touching, advances, suggestions or requests.

This definition of workplace harassment is broad enough to include harassment prohibited under Ontario's Human Rights Code, as well as what is often called "psychological harassment" or "personal harassment".

The workplace is any place where individuals perform work or work-related duties or functions. Camp and Camp-related activities, such as out-trips and excursions, comprise the workplace, as do Camp offices and facilities. Off-site training and conferences fall under this policy.

To Whom Does The Policy Apply:

This Camp Northland Policy applies to all Camp employees, campers, and other users such as clients of Camp Northland (including students, teachers, and rental groups, Family and friends/Alumni Weekend and event participants), parents, volunteers, contractors, and employees of other organizations not related to Camp Northland but who nevertheless work on or are invited onto Camp property.

This Policy applies to harassment which occurs outside the workplace and has repercussions that adversely affect the workplace.

Liabilities:

- Damages in the event of a successful lawsuit or human rights case can be costly and can be assessed against the harasser, any member of the Senior Staff who was aware of the harassment or might reasonably have been expected to be aware and, the organization. Penalties resulting from a harassment case are not limited to legal proceedings, disciplinary action taken by and adverse publicity directed toward the harasser, Senior Staff and, the organization.

Confidentiality:

- To protect the interests of the complainant, the person complained against and any others who may report incidents of harassment, confidentiality will be maintained throughout the process to the extent practicable and appropriate under the circumstances.
- All records of complaints, including contents of meetings, interviews, results of investigations and other relevant material will be kept confidential by Camp Northland except where disclosure is required by a disciplinary or other remedial process, which may include but is not limited to any judicial or other proceedings.

STAFF RESPONSIBILITIES

Action Steps:

- If you are a victim of harassment, the recommended course of action is as follows:

Step One

- Right at the time the incident occurs; make your disapproval and/or unease immediately known to the harasser. Indicate clearly that the behaviour or remark is unacceptable to you. Ask the harasser to stop, preferably in the presence of a witness. If the harassment does not stop, go to step two.

Step Two

- Talk to your immediate supervisor about the problem. If you are unclear who to approach or uncomfortable to do for any reason, please see the Leadership Team or Camp Director. Be specific. It is helpful to keep a written record of dates, times, the nature of the behaviour and witnesses, if any.
- If your unit/specialty head is the harasser, you should approach the Leadership Team or the Director with your concern. If this is not possible, use one of the alternate actions outlined.
- If your unit/specialty head does not take action and/or the harassment continues, you should contact the Leadership Team or the Director or in the case of a physical assault, the police should be contacted immediately.
- If you know or suspect that a co-worker is being harassed, be supportive. Let your co-worker know what actions he/she should take.
- In all cases, allegations of harassment can be escalated through various management levels to the Director. However, if it is difficult for the complainant to enter direct verbal discourse with the person about whom they are complaining go to Step 2 immediately.

Alternate Actions

- It is recognized that harassment is a very sensitive topic. If you are uncomfortable in approaching the harasser or in discussing the problem with your unit/specialty head there are number of alternatives available to you.
- Contact any member of the Leadership Team who you feel may be able to help you in resolving the situation.
- As an employer, we are legally obligated to investigate all allegations of harassment. A victim of harassment can insist that there be no investigation only if a signed release is obtained.
- All allegations of harassment will be treated in a timely and sensitive manner. The rights of the complainant and the respondent will be respected at all times. Confidentiality will be maintained throughout the process to the extent that it is practicable and appropriate under the circumstances.

MANAGEMENT RESPONSIBILITIES:

- We will discuss the policy with our staff and ensure a copy is available to each employee. The policy outline will be available from our office manager in the camp office.
- Head Staff will discourage harassment in their areas. They will treat the policy seriously and set a personal example to other employees.
- If Head Staff suspect or are made aware that an employee is being harassed, an investigation should begin immediately. Head Staff are responsible to fully investigate and resolve complaints of harassment. Legally, you, as a Head Staff member, can be held personally liable for failing to take action.

