



WORKPLACE DISCRIMINATION, HARASSMENT AND VIOLENCE PREVENTION POLICY, PROGRAM AND PROCEDURES

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¹ Section 32.01(1) of OHSA requires that the Workplace Harassment and Violence Policy be reviewed at least annually by an employer.

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WORKPLACE DISCRIMINATION, HARASSMENT AND VIOLENCE PREVENTION POLICY

1. INTRODUCTION

1.1. Principles

1.1.1 Plan International Canada (**Plan International Canada**) is committed to providing a work environment which fosters respect for the dignity and well-being of each Employee. Every Employee has the right to work in an inclusive and respectful Workplace.

1.1.2 Plan International Canada has a zero-tolerance policy for Discrimination, Harassment and Violence in the Workplace.

1.1.3 Plan International Canada has an obligation to investigate all complaints of Workplace Discrimination, Harassment and Violence in accordance with this Policy.

1.1.4 All Employees are required to adhere to the provisions of the Ontario *Human Rights Code* which prohibits discrimination and harassment, including sexual harassment, with respect to employment based on the prohibited grounds set out in the *Human Rights Code*.

1.1.5 All Employees must also adhere to the provisions of the Ontario *Occupational Health and Safety Act (OHSA)*, which prohibits Workplace Harassment, Workplace Sexual Harassment and Workplace Violence.

1.2. Purpose

1.2.1 The main purpose of this Policy is to advise Employees of their rights and obligations under the Ontario *Human Rights Code* and OHSA, and to provide information to Employees, Associates and People Leaders on acceptable standards of conduct in the Workplace and how to identify and respond to incidents of Discrimination, Harassment and Violence.

1.2.2 This Policy is supported by the Workplace Harassment and Violence Prevention Program described in Section 3.9 and Appendix 3.

1.3. Objectives

1.3.1 The objectives of this Policy are to:

- a) Prevent Workplace Discrimination, Harassment and Violence from occurring through education and awareness;
- b) Provide information to all Employees, Associates and People Leaders on the Procedures for dealing with issues of Workplace Discrimination, Harassment and Violence (**see the Procedures annexed to this Policy**).
- c) Ensure risks for Workplace Violence are identified and procedures for reporting and resolving incidents of Workplace Violence are defined; (**see Procedure #4 – Procedures for Reporting and Investigating Workplace Violence**).
- d) Clarify, encourage and enforce acceptable standards of conduct.

1.4 Definitions

In this Policy, the following definitions are used:

“Associates” refers to a range of paid and non-paid individuals who have committed to support Plan International Canada including members of the Board of Directors, volunteers, interns, consultants, contractors and representatives of partner organization engaged by Plan International Canada.

“Bullying” refers to pattern of aggressive behaviour meant to intimidate, coerce, hurt or cause discomfort to another person. Bullying is a form of Workplace Harassment.

“Discrimination” refers to any form of unequal treatment with respect to employment based on a protected ground (i.e., race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex (including pregnancy and breastfeeding), sexual orientation, gender identity, gender expression, age, record of offences, marital status, family status and/or disability) that results in disadvantage, whether imposing extra burdens or denying benefits.² (**See Section 3.1 - Discrimination**)

“DE&I Committee” refers to Plan International Canada’s Diversity, Equity & Inclusion Committee.

“Employee” means a person who has entered into an employment relationship with Plan International Canada under contract and includes full-time, part-time, regular and temporary Employees, as well as Students.

“Employer” means Plan International Canada Inc.

“Joint Health and Safety Committee (JHSC)”, as defined in OHSA, means Plan International Canada’s committee composed of Employee and Employer representatives who are responsible for mutually improving health and safety conditions in the Workplace, identifying potential health and safety issues and bringing them to the Employer’s attention and keeping informed of health and safety developments in the Workplace by the Employer.³

Microaggression is defined as a “comment or action that subtly and often unconsciously or unintentionally expresses a prejudiced attitude toward a member of a marginalized group (such as a racial minority).”⁴ There are 3 components to this definition:

- (i) the behaviour in question is inherently subtle;
- (ii) there is often an absence of ill will; and
- (iii) the behaviour has the effect of expressing negative attitudes about a marginalized group

Microaggressions can perpetuate stereotypes about marginalized groups; leave an individual feeling insulted, singled out or imply that they “don’t belong”. See Appendix 1 for examples of Microaggressions.

A pattern of microaggressions may be determined to be evidence of Workplace Harassment or Workplace Discrimination. In some circumstances, a serious and single microaggression comment or action taken in the context of an individual’s behaviour may be sufficient to substantiate a claim of Workplace Harassment or Workplace Discrimination.

“OHSA” means the Ontario *Occupational Health and Safety Act*.

² See section 5(1) of the Ontario *Human Rights Code*.

³ See section 9 of *OHSA*.

⁴ Merriam-Webster dictionary, 2017.

“People Leader” means a person whose principal employment responsibilities consist of supervising or directing, or both supervising and directing, human or other resources, and includes a “Supervisor” as defined under *OHSA*.

“Personal Information” means information relating to Plan International Canada’s Employees, Associates or other individuals which is personally identifiable, or for which it is reasonably foreseeable in the circumstances could be utilized, either alone or with other information to identify an individual.

“Poisoned Work Environment” means, as defined by the Ontario Human Rights Commission, a negative, hostile or unpleasant Workplace or an unequal work environment caused by comments or conduct that tend to demean a group identified by one or more prohibited grounds of discrimination under the *Ontario Human Rights Code*, even if not directed at a specific individual. A Poisoned Work Environment may result from a serious and single event, remark or action.

“Student” means, as defined in *OHSA*:

- a) a secondary school student who performs work or supplies services for no monetary compensation under a work experience program authorized by the school board that operates the school in which the student is enrolled.
- b) A person who performs work or supplies services for no monetary compensation under a program approved by a college of applied arts and technology, university, private career college or other post-secondary institution.⁵

“Unsafe Work Refusal” has the meaning set out in Section 3.8.1 of this Policy.

“Workplace” means, as defined in *OHSA*, any land, premises, location or thing at, upon, in or near which an Employee works. (**See also Section 2.3 – Scope of the Workplace**).

“Workplace Harassment” means, as defined in *OHSA*,

- a) engaging in a course of vexatious comment or conduct against an Employee in a Workplace that is known or ought reasonably to be known to be unwelcome; or
- b) Workplace Sexual Harassment. (**See Section 3.2 and 3.3 - Workplace Harassment**)

“Workplace Sexual Harassment” means, as defined in *OHSA*:

- a) engaging in a course of inappropriate or vexatious comments or conduct against an Employee in a Workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought to be reasonably known as unwanted; or
- b) making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome. (**See Section 3.4 - Workplace Sexual Harassment**)

“Workplace Violence” means, as defined in *OHSA*:

- a) the exercise of physical force by a person against an Employee, in a Workplace, that causes or could cause physical injury to the Employee;
- b) an attempt to exercise physical force against an Employee, in a Workplace, that could cause physical injury to the Employee; or

⁵ See definition of “worker” under *OHSA*, section 1(1). Unpaid students and learners who are workers under *OHSA* have the same duties and rights as paid workers. All workers, including unpaid students, learners and trainees, must complete the basic training required by [Ontario Regulation 297/13](https://www.ontario.ca/gov/service/occupational-health-and-safety-awariness-and-training) (Occupational Health and Safety Awareness and Training). See <https://www.labour.gov.on.ca/english/hs/faqs/worker.php>.

- c) a statement or behaviour that it is reasonable for an Employee to interpret as a threat to exercise physical force against the Employee, in a Workplace, that could cause physical injury to the Employee. (**See Section 3.5 - Workplace Violence and Section 3.6- Workplace Domestic Violence**).

2. GENERAL PRINCIPLES

2.1 Scope

2.1.1 This Policy applies to all Employees and Associates of Plan International Canada.

2.1.2 While Employees have specific protection under Ontario legislation (including the Ontario *Human Rights Code* and *OHSA*) against Discrimination, Harassment and Violence in the Workplace, Plan International Canada seeks to extend these protections to its Associates when engaging with Plan International Canada whenever possible.

2.1.3 Plan International Canada also seeks to ensure that its Associates, when engaging with Plan International Canada, conduct themselves at all times in accordance with this Policy.

2.1.2 This Policy should be read in conjunction with Plan International Canada's *Code of Conduct* [[Click here to go to the PlanCONNECT Policy Library](#)] which articulates the Values and Behaviours expected of its Employees and Associates (**Appendix 1 to Plan International Canada's Code of Conduct**).

2.1.3 All People Leaders are accountable for actively promoting a respectful Workplace and for supporting, responding to and resolving complaints of Discrimination and Harassment as set out in this Policy.

2.2 Compliance and Violations

2.2.1 All Plan International Canada Employees shall comply with this Policy. Plan International Canada shall take steps to advise Associates of their obligations to comply with Policy, as it relates to their engagement.

2.2.2 Failure to comply with the requirements of this Policy may result in disciplinary action up to and including termination of employment or contract without notice or compensation. In situations of Workplace Violence or threat of Workplace Violence, legal action may also be taken.

2.2.3 The Ontario Ministry of Labour has the authority to investigate and levy fines or charges against Plan International Canada or any individual who violates OHSA and/or its regulations.

2.3 Scope of the "Workplace"

2.3.1 The Workplace includes, but is not limited to the physical work premises, work related functions sponsored by Plan International Canada (including offsite or onsite work-related functions, during or after work hours), work assignments outside of the office, work related travel within Canada, work-related conversations in person, over the phone or online, and work related conferences or training sessions within Canada if the Employee is there as a result of work-related responsibilities or a work-related relationship.

2.3.2 Employees should also refer to Plan International Canada's *Acceptable Use of [Social Media Policy](#)* and *Acceptable Use Policy*

2.3.3 All People Leaders are responsible and accountable for actively promoting a respectful Workplace in accordance with the expected Values and Behaviours set out in Plan International Canada's *Code of Conduct*, and for supporting, responding to, and resolving complaints of Workplace Discrimination, Harassment and Violence.

2.3.4 See Plan International Canada's *Safety & Security Policy* for guidance in respect of incidents occurring while travelling or working in the offices of Plan International entities, program locations or offices of Plan International partner organizations.

2.4 No Reprisals

2.4.1 Employees and Associates shall not suffer any form of reprisal if they:

- a) Report, in good faith, an incident of Workplace Discrimination, Harassment or Violence; or
- b) Cooperate with an investigation into an allegation or incident of Workplace Discrimination, Harassment or Violence and/or otherwise seeks the enforcement of this Policy.

2.4.2 Notwithstanding Section 2.4.1, upon completion of an investigation, if an Employee is found to be responsible for perpetrating Workplace Discrimination, Harassment or Violence contrary to this Policy, the Employee shall be accorded the appropriate disciplinary action. Associates will be accorded the appropriate penalty, which may include termination of their engagement with Plan International Canada.

2.4.3 Any People Leader, Employee or Associate who retaliates against an individual who reports or participates in an investigation of Workplace Discrimination, Harassment or Violence shall be subject to discipline up to and including termination of their employment or contract, without notice or compensation, and/or possible legal action.

2.5 Frivolous, Vexatious, Fraudulent or Malicious Complaints

2.5.1 Intentionally frivolous, vexatious, fraudulent or malicious allegations or complaints of Workplace Discrimination, Harassment or Violence will not be tolerated. If objective evidence shows that an Employee or Associate made a complaint or allegation in bad faith, including but not limited to complaints instituted with the deliberate intent to injure or mislead, or on the basis of improper motives, the Employee or Associate who made the allegation or complaint shall be subject to disciplinary measures up to and including termination of their employment or contract without notice or compensation, and/or possible legal action.

3. WORKPLACE DISCRIMINATION, HARASSMENT AND VIOLENCE PREVENTION⁶

3.1 Workplace Discrimination

3.1.1 In compliance with the Ontario *Human Rights Code*, every Employee shall be afforded equal treatment in employment without discrimination based on the following grounds:

- 1) Race, ancestry, place of origin, colour, ethnic origin;
- 2) Citizenship,
- 3) Creed (religion);
- 4) Sex (including pregnancy and breastfeeding);
- 5) Sexual orientation
- 6) Gender identity, gender expression;
- 7) Age
- 8) Marital status, family status;
- 9) Disability; and/or
- 10) Record of offences.

3.1.2 This Policy prohibits Discrimination on the grounds outlined in section 3.1.1, or any combination of these grounds. Discrimination does not have to be direct or intentional to be unlawful. Unlawful discrimination may result from practices or policies that appear to be neutral but have a negative effect on groups or individuals because of one of the protected grounds listed above.

3.1.3 All Employees are responsible and accountable for their actions, and shall refrain from conduct, behaviour or comments that are inappropriate, offensive and prohibited by this Policy or the Ontario *Human Rights Code*.