INVESTIGATIVE PROCEDURES:

- Investigation into an allegation or harassment should commence within 3 business days of the occurrence or report of the occurrence; however, these are the main steps to be followed in the course of the investigation:
- Obtain details of the incident from the employee.
- Interview the alleged harasser and obtain his/her side of the story.
- Interview the alleged harassed and obtain his/her side of the story.
- Interview all witnesses to the incident.
- Review the facts of the case and take appropriate action in consultation with a consultant.
- Convey the results of the investigation to the complainant and the respondent.
- Documentation and confidentiality of information are critical throughout all aspects of the investigation.
- This policy will be reviewed on an annual basis. This policy was last reviewed May 2015.

B. POLICY STATEMENT CONCERNING CAMPERS

Intent:

- All campers are entitled to a harassment free environment. The rights of the child are a matter of fundamental concern to Camp Northland.
- Campers need to be able to trust staff members and to expect a physically and emotionally safe environment.
- Camp Northland will make every effort to make its staff aware of behaviour characteristics of the campers they work with so that each staff member can establish the level of expectations for campers commensurate with the age and level of maturity of each camper so that harassment in any form will not be a part of the behaviour of staff.
- Harassment will not be tolerated. Any staff member who commits harassment or knowingly condones harassment of a camper will be subject to disciplinary action and/or dismissal. Nothing that Camp Northland will do will impede an official investigation of child abuse.
- Staff members under investigation for child abuse will be presumed innocent until such allegations are investigated and substantiated. However, they may be relieved of direct duties with campers during the time of the investigation, given other responsibilities or given paid leave of absence.
- Confidentiality will be maintained in the strictest sense pertaining to the identity of the alleged victim and the alleged abuser.
- It is important to note that child welfare laws in Ontario require that any adult and, in particular, individuals in positions of trust report suspected child abuse.
- It is essential that the protocols outlined in this policy be followed when abuse is suspected.

Definitions:

The Child and Family Services Act, which defines child abuse and governs the responsibilities of the Camp as set out in this document, will be referred to as **CFSA**.

Child: "a person under the age of eighteen years" (*CFSA section 3-1*)

Child in need of protection: a child is in need of protection where the child has suffered physical harm inflicted by the caregiver, or resulting from that person's failure to provide adequate care for the child; where the child has been sexually molested or sexually exploited by the caregiver; where the child needs medical treatment and the caregiver does not provide adequate treatment; where the child has suffered emotional harm as demonstrated by serious

anxiety, depression, withdrawal, or self-destructive behaviour; where the child has been abandoned; etc. (CFSA section 37-2)

Caregiver: The use of the word caregiver applies to the primary caregiver (parent, legal guardian, foster parent, etc.); an assigned caregiver (daycare worker, babysitter, partner of caregiver, etc.); or an assumed caregiver (teacher, recreational group leader, bus driver, camp counsellor, etc.).

Abuse: “means a state or condition of being physically harmed, sexually molested or sexually exploited” (CFSA section 79-1)

Types of Abuse:

Physical: non-accidental use of physical force, or use of excessive force, resulting in physical injury or death.

Emotional: behaviour in which a child’s sense of self is attacked, including constantly insulting, humiliating, belittling or rejecting a child, as well as socially isolating a child, intimidating a child, or routinely making unreasonable demands or imposing unreasonable expectations on a child.

Neglect: the situation or condition where there is inadequate care and nurturance of a child that could seriously impair his/her emotional or physical health and development.

Sexual: the use of a child by an adult for sexual purposes whether or not consent is alleged to have been given. It includes but is not limited to: acts of exposure, lewd or suggestive sexual comments, sexual touching or invitation to touch, exposing a child to pornography, involving a child in pornography (taking pictures or videos of naked children), and penetration.