3.2 Workplace Harassment

3.2.1 Plan International Canada has an obligation to protect its Employees (and seeks to extend this protection to its Associates) from Workplace Harassment, including Workplace Sexual Harassment, by investigating incidents and complaints that arise in the Workplace. Plan International Canada does not tolerate or condone Workplace Harassment. Any Employee or Associate who engages in Workplace Harassment will be subject to disciplinary action up to and including termination of employment or termination of contract without notice or compensation.

3.2.2 Workplace Harassment includes comments or conduct directed at a specific individual or group but may also include comments or conduct which create a Poisoned Work Environment. Workplace Harassment typically involves a course of conduct but may also include a single serious incident. Workplace Harassment may 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 or years). Workplace Harassment may be verbal but may also result from conduct, written communication (e.g., electronic communications such as emails, chats etc.) or the display of images. Workplace Harassment also includes harassment prohibited under the grounds listed in the *Ontario Human Rights Code* (as listed in Section 3.5.1).

⁶ See [Appendix 1](#) for examples of Workplace Discrimination, Harassment and Sexual Harassment.

3.3 What is Not Workplace Harassment

3.3.1 Legitimate, appropriate and reasonable exercise of managerial responsibility relating to the management and direction of Employees or the Workplace is not considered Workplace Harassment. This is the case even if there are sometimes unpleasant consequences for an Employee. Examples may include performance management, changes in work assignments, scheduling, job assessment and evaluation, Workplace inspections, and disciplinary action, as well as directions to carry out reasonable and lawful duties and instructions, and to comply with Plan International Canada's policies and procedures.

3.3.2 Differences of opinion or minor disagreements between co-Employees would also not generally be considered Workplace Harassment.

3.4 Workplace Sexual Harassment

3.4.1 Workplace Sexual Harassment is a form of Workplace Harassment and may include unwelcome sexual advances (oral, written or physical), requests for sexual favours, sexual and sexist jokes or remarks, and the display of de-grading or offensive material when:

- 1) Such conduct might reasonably be expected to cause insecurity, discomfort, offence or humiliation;
- 2) Such conduct has the purpose or effect of interfering with a person's work performance or creating a Poisoned Work Environment;
- 3) Submissions to such conduct is made either implicitly or explicitly a condition of employment or any employment decision by a person in a position to confer, grant or deny a benefit or advancement; and/or
- 4) Reprisal or a threat of reprisal is made for the rejection of such conduct by a person in a position to confer, grant or deny a benefit or advancement.

3.5 Workplace Violence

3.5.1 Every person in the Workplace has a shared responsibility for preventing Workplace Violence. Plan International Canada does not tolerate or condone Workplace Violence. Any Employee or Associate who engages in Workplace Violence is subject to disciplinary action up to and including termination of employment or termination of contract without notice or compensation. Individuals who engage in Workplace Violence may also be subject to legal action, including criminal prosecution.

3.5.2 See **Appendix 2** for examples of Workplace Violence.

3.6 Domestic Violence

3.6.1 A person who has a personal relationship with an Employee, such as a spouse or former spouse, current or former intimate partner or a family member, may physically harm or attempt or threaten to physically harm an Employee at the Workplace. In these situations, domestic violence is considered Workplace Violence.

3.6.2 If Plan International Canada becomes aware that domestic violence is likely to expose an Employee to physical injury in the Workplace, it will take every reasonable precaution to protect the Employee.

3.6.3 Employees shall report any concerns about domestic violence that is likely to expose an Employee to physical injury in the Workplace to a Manager, Talent & Culture or the JHSC for assistance.

3.6.4 If an Employee discloses or a colleague or People Leader suspects that the Employee is subject to domestic violence, assistance should be offered to the Employee. Assistance may include, but is not limited to, referral to support programs such as [the Dialogue Employee & Family Assistance Program](#) or advising the Employee about Domestic and Sexual Violence Leave. Information about Domestic and Sexual Violence Leave is outlined in Plan International Canada's Leave of Absence Policy. [[Click here to go to the PlanCONNECT Policy Library](#)]

3.7 Risk of Violence

3.7.1 Plan International Canada will communicate information, including Personal Information, relating to a risk of Workplace Violence from a person with a history of violence where:

- a) an Employee may reasonably be expected to come into contact with the person in the performance of their job duties; and
- b) there is a potential risk of Workplace Violence that is likely to expose the Employee to physical injury.

3.7.2 Plan International Canada will only disclose Personal Information that is deemed reasonably necessary to protect the Employee from physical injury.

3.8 The Right to Refuse Unsafe Work

3.8.1 OHSA gives an Employee the right to refuse work ("**Unsafe Work Refusal**") that they reasonably believe is unsafe to them or another Employee. An Employee who reasonably believes that they are endangered by Workplace Violence may also refuse work.

3.8.2 No reprisal will be taken against any Employee that, in good faith, acts in compliance with or seeks protection under or enforcement of the provisions of this Policy or OHSA.

3.8.3 For more information on Unsafe Work Refusals, refer to Plan International Canada's *Occupational Health and Safety Policy* and *Occupational Health and Safety Procedures*. [[Click here to go to the PlanCONNECT Policy Library](#)]

3.9 Workplace Harassment and Violence Prevention Program

3.9.1 Plan International Canada shall establish and maintain a Workplace Harassment and Violence Prevention Program in accordance with the requirements of the *Occupational Health and Safety Act*. This Prevention Program shall include measures and procedures to protect Employees and Associates from Workplace Harassment and Violence, a means of summoning immediate assistance and a process for Employees to report incidents or raise concerns. This Prevention Program shall also include risk assessments, education and training and program evaluation.

3.9.2 Plan International Canada shall ensure a risk assessment is conducted and that such risk assessment is utilized to develop and implement a Workplace Violence Prevention Program that is appropriate for both the physical and verbal types of Workplace Violence risk

contemplated by this Policy. The risk assessment shall take into account the circumstances specific to the Workplace and that would be common to similar Workplaces. The results of the risk assessment shall be shared with the JHSC.

3.9.3 The risks of Workplace Violence shall be reassessed annually or as often as is determined to be necessary to protect Employees from Workplace Violence. The effectiveness of the Workplace Violence Prevention Program shall be evaluated annually by Plan International Canada and reviewed by the JHSC.

3.9.4 See Plan International Canada's Workplace Harassment and Violence Prevention Program at [Appendix 3](#) for more information.

3.10 Training on this Policy and Procedures

3.10.1 All Employees will be provided with information and training on this Policy and Procedures.

3.10.2 Associates will also be provided with information and training suitable to their engagement with Plan International Canada.