Explicit Definitions of Sexual Abuse and Sexual Harassment:

verbal sexual harassment: insinuations or sexually explicit talk without consent (including obscene telephone calls)

exhibitionism: the act of displaying one’s genitals in the presence of others without their consent

voyeurism: the act of spying on another person while that person is in the state of undress

molestation: the touching of another’s genitals, buttocks or breasts without their consent

stimulation: forcing another person to stimulate one’s genitals, buttocks, or breasts

penetration: attempted or actual penetration of another person’s mouth, anus, or vagina without their consent if the victim is an adult or, under any circumstances, if the victim is a child

sexual harassment includes, but is not limited to, unwelcome or undesired sexually oriented humour or language, questions or comments about sexual behaviour or preference, physical contact, inappropriate comments about clothing or physical appearance, or repeated unwanted requests for social engagements

Sexual Exploitation and inappropriate conduct:

Pre-CITs and CITs at Camp Northland are considered campers without exception. Any suggestive, sexual or physical behavior or conduct with a camper will be grounds for immediate dismissal. Furthermore, anyone that is 16 or 17 years old falls into the definition of ‘young persons’ in the Criminal Code of Canada, s. 153. Accordingly, sexual exploitation laws prohibit conduct of this nature.

In addition, any counselor in a supervisory position, or a position relative to another staff member that creates an imbalance of power, is cautioned that any breach or violation of Canadian sexual exploitation laws will be grounds for immediate dismissal.

GUIDELINES:

In order to establish a safe environment the following guidelines need to be understood and adopted by each staff member.

For Discipline of Children:

- Counsellors may, under no circumstances, hit a child.
- Counsellors may not use abusive or derogatory language with campers.
- Counsellors need to ask for help.
- A staff member who encounters a particularly difficult child will seek the assistance of supervisory or administrative staff.

- In all dealings with campers, counsellors should strive to respond as opposed to react to children.
- It is well to note that The Day Nursery Act of Ontario indicates that: "No corporal punishment is permitted. No harsh or degrading measures that would humiliate or undermine a child's self respect. No deprivation of basic needs - food, beverage, shelter, clothing or bedding. No isolation or confinement of a child is permitted."

For Camper-Counsellor Contact:

Staff should understand and accept that when touching campers, the following guidelines should be followed:

- On the hand, shoulder or upper back;
- Never against a child's will (unless in the case of clear and present danger of the child);
- Never against a child's discomfort, whether expressed verbally or non-verbally;
- In the company of other adults;
- Never when it would have the effect of over-stimulating a child;
- Never in a place on a child's body that is normally covered by a bathing suit, unless for a clear medical necessity, and then only with supervision by another adult.

Counsellor Responsibility:

- A counsellor is the care-taker of campers
- A counsellor must understand there is a clear power difference between the counsellor and campers
- Inappropriate sexual contact with or physical abuse of campers can have severe emotional psychological effects on the camper and can last a lifetime

Staff/Camper Relationships:

- There is no "hazing" of campers by campers or counsellors;
- Campers will not be subjected to "initiation" rites that are abusive in any manner;
- There will be coverage of campers by adults during changing times;
- Younger children should be encouraged to change their own clothes as much as possible;
- Campers will not be alone individually with a counsellor in the cabin;
- A staff member will under no circumstance share a bed or sleeping bag with a camper;
- Counsellors will set limits with children who "cling" or hang on them;
- Counsellors will not give back rubs unless another adult is present, and then only with clothes on;
- Tickling or teasing a camper to the point where that camper is out of control is unacceptable;
- Pillow fights or wrestling matches and the like can become over-stimulating in short order and need to be limited and carefully supervised;
- Counsellors sleeping together on overnights, or on canoe trips, is grounds for dismissal;
- Romantic lives of counsellors can, under no circumstance, be shared with campers;
- Whatever is done with campers should be done in broad daylight, with company!

ACTION – Reporting a Case of Child Abuse (disclosed by a camper to a staff member):

As an organization that provides care to children, Camp Northland and its employees have a legal duty to report suspicion - based on reasonable grounds - of child abuse or that a child may be in need of protection.

"Despite the provisions of any other Act, if a person, including a person who performs professional or official duties with respect to children, has reasonable grounds to suspect [any type of abuse], the person shall forthwith report the suspicion and the information on which it is based to a society..."(CFSA section 72-1)

This mandatory reporting falls under the Child and Family Services Act (*section 72-2*) for professionals working with children, specifically "youth and recreation workers" (*CFSA section 72-5*).

Failure to report suspicion of child abuse can result in charges and a fine (*CFSA section 72-4*).

The person who actually suspects abuse, or to whom a disclosure has been made, must make the report directly to Child Services, not pass on the information and rely on a third party to make the report (*CFSA section 72-3*). Any Camp Northland staff member who suspects abuse or to whom a disclosure has been made will have to make the report to Child Services personally, but will have the support of the Director and the Leadership Team. Further, there is an ongoing duty to report so even if a previous report was made, if additional reasonable grounds arise, the person who made the initial report must inform Child Services (*CFSA section 72*)

Full Disclosure:

It is essential to take all allegations of sexual misconduct or child abuse seriously. In the case where a child directly tells an employee of Camp Northland about abuse, the person must follow these steps:

- Reassure the child that the employee will do what he/she can to keep the child safe from further harm, but will not promise to keep the disclosure a secret.
- Inform the Camp Director of the disclosure and that Child Services must be contacted. Child Services can determine whether the police will need to be involved. This is for children under the age of 16.
- Where the abused is between the ages of 16 and 18, the Police should be contacted directly. It is not likely that Child Services will be involved in that case and, if they are, it will be at the Police department's discretion. This applies to both campers and staff, if applicable, under the age of 18.
- Although the Camp Director must be made aware that an investigation process will be initiated by Child Services or the Police, it should not be divulged or discussed with any other person, whether an employee of Camp Northland or not. This is to respect the child's privacy, protect the child's safety, and to ensure the legitimacy of the investigation.
- Make a written report of the information on which the claim is based within 12 hours of disclosure, and comply with interview requests from Child Services or any branch of the police.
- In the case of physical or sexual abuse that occurs at Camp, the camper must be seen by a doctor within 24 hours of the abuse occurring, as a means to provide for the child's safety and to collect relevant evidence.
- Parents will be notified of the allegation of abuse by Child Services. Camp Northland (the Director, a member of the Leadership Team, or the employee making the claim) may be asked to assist in developing a strategy to inform the family, but Camp Northland employees may not inform parents that a report has been made without consultation with Child Services.
- In the case where a child makes a disclosure and subsequently denies or recants the statement, a report must still be made to Child Services.* It will be up to the investigative team (Child Services and the Police) to determine the validity of the abuse claim and whether to commence an investigation.

** "False denials of sexual abuse (saying it did not happen when it did) and recanting a disclosure of abuse (denying that it happened after having told someone about being abused) are much more common than false reports."
(Public Health Agency of Canada – Child Abuse Fact Sheet)*

Suspicion of Abuse:

It is not necessary to be completely sure that a child is or may be in need of protection to make a report to Child Services. "Reasonable grounds" are what an average person, exercising normal and honest judgement, would suspect. In the case where an employee of Camp Northland suspects abuse the person must follow these steps:

- Inform the Camp Director or a member of the Leadership Team of the suspicion, and how that suspicion arose. Together, determine whether to contact Child Services immediately, or to monitor the camper (if the "reasonable grounds" are shaky or unclear). Often, children will not disclose abuse through words, but through their behaviour (when physical evidence is not present) which is much harder to interpret. Questioning of the camper must be done with care, if at all; questioning should be done only to the point where the Director has a reasonable suspicion that the child is in need of protection. Leading or suggestive questions may impede an investigation if it is thought that a child has been prompted on what to say. For that reason, it is the Camp's policy to err on the side of caution, and report suspected cases of child abuse when several indicators are present.