4. [RESPONSIBILITIES](#)

4.1 Plan International Canada's Responsibilities

4.1.1 Plan International Canada is responsible for:

- a) Ensuring the establishment of programs so that all People Leaders and Employees receive information, education and/or training on their responsibilities under this Policy and are held accountable for any breach of this Policy.
- b) Actively promoting a positive and inclusive work environment and intervening when problems occur.
- c) Protecting Employees and Associates from Workplace Discrimination, Harassment and Violence by:
 - a. ensuring Employees and Associates have reliable, safe and accessible channels to bring forward allegations of violations of this Policy;
 - b. ensuring investigations are conducted in a timely manner into credible allegations of violations of this Policy. An allegation is credible when the source, nature, and information of the report suggests that the allegation is plausible and warrants further investigation;
 - c. receiving, reviewing and acting on any reports arising from such investigations; and
 - d. supporting all reasonable measures to eliminate or mitigate risks of Workplace Discrimination, Harassment and Violence.
- d) Ensuring measures are in place to ensure compliance with this Policy by all Associates engaged with Plan International Canada.

- e) Ensuring that an effective Workplace Violence and Harassment Prevention Program is developed and implemented.
- f) Creating and promoting a climate of inclusiveness and safety to ensure each Employee has the opportunity to thrive.

4.2 People Leaders' Responsibilities

4.2.1 People Leaders are responsible and will be held accountable for providing a work environment free from Discrimination, Harassment and Violence, and for ensuring compliance with all aspects of the Prevention Program.

People Leaders are responsible for:

- a) Actively promoting a positive and inclusive work environment and intervening when problems occur.
- b) Communicating to all Employees/Associates that issues related to Workplace Discrimination, Harassment and Violence will be taken seriously and responding immediately to any issues brought to their attention.
- c) Intervening to stop unacceptable behavior and taking action to protect complainants who raise allegations, file complaints or report alleged incidents of Workplace Discrimination, Harassment or Violence.
- d) Taking appropriate action to resolve complaints immediately and informing the Director, Talent & Culture of any potential incident and/or complaint within 24 hours of becoming aware.
- e) Cooperating with investigations and/or other complaint resolutions mechanisms and maintaining confidentiality of information relating to the complaint or allegation.
- f) Declaring any potential conflict of interest in relation to an alleged violation of this Policy when they are, or may be perceived to be, either condoning or directly involved with the alleged violation. In this case, the next level of management not involved in the complaint must assume the responsibilities associated with a resolution.
- g) Not allowing, condoning, participating in or ignoring Discrimination, Harassment or Violence.
- h) Advising Employees/Associates not to threaten or retaliate against a complainant, respondent or witness and not threatening or retaliating against a complainant, respondent or witness.
- i) Ensuring that Employees/Associates are informed of this Policy and Procedures.
- j) Confirming with the Director, Talent & Culture on the proper process for responding to reported issues or complaints.
- k) Keeping a written record of all discussions with Employees/Associates who raise concerns under this Policy as well as their response to the situation and maintaining the confidentiality of this record.

4.3 Responsibilities of Employees and Associates

4.3.1 All Employees and Associates shall be responsible for:

- a) Actively promoting a positive and inclusive work environment.
- b) Supporting and reinforcing positive and appropriate comments, conduct and interactions with their peers that are consistent with the spirit and intent, and letter of this Policy.
- c) Following this Policy and its Procedures for the prevention and reporting of Discrimination, Harassment and Violence.
- d) Filing complaints as soon as possible, and no later than within 6 months after the alleged incident.
- e) Cooperating fully and completely in investigations and maintaining confidentiality throughout the process.
- f) Refraining from threatening, intimidating or retaliating against another Employee for exercising a right under this Policy and/or for participating in an investigation or resolution.
- g) Completing mandatory Workplace Discrimination, Harassment, and Violence prevention training within 30 days of their start date.
- h) Reporting all suspected incidents of Workplace Discrimination, Harassment, and Violence of which the Employee is aware as soon as possible after the incident. Employees should be aware that if concerns are raised to the Director, Talent & Culture or a People Leader that appears to be extremely serious in nature, then under Plan International Canada's obligations to safeguard all Employees, a decision may be made to investigate the allegations, regardless of whether the Employee wishes to raise a "formal complaint."

4.3.2 The responsibilities set out in Section 4.3.1 shall also apply to Associates, except for clause (g).

4.4 Talent & Culture Department's Responsibilities

4.4.1 Talent & Culture shall be responsible for:

- a) The administration of the processes relating to this Policy and for providing advice, guidance and ongoing support to Employees, Associates and People Leaders in respect of this Policy and the complaint and resolution process.
- b) Establishing and delivering appropriate training and education for all Employees, Associates and People Leaders.
- c) Conducting investigations into reported incidents of Discrimination, Harassment and Violence in consultation with Legal Counsel and other appropriate parties as required. This includes determining the threshold credibility of the reported incidents.
- d) Facilitating the annual review of this Policy.
- e) Fulfilling all other obligations required under legislation in respect of this Policy including OHSA and the Ontario *Human Rights Code*.

4.5 Joint Health and Safety Committee (“JHSC”) Responsibilities

4.5.1 The JHSC shall be responsible for:

- a) Reviewing and advising management of the nature and the extent of risks of Workplace Violence.
- b) Consulting on the development and implementation of the Workplace Harassment and Violence Prevention Program (see Appendix 3) and Procedures;
- c) Taking part in a review, at least annually, of the Workplace Harassment and Violence Prevention Program (see Appendix 3) and Procedures, taking corrective action where required and monitoring the effectiveness of the programs; and
- d) Consulting and making recommendations to Plan International Canada to develop, establish and provide training in measures and procedures to prevent Workplace Harassment and Violence.

4.6 Plan International Canada’s Diversity, Equity & Inclusion (DE&I) Committee’s Responsibilities

4.6.1 The DE&I Policies, Procedures and Governance Subcommittee shall serve as a consultation body on the annual review of this Policy including the *Workplace Harassment, Discrimination and Violence Program* (Appendix 3).

4.6.2 The DE&I Committee will refer allegations of incidents of Workplace Harassment, Discrimination which are reported through the “safe space” to the Director, Talent & Culture for investigation.

4.6.3 The effectiveness of the *Workplace Harassment and Violence Prevention Program* will be evaluated annually by Plan International Canada, the DE&I Committee and the JHOC.

Appendix 1 – Examples of Workplace Discrimination and Harassment

1.1 Examples of Prohibited Conduct.

Some examples of prohibited conduct that constitute Workplace Discrimination and Harassment, including Workplace Sexual Harassment, include but are not limited to:

- 1) Discrimination or Harassment in any aspect of employment, which may include but is not limited to: recruitment, selection, promotion, learning and development, performance management, pay and benefits, termination, job assignment and granting leaves of absence;
- 2) Discrimination or Harassment of an individual or group that occurs within the Workplace or during work-related activities or events outside of the Workplace;
- 3) Bullying;
- 4) Repeated offensive or intimidating phone calls or emails;
- 5) Displaying or circulating pornographic, homophobic, sexist, racist or other offensive or derogatory material (e.g., graffiti or pictures) in print or electronic form;
- 6) Racial, homophobic, sexist or ethnic slurs;
- 7) Written or verbal abuse or threats.
- 8) Sexual assault.
- 9) Leering (suggestive staring) or ogling another's body.
- 10) Unwelcome sexual remarks, invitations or requests (including persistent, unwanted contact after the end of a consensual relationship).
- 11) Coercion of sexual activity by threat of punishment or other sex-linked behaviour by promise of reward;
- 12) Malicious acts calculated at undermining an individual's performance or to threaten a career due to an unwelcome sexual request or invitation;
- 13) Inappropriate or unwelcome remarks, jokes, taunts, threats or suggestions about a person's body, attire, age, marital status, ethnic or racial origin, religion, sexual orientation, gender identity, gender expression, or any other ground of discrimination prohibited under the *Ontario Human Rights Code*.
- 14) Making remarks, jokes or innuendos that demean, ridicule, intimidate or offend, which are told or carried out after the individual has been advised that they are embarrassing or offensive, or that by their nature, are clearly embarrassing or offensive, for example, jokes about a person's accent or pronunciation.
- 15) Unnecessary and unwelcome physical contact such as patting, touching, pinching or hitting.
- 16) Practical jokes which ought reasonably to be known will result in embarrassment or insult;
- 17) Patronizing or condescending remarks or behaviour;
- 18) Abuse of authority which undermines performance or threatens an Employee's career;
- 19) Posting discriminatory, harassing, or threatening comments, photos or images on any social media site.
- 20) Jokes or epithets about an individual's protected status; teasing or practical jokes directed at an individual based on their protected status; verbal abuse or insults about, directed at, or made in the presence of an individual or group.

- 21) Criticism about an individual's personal characteristics, including their appearance.
 - 22) Making remarks about an individual's skin colour or other physical characteristics.
 - 23) Intentional misgendering or mispronouncing.
 - 24) Microaggressions. See the definition of Microaggressions in Section 1.4 (Definitions).
- Examples of Microaggressions include:
 - Commenting that a racialized individual's name is "not Canadian."
 - Saying "you people are so sensitive" to a racialized co-worker
 - Commenting that Christmas is a Canadian holiday, and that "immigrants" should not require others to say "happy holidays."
 - Commenting to a racialized individual: "your name's quite a mouthful; is there a nickname that I can use instead."
 - Commenting to a female co-worker: "I wouldn't have expected you to be so assertive."

Appendix 2 – Examples of Workplace Violence

Workplace Violence can include but is not limited to the following:

Abuse	<ul style="list-style-type: none">• Physical: An act of aggression resulting in physical assault or attempted assault with or without the use of a weapon.• Verbal: Verbal comments that represent threats and suggest that the subject of the comments is at risk of physical injury.
Threats/Intimidation	<ul style="list-style-type: none">• Verbal or Written: Any verbal or written expression of intent to inflict harm on any person.
Assault	<ul style="list-style-type: none">• Physical: Any intent to inflict injury on another; any intentional displays of force that cause the victim to fear immediate bodily harm.• Sexual: The use of threats or Violence to force one individual to touch, kiss, fondle or have sexual intercourse with another.

Examples of Workplace Violence include but are not limited to:

- 1) Verbally threatening to attack an Employee;
- 2) Leaving threatening notes at or sending threatening emails to a Workplace;
- 3) Hitting (or trying to hit), spitting, shoving, pushing, biting, groping, pinching or kicking an Employee;
- 4) Shaking a fist in an Employee's face;
- 5) Wielding a weapon at work;
- 6) Throwing an object at an Employee;
- 7) Sexual Violence against an Employee;
- 8) Kicking an object on which the Employee is standing on, such as a ladder;
- 9) Trying to run down an Employee using a vehicle; and/or
- 10) Destroying property.

Accidental situations are not meant to be included under Workplace Violence (e. g., an Employee tripping and accidentally pushing a co-Employee as a result).

Appendix 3 – Workplace Harassment and Violence Prevention Program

1. Introduction

1.1 As required under *OHSA*, Plan International Canada has implemented the *Workplace Discrimination, Harassment and Violence Prevention Policy* to aid in the prevention of Workplace Harassment and Violence. Plan International Canada is also required under *OHSA*, to maintain a program to support and implement this Policy as it relates to Workplace Harassment and Violence.⁷ This document details Plan International Canada's *Workplace Harassment and Violence Program* and provides an overview of the procedures and tools which are in place to support this Policy.

1.2 Plan International Canada's *Workplace Harassment and Violence Program* is comprised of the following:

1. This *Workplace Discrimination, Harassment and Violence Prevention Policy*.
2. Awareness and prevention training.
3. Procedures for reporting and investigating complaints and incidents.
4. Workplace Violence risk assessments.
5. Measures and protocols to address risks.

1.3 The effectiveness of the *Workplace Harassment and Violence Prevention Program* will be evaluated annually by Plan International Canada, the DE&I Committee and the JHOC.

2. Plan International Canada's Commitment

2.1 Plan International Canada is committed to ensuring that all Employees, Associates and others working on Plan International Canada's premises are protected from Workplace Harassment, including Workplace Sexual Harassment and Workplace Violence, and are aware of the processes for reporting incidents and requesting immediate assistance. Workplace Violence and Workplace Harassment will not be tolerated from any person in the Workplace.

3. Purpose of the Workplace Harassment and Violence Prevention Program

3.1 The purpose of this Program is to:

- a) protect Employees and Associates and aid in the prevention of Workplace Violence and Workplace Harassment;
- b) outline procedures for reporting, responding to and investigating complaints and/or incidents;
- c) protect an individual's privacy; and
- d) identify and address risks of Workplace Violence.

⁷ See section 32.02(1) and section 32.06(1) of *OHSA*.

4. Scope of the Workplace Harassment and Violence Prevention Program

4.1 The Workplace Violence and Harassment Prevention Program applies to all Employees in Plan International Canada's Workplace including Employees, People Leaders, and Students. The Program is also extended to Plan International Canada Associates, suitable to their engagement with Plan International Canada.