Reporting Abuse By a Staff Member:

In order to prevent allegations of abuse by Camp Northland employees towards campers, staff will be trained and given guidelines to follow so that actions are not misinterpreted as abuse. These kinds of precautions are especially important in a residential setting, where the employees live in the same place as the campers, and there is room for misunderstanding. Any employee who unknowingly or mistakenly engages in an act that may be considered to be abuse will be reprimanded by the Camp Director and/or undergo further training to increase awareness of appropriate conduct.

Where it is suspected that a staff member has willingly and/or intentionally committed abuse, an investigation by the Camp Director and Leadership Team, including direct questioning of the employee, will commence immediately, and the employee will be removed from direct care of children until the investigation is complete. Where it is known that a staff member has willingly and/or intentionally committed abuse, that employee will immediately be terminated. Further, the Camp Director will contact Police and make a report of abuse.** This action may not fully absolve the Camp of liability in the abuse, but it may be taken into consideration in the case of a civil and/or criminal lawsuit.

*** The Criminal Code identifies a variety of offences which criminalize sexual abuse by any adult and also criminalizes physical assault (The Criminal Code, R.S.C 1985, c.46).*

It is the legal and moral obligation of any employee of Camp Northland who witnesses or suspects abuse by another employee to report the information to the Camp Director immediately. The Camp Director, Leadership Team, and employees of Camp Northland, will participate willingly and cooperate in any investigation of an allegation of abuse by a Camp Northland employee which is initiated externally (ie: by a parent upon a child's return from camp, etc.).

- As a facility operator, where health services are provided by professionals (RN, RPN, etc.), Camp Northland has a duty to report incidents of abuse by a Health Care professional to the appropriate College or governing body (for example, the Ontario College of Nurses) under the Regulated Health Professionals Act. Sexual abuse must be reported when the name of the alleged abuser is known and is a registered member of one of the health regulatory Colleges, where the person being abused was a camper, and/or where there are reasonable grounds to believe that sexual abuse occurred.

CAMP NORTHLAND WORKPLACE VIOLENCE PREVENTION POLICY 2015

Objective:

Camp Northland is committed to the prevention of workplace violence and is ultimately responsible for worker health and safety. The Policy is to further establish Camp Northland's commitment to providing a workplace that is safe and free of workplace violence as defined by Ontario's Occupational Health and Safety Act.

Responsibility:

The Camp Director is responsible for the application and interpretation of the Policy.

Definition of Violence:

Workplace violence may include:

- i. The exercise of physical force by a person against a worker, in a workplace that causes or could cause physical injury to the worker;
- ii. An attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker;
- iii. A statement or behaviour that is reasonable for a worker to interpret as a threat to exercise physical force against the worker in a workplace that could cause physical injury to the worker.

Definition of Workplace:

The workplace is any place where individuals perform work or work-related duties or functions. Camp and Camp-related activities, such as out-trips and excursions, comprise the workplace, as do Camp offices and facilities. Off-site training and conferences fall under this policy.

To Whom Does The Policy Apply:

The Camp Northland Workplace Violence Prevention Policy applies to all Camp employees, campers, and other users such as clients of Camp Northland (including students, teachers, rental groups, and Family and Friend/re Weekend and event participants), parents, volunteers, contractors, and employees of other organizations not related to Camp Northland but who nevertheless work on or are invited onto Camp property.

This Policy applies to violence which occurs outside the workplace and has repercussions that adversely affect the workplace.

Policy Statement:

Camp Northland will take whatever steps are reasonable to protect staff members from violence from any person in the workplace, including staff members, campers, clients, contractors, vendors, and members of the public. Everyone in the workplace must be dedicated to preventing workplace violence, and identifying potential sources of workplace violence. Leadership Team, Head Staff and staff members are expected to uphold this policy, and will be held accountable by the Camp Director.

By signing the Code of Conduct, campers, leadership participants, and staff members have pledged to not engage in any form of violence while at Camp or participating in Camp sanctioned activities off-site.