5. Implementing the Program

5.1 To protect Employees, Associates and others working on Plan International Canada's premises from Workplace Violence and Workplace Harassment, Plan International Canada has developed the Plan International Canada *Workplace Discrimination, Harassment and Violence Prevention Policy* which:

- Defines Workplace Discrimination, Harassment and Violence
- Outlines unacceptable behaviour; and
- Clarifies the mandatory responsibilities of all Plan International Canada's People Leaders and Employees.

5.2 This Policy will be provided to all new Employees as part of their orientation and will be available on PlanCONNECT.

5.3 Procedures for reporting and investigating Workplace Discrimination, Harassment and Violence are appended to the Policy. (*See Procedure #1 – Reporting and Investigating Workplace Discrimination and Harassment including Sexual Harassment and Procedure #4 – Reporting and Investigating Workplace Violence*).

5.4 People Leaders, Employees and Associates are responsible for:

- Reading the *Workplace Discrimination, Harassment and Violence Prevention Policy*;
- Contacting their People Leader or the Director, Talent and Culture if they have any questions regarding their roles and responsibilities in the Policy; and
- Following established procedures in this document.

6. Prevention and Awareness Training

6.1 To minimize the risk of Workplace Discrimination, Harassment and Violence, Plan International Canada has implemented mandatory training for all Employees. Plan International Canada provides e-learning modules which cover:

- The *Occupational Health and Safety Act* and its requirements;
- The definition of Workplace Discrimination, Harassment and Violence;
- Acceptable and unacceptable behaviour; and
- Employees' and People Leaders' responsibilities.

6.2 All Employees are required to complete e-learning modules within **30 days of their start date** with Plan International Canada.

- People Leaders are required to complete Workplace Violence and Harassment training within **7 days** of their start date in their People Leader role.

- People Leaders are also required to complete refresher training every three years.
- People Leaders are responsible for following up with Employees who have not completed their training by the stipulated due date and ensuring that the training is completed.

Procedure #1 – Procedures for Reporting Workplace Discrimination & Harassment including Sexual Harassment

1. Introduction

1.1 Plan International Canada Inc. ("**Plan International Canada**") is committed to ensuring that all Employees and other Associates working on its premises or remotely are protected from Workplace Discrimination, Harassment and Violence, and are aware of the processes for reporting incidents and requesting assistance.

1.2 Plan International Canada's *Code of Conduct Acknowledgement*, which all Employees and other Associates are required to sign, includes their commitment to:

1. Be aware of what constitutes harassment, bullying and discrimination and the damage it can do to individuals and to Plan International Canada, and to comply with all applicable policies and standards including Plan International Canada's *Workplace Discrimination, Harassment, and Violence Prevention Policy*; and
2. Not take part in any form of discrimination, harassment, or abuse (physical, sexual or verbal), intimidation or exploitation, or in any way infringe the rights of others.

2. Purpose and Scope

2.1 The purpose of these Procedures is to provide clear direction to Plan International Canada Employees, People Leaders and others on the process for reporting, responding to and investigating complaints and incidents of Workplace Discrimination and Harassment including Sexual Harassment and requesting assistance.

2.2 All Employees and People Leaders are responsible for:

1. Reading Plan International Canada's *Discrimination, Harassment and Violence Prevention Policy* to be sure they understand their roles and responsibilities; and
2. Following these Procedures in connection with reporting, responding to and investigating complaints and incidents.

3. Definitions

3.1 Unless otherwise defined in these Procedures, defined terms have their meanings in Plan International Canada's *Workplace Discrimination, Harassment and Violence Prevention Policy*. The following additional terms are used in these Procedures:

"Complainant" means the person who is alleged to have experienced Workplace Discrimination or Harassment.

"Investigator" means the individual assigned to investigate a complaint of Workplace Discrimination, Harassment or Violence. An Investigator may be internal (either a trained representative of Talent & Culture or Legal Services) or external.

"Respondent" means the person who is alleged to have carried out or condoned an act(s) of Workplace Discrimination or Harassment.

4. Procedures for Reporting Workplace Harassment and Discrimination

4.1 All Employees have an obligation to report any situations of Discrimination and/or Workplace Harassment, including Workplace Sexual Harassment that may contravene Plan International Canada's Workplace Discrimination, Harassment and Violence Prevention Policy.

4.2 Any complaints made under Plan International Canada's Workplace Discrimination, Harassment and Violence Prevention Policy should immediately be brought to the attention of a Director, Talent & Culture or the individual's People Leader for guidance on the proper process for responding to complaints.

4.3 Investigations shall be conducted into incidents and complaints which are appropriate in the circumstances, to ensure that identified problems are corrected, to prevent future violations of this Policy and to hold accountable those who fail to abide by this Policy

4.4 If the Employee's People Leader is the harasser, the Employee may report the incident to the next level of management not involved in the incident or to the Director, Talent & Culture.

4.5 People Leaders receiving a complaint must immediately notify the Director, Talent & Culture to ensure that an investigation may be conducted that is appropriate in the circumstances.

4.6 Employees are required to report incidents, either in writing or verbally, immediately and no later than 6 months of the alleged incident taking place. The report of the incident should include:

- (a) the name of the individual(s) who has allegedly experienced Discrimination or Harassment and contact information;
- (b) the name of the alleged harasser(s), position and contact information (if known);
- (c) names of witnesses or other persons with relevant information to provide about the incident and contact information (if known);
- (d) details of what happened, including date(s), frequency and location(s) of the alleged incident(s); and
- (e) any supporting documents that the Complainant, witnesses, other individuals and/or the alleged harasser(s) have in their possession that are relevant to the complaint.

4.7 Employees are encouraged to use the [Complaint Form](#)

4.8 The reporting and investigation process will be dealt with in confidence and the privacy of all parties involved will be respected as set out in Section 2.6 of Plan International Canada's *Workplace Discrimination, Harassment and Violence Prevention Policy*.

4.9 Employees who report incidents of Workplace Discrimination or Harassment will be offered support through Plan International Canada's [Dialogue Employee & Family Assistance Program](#).

Procedure #2 – Addressing Workplace Discrimination and harassment

Note: This Procedure applies to addressing allegations of Workplace Harassment and Discrimination. Allegations of Workplace Violence are addressed under Procedure #3.

Note: This Procedure refers to Employees. Associates should also follow this Procedure.

INTRODUCTION

There are 3 different approaches that can be taken in addressing Workplace Harassment and Discrimination matters:

1. Employee Direct Approach
2. Management Support and Intervention and/or
3. Formal Investigation Process.

These approaches are discussed below. The Employee or Associate should consider which Approach is most appropriate in the circumstances. There is no requirement to work through these Approaches in sequence.

APPROACH #1: Employee Direct Approach

- Employees are encouraged to attempt to resolve the matter directly where possible and communicate any concerns regarding improper conduct directly to the individual(s) responsible for the conduct as soon as it occurs. Employees should communicate their concerns or disapproval to the individual in clear terms.
- Employees who take this approach are advised to keep a written record of the date, time, location, details of the conduct, names of any witnesses and their effort to resolve the conduct in the event that this approach fails to solve the problem.
- Employees shall also notify their People Leader, or the first level of management not involved in the incident (in the case where their People Leader is involved) or the Director, Talent & Culture of the incident and provide the documented details by email. A People Leader or the first level of management (when the People Leader is involved) who receives information from an Employee shall advise Talent & Culture of the occurrence.
- If this issue does not resolve after the initial discussion, the Employee shall notify their People Leader or the first level of management not involved in the incident (in the case where their People Leader is involved) or Talent & Culture of the recurrence for further review and investigation.
- In situations where more than one Employee experiences the same or similar incidents of Workplace Harassment and Discrimination, these Employees should raise the matter with Talent & Culture.
- During this process, the privacy of all parties involved should be respected to the extent that doing so remains consistent with the enforcement of this Policy and adherence with the law.

APPROACH #2: Management Support and Intervention

- If an Employee is uncomfortable addressing the issue with the individual(s) involved in the incident, the Employee is encouraged to raise concerns or issues to their People Leader, or the first level of management not involved in the incident or Talent & Culture.
- People Leaders and Talent & Culture representatives are required to address an allegation of Workplace Harassment or Discrimination brought to their attention, whether in confidence or not, and shall advise the Employee that they are required to act on the complaint.
- People Leaders (if not involved in the incident) or the first level of management not involved in the incident shall immediately:
 - Intervene to stop the unacceptable behaviour;
 - Contact the Director, Talent & Culture to obtain advice and provide information in order for Talent & Culture to conduct a preliminary assessment of the complaint;
 - Determine the proper resolution issue with advice from Talent & Culture;
 - Protect the confidentiality of Employees/Associates who raise an allegation or complaint to the maximum extent possible;
 - Facilitate the resolution in a timely manner and implement the appropriate remedy.
- Where a People Leader(s) is the subject of the Complaint, a determination shall be made as to whether interim measures are required to be implemented while an investigation is being conducted, such as providing the Complainant or Respondent with a paid leave of absence or relocating one of the parties to another location at work.
- After assessing the situation and determining that the requisite threshold for further action has been met, the Talent & Culture representative, if other than the Director, Talent & Culture, shall advise the Director, Talent & Culture who will recommend a course of action, to be approved by the VP, Talent & Culture and, where warranted, assign an Investigator as appropriate to conduct an investigation. (*See Procedure #3- Formal Investigation Process*).
- Talent & Culture will consult with Legal Services as required throughout the process.
- The People Leader (if not involved in the incident) or the first level of management not involved in the incident and/or the Talent & Culture representative shall also advise Employees or Associates involved in the complaint that they may not threaten or retaliate against any Complainant, the Respondent or witness to a complaint.
- During this process, the privacy of all parties involved should be respected to the extent that doing so remains consistent with the enforcement of this Policy and adherence with the law.

APPROACH #3: Formal Investigation Process

- A formal investigation involves gathering information and interviewing the parties involved.
- A formal investigation may be conducted by internal resources (Talent & Culture or Legal Services) or an external Investigator.
- In an investigation, the Investigator gathers information and interview parties to determine whether or not Plan International Canada's *Workplace Discrimination, Harassment and Violence Prevention Policy* and/or Plan International Canada's *Code of Conduct* or other Plan International Canada Policy or law has been violated.

- An investigation must be completed in a timely manner and generally within 90 days or less unless there are extenuating circumstances (i.e., illness, complex investigation) warranting a longer investigation.
- **See Procedure #3 for more details regarding the Formal Investigation Process.**

Procedure #3 – The Formal Investigation Process

Note that these Procedures may be adapted at the discretion of the Investigator to reflect the complexity of the investigation or changes in due process requirements.

A. Overview of the Investigation

1. The Director, Talent & Culture, with the approval of the VP, Talent & Culture, shall assign an Investigator as appropriate in the circumstances.
2. The Investigator must ensure that the investigation is kept confidential and information relating to the investigation is not disclosed unless necessary to conduct the investigation. At the onset of the investigation, the Investigator will advise all parties involved in the investigation of the requirement to maintain confidentiality throughout the investigation.⁸ At the discretion of the Investigator, interviews will be taped and retained for as long as required.
3. To initiate an internal investigation, the Investigator shall obtain a written, signed and dated statement from the Complainant(s) which provides details of the incident, including the date, location, time, individual(s) involved and, if applicable, witnesses to the incident. The Complainant(s) will be provided with the opportunity to review the statement prior to signing.
4. The investigation may include interviews with the Complainant(s), the alleged harasser(s), interviews with witnesses (if applicable), interviews with the responsible People Leader (if applicable) and review of any relevant documentation related to the incident. If the alleged harasser(s) is not a Plan International Canada Employee, the Investigator shall make reasonable efforts to interview the alleged harasser(s).
5. During the interviews, the Investigator will document all relevant details of the interview and, where appropriate, shall obtain a written, signed and dated statement from each interviewee. Interviewees will be provided with the opportunity to review the statement prior to signing.
6. Each interviewee shall be advised that the parties involved in the investigation shall not be subject to reprisal.
7. The alleged harasser(s) and Complainant(s) must have access to enough information about the allegations and responses of other parties and witnesses so that they are able to make a defence or rebuttal. The alleged harasser must be given the opportunity to respond to the specific allegations raised by the Complainant.
8. The Investigator will prepare a written report summarizing the steps taken during the investigation, the complaint, the allegations of the Complainant(s), the response of the alleged harasser(s), the evidence of any witnesses, and the evidence gathered. The report must set out the facts and provide a conclusion about whether harassment or discrimination was found or not. The Complainant(s) and the alleged harasser(s) will not be provided with a copy of the report.
9. A determination shall be made as to whether interim measures are required to be implemented while an investigation is being conducted, such as providing the Complainant or Respondent with a paid leave of absence or relocating one of the parties to another location at work.

⁸ See Section 2.6 of Plan International Canada's *Workplace Discrimination, Harassment, and Violence Prevention Policy (Confidentiality and Disclosure of Information)*.