Camp Northland will ensure that the Workplace Violence Policy and supporting program are implemented and maintained and that all staff members have the appropriate information and instruction to protect them from violence in the workplace.

Every staff member must work in compliance with the Policy and the supporting program. All staff members are encouraged to raise any concerns about workplace violence and to report any violent incidents or threats. Threats of workplace violence can be made to the Camp Director, Leadership Team, or Health Centre team.

All reports are handled seriously, and investigated fully. So long as a report is made in good faith, no consequences will be levied against a reporting staff member.

Of course, in cases where a threat of serious injury or death is imminent emergency services should be contacted by dialling 9-1-1 on any Camp phone or personal cell phone. [This is an accepted and authorized exception to Camp Northland's cell phone policy]

The Camp Northland Harassment Policy should be consulted whenever there are concerns about harassment in the workplace.

Violence Protocol:

1. An Incident is reported to the Camp Director (or a designate on the Leadership Team).

I. The Camp Director (or designate) shall intervene immediately when informed of an incident of violence, or where they believe an incident may occur, in an attempt to ensure the safety of staff/volunteers. Intervention will include doing what is necessary to protect the physical safety of the complainant and all others at immediate risk of violence. In the absence of a reported allegation, an incident of possible workplace violence may also be reviewed or investigated.

II. In addition to reporting an incident, the complainant may also:

- take legal action as they feel appropriate.
- report the incident to police.

2. The Camp Director (or designate on the Leadership Team) shall conduct a preliminary review of the allegation to determine:

(a) If a mutually agreeable resolution between the complainant and respondent is possible, having regard to all applicable factors; or

(b) If reasonable grounds exist to continue with a formal investigation.

3. The Camp Director (in consultation, where appropriate, with Leadership Team members) shall appoint an investigator. The investigator(s) is/are responsible for formally investigating the incident(s).

The investigation shall follow the principles of due process and natural justice. Outside authorities (e.g. professional bodies, law enforcement) may conduct a concurrent investigation. The outcomes may differ.

4. Possible outcomes include:

I. If the respondent is a staff member or volunteer and the evidence found in the investigation upholds the allegation of workplace violence, Camp Northland will initiate follow-up action that may include termination of employment. Disciplinary action shall be determined based on the evidence supporting the allegation, and follow the consequences agreed to in the Staff Code of Conduct. Disciplinary action will be in accordance with applicable legislation, and will be documented.

- II. If evidence fails to uphold the allegation, no documentation concerning the allegation shall be placed on record for the staff member/volunteer.
- III. If the respondent is a visitor/camper/customer/client, Camp Northland shall provide support to the complainant as required to assist with the resolution of the incident.

The Camp Director shall ensure that the complainant and respondent are informed in writing about the outcome of a workplace violence investigation (to the extent permitted by legislation and bylaws).

References and Sources

With thanks to Various Ontario camps' Abuse, Harassment, Workplace violence and Sexual Exploitation Policy and Protocols

Ontario Ministry of Labour, Example Workplace Harassment Policy

http://www.labour.gov.on.ca/english/hs/pubs/wvps_toolbox/toolbox_7.php

Ryerson University, Discrimination and Harassment Prevention Policy

<http://www.ryerson.ca/policies/board/dhpspolicy.html>

Toronto District School Board, Workplace Harassment Policy

<http://www2.tdsb.on.ca/ppf/uploads/files/live/95/197.pdf>

Ontario Ministry of Labour, Example Workplace Violence Policy

http://www.labour.gov.on.ca/english/hs/pubs/wvps_toolbox/toolbox_6.php

Ryerson University, Environmental Health and Safety Management System Policy

<http://www.ryerson.ca/policies/board/ehsmanagementsystempolicy.html>

Toronto District School Board, Workplace Violence Prevention Policy

<http://www2.tdsb.on.ca/ppf/uploads/files/live/100/1770.pdf>