B. Resolution of the Complaint

1. If the investigation supports the complaint, the Investigator shall review the outcome with the Director, Talent & Culture, VP, Talent & Culture and Legal Services to determine appropriate corrective measures.
2. Within 10 days of the completion of the investigation, the Investigator shall meet separately with both the Complainant(s) and the alleged harasser(s), if an Employee of Plan International Canada, to inform them regarding the outcome of the investigation and provide to each party, in writing, a summary of the results of the investigation and the corrective measures that have been or will be taken as a result of the investigation. Corrective measures will vary depending upon the seriousness of the complaints and the findings and may include: requirement to attend mediation, coaching and counselling sessions or sensitivity training; mandatory refresher training on the Workplace Discrimination, Harassment and Violence Prevention Policy and/or Plan International Canada's Code of Conduct, suspension with or without pay; leadership intervention; termination of employment or contract; or referral for criminal proceedings.
3. To reduce and minimize the risks of Workplace Violence and / or Workplace Harassment, People Leaders (if not involved in the incident or the first level of management not involved in the incident) are responsible for implementing recommendations or directives arising from the investigation.
4. In situations where a complaint is substantiated, or where a complaint is not substantiated but it is determined that there was some form of conflict that requires restorative measures, People Leaders (if not involved in the incident or the first level of management not involved in the incident) are required to review and assess the workplace within 6 months after the resolution of the complaint. Such People Leaders shall assess whether restorative measures have been successful or if additional measures are required, such as additional training and coaching on conflict resolution.
5. Such People Leaders may contact Talent & Culture for assistance on restorative measures.

C. Confidentiality and Disclosure of Information /Record Keeping

1. When investigating a complaint or incident of Workplace Discrimination, Harassment or Violence, the privacy of all parties involved will be respected to the extent that doing so remains consistent with the enforcement of this Policy and adherence with the law.
2. Disclosure of information relating to an investigation will be limited in order to protect confidentiality to the extent possible. Information, including but not limited to identifying information about any individuals involved, shall only be disclosed if the disclosure is necessary for the purposes of investigating or taking corrective action relating to the incident or complaint, or is otherwise required by law.
3. Every individual involved in the investigation process (which includes the Complainant(s), Respondent(s) and witnesses) has an obligation to maintain confidentiality with respect to the information provided and received during the investigation process. Any individual involved in the investigation process shall also maintain the security of all documents related to the investigation. Failure to maintain confidentiality may result in disciplinary action.
4. Personal Information will only be collected, used or disclosed when the collection, use or disclosure is necessary for carrying out the investigation and in accordance with applicable privacy legislation.
5. Complaints made under this Policy shall not be referenced in an Employee's personnel file, unless disciplinary action was taken against the Employee.

6. The results of the investigation and any corrective action that has been or will be taken shall be provided in writing to both the Employee who allegedly experienced the Workplace Discrimination, Harassment or Violence, and the individual(s) against whom the complaint was made, if that person is an Employee of Plan International Canada. The investigation reports relating to investigations of Workplace Harassment shall not be shared with the JHSC.
7. Talent & Culture will keep records of the investigation, in accordance with Plan International Canada's record retention rules and applicable law, including:
 - A copy of the complaint or details of the incident;
 - A record of the investigation including notes and recordings;
 - Witness statements, as applicable;
 - A copy of the investigation report, as applicable;
 - A summary of findings;
 - The corrective action taken to address a complaint or incident.

Procedure #4 – Procedures for Reporting and Investigating Workplace Violence

1. Responsibilities:
 - (i) Employees shall report Workplace Violence in accordance with these Procedures.
 - (ii) People Leaders are responsible for ensuring that all reports of Workplace Violence are investigated and documented and that any injuries, Critical Injuries or fatalities are reported as required to Talent & Culture.
 - (iii) Talent & Culture is responsible for advising and reporting to appropriate parties, such as the JHSC or the Ontario Ministry of Labour, if applicable.
 - (iv) Talent & Culture and Legal Services is responsible for participating in an investigation of Workplace Violence and investigating Critical Injuries or fatalities related to Workplace Violence.

2. If an act of Workplace Violence is occurring or if someone in the Workplace is facing an imminent threat of Workplace Violence compromising their safety, call 911 for immediate assistance and notify building security that 911 has been called. If the situation does not warrant immediate police involvement, report the threat/incident as set out below.

3. Employees shall report any act or threatening statement of Workplace Violence to their People Leader, or, if the People Leader is the harasser, to the next level of management not involved in the incident, or the Director, Talent & Culture.

4. People Leaders or the next level of management (when People Leaders are involved in the incident) must immediately notify Talent & Culture of the complaint or incident of Workplace Violence.

5. The Talent & Culture representative will contact the People Leaders (or the next level of management when People Leaders are involved in the incident) for details on the incident and advise the Director, Talent & Culture. The Director, Talent & Culture will recommend a course of action, to be approved by the VP, Talent & Culture, and assign an Investigator as appropriate to conduct an investigation. For information on the formal investigation process, see Procedure #3.

6. If an investigation is conducted into an injury, critical injury⁹ or fatality, the Talent & Culture representative will debrief the Chief Operating Officer on the incident and outcome of the investigation.

7. The Talent & Culture representative will debrief Plan International Canada's JHSC on the incident by providing a confidential and high-level overview of the incident and resolution.

⁹ See definition of "critically injured" in section 1(1) of Reg. 420/21 to OHSA. Notices and Reports Under Sections 51 To 53.1 of The Act — Fatalities, Critical Injuries, Occupational Illnesses and Other Incidents.

Procedure #5– Procedure for Addressing Domestic Violence

If an Employee believes that an incident of domestic violence may impact the Employee or another Employee in the Workplace, the Employee must notify their People Leader

Action Required:

<p>If there is immediate concern about any Employee's safety:</p>	<ul style="list-style-type: none"> • Summon immediate assistance by calling 9-1-1 or building security. • If an incident of domestic violence in the workplace results in an injury, critical injury or fatality, follow the accident reporting procedures outlined in the Health and Safety Procedures.
<p>If there is no immediate threat:</p>	<ul style="list-style-type: none"> • The People Leader shall contact Talent and Culture to report the issue, who shall advise the Vice-President, Talent & Culture. • A course of action may include the development of an individual safety plan for the Employee. Some examples of the Workplace safety plan include changing the Employee's start and leave time or changing work locations. • Employees shall also be advised of and provided with Employee Assistance Plan services.
<p>The Employee's confidentiality will be maintained on a needs-to-know basis.</p>